



Response from Exeter Cycling Campaign to  
Exeter City Council's Draft Air Quality Action Plan 2018

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**Exeter Cycling Campaign**

to Exeter City Council's

**Draft Air Quality Action Plan**



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## Introduction

This is the response from the Exeter Cycling Campaign to Exeter City Council's draft [Air Quality Action Plan](#) 2018.

The effects of local air pollution on health are undisputed and these disproportionately affect our city's [most vulnerable people](#).

This is an urgent issue<sup>1</sup>. The statement that "Air quality in Exeter is mainly good" belies the figures of more than 42 people dying prematurely every year. The existence in the city of an Air Quality Management Area (AQMA) that legally necessitates production of this AQAP is testament that we have a pressing need to improve our air quality.



There can be no complacency in tackling this.

There is therefore clearly a need for strong and bold leadership from our Councils and Councillors to improve our air quality.



The Exeter Cycling Campaign therefore welcomes the draft Air Quality Action Plan's (AQAP) attempts to be bolder in aspiring to make "the private car...seldom used for journeys within Exeter", to "create sustainable car-free communities", and to have "Internal combustion engines...discouraged in a vibrant centre".

We wish to see greater urgency in implementing the air quality improvement measures, would advocate more detailed targets and goals and

urge a focus upon the measures that will have the most impact on improving air quality..

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**We are convinced that the most effective way of improving our air is to have more people walking and cycling and fewer private cars in our city centre. The former is achieved by building a comprehensive city-wide network of protected, connected and convenient cycle paths, the latter by making it less convenient and the costs more realistic for driving a car.**

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<sup>1</sup> A recent parliamentary joint parliamentary select committee called it a "national emergency"

## Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

In this response the Exeter Cycling Campaign presents specific proposals for making the vision of the AQAP achievable. Enabling cycling as the way of tackling pollution also has the advantage of tackling congestion and addressing our inactive lifestyles. It's the way to build a better city.

We question the efficacy of some of the measures in the draft AQAP.

We also have a concern that there remains too much emphasis on 'promoting' and 'encouraging' active transport: an ineffectual way of achieving the large shift of people onto the active transport modes that will actually affect air quality. Similarly, proposals to 'inform' people of air pollution in the hope that this will change travel habits seems naive.



**Experience from around the world shows cities that have been successful in driving down pollution are those that have *enabled* (not merely 'encouraged') and prioritised cycling and walking for people of all ages and abilities. This has been achieved by building safe cycling and walking paths in these cities, building living streets in residential areas by inhibiting rat-running and ensuring private car journeys and storage are fairly paid for.**

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

## Summary of measures proposed by the Exeter Cycling Campaign

1. Embrace the Department for Transport's Cycling & Walking Investment Strategy (CWIS) and develop an overarching strategic plan for Exeter's cycling and walking network using DfT [LCWIP<sup>2</sup> guidance](#)
2. Adopt a city-wide 15 year strategic plan (such as the [Exeter Cycling Campaign's 2030 Network Plan](#)) for a dense cycle network across the city and pursue the means to deliver it without delay.
3. Enhance the training for Planners and Highways Maintenance staff to cover best practice and design.
4. Explicitly adopt [best practice design standards](#) for street design so that public highways are built efficiently and prioritise active transport modes.
5. Adopt filtered permeability solutions to build Living Streets in residential areas.
6. Create Development Briefs for new development areas with SPD<sup>3</sup> status.
7. Congestion charge and pollution charge: Charge for the use of valuable road space, variable by time of day and zone travelled. Charge separately according to pollution emitted.
8. Incrementally remove parking in areas and roads where cycle commuting should be enabled.
9. Commission cross-council programme management control to deliver the AQAP measures and report progress every six months to a cross-council task group.
10. Ensure there is provision for Co-Bikes and Co-Cars stations in all new housing developments.
11. Invest in cycle hubs with high quality and secure cycle parking next to rail stations in and around Exeter.
12. Develop a policy for managing a dockless bike hire scheme.
13. Develop a workplace parking levy and hypothecate the income for walking, cycling and public transport investment.
14. If any Park & Ride scheme are introduced ensure they include Park & Cycle provision.
15. Roll out a city-wide Community Congestion Charge for parking on all the city's public highways.
16. Cycle parking stands to be built across the city but not take away space from people walking.
17. Enhance the air quality monitoring network.

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<sup>2</sup> [LCWIP](#): Local Cycling & Walking Infrastructure Plan

<sup>3</sup> SPD: Supplementary Planning Document

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

## Response to Consultation questions

### Question 1: Do you agree with the vision for emissions reduction in Exeter?

The Exeter Cycling Campaign welcomes the draft Air Quality Action Plan's (AQAP) boldness of vision, especially the aspirations:

- The private car is seldom used for journeys within the city
- Development creates sustainable car-free communities
- Internal combustion engines are discouraged in a vibrant centre

We are surprised to see so little reference to **enabling** more cycling and walking as a means of reducing emissions in the city.

The Exeter Cycling Campaign is convinced that enabling a wholesale shift from private car to cycling for 1-5 mile journeys is the most effective means of tackling air pollution. Transport modelling<sup>4</sup> suggests that there is significant opportunity to grow the modal share of cycle, or cycle+train commuting in Exeter.



### Question 2: Do you agree with the vision for exposure reduction in Exeter?

The Exeter Cycling Campaign maintains that the vision for exposure reduction in Exeter **relies too much on 'promoting' and 'encouraging' active transport: an ineffectual way of shifting people to active transport modes.**



Similarly, the proposals to 'inform' people of air pollution in the hope that this will change travel habits seems naive.

The AQAP should instead be enabling citizens to build walking and cycling into **daily routines** by building a dense network of safe, convenient and connected cycle and walking paths across the city.

Measures to 'encourage' cycling are of limited effectiveness in achieving this modal shift. Cities that have been successful at improving air quality by getting more people cycling have done this by prioritising people who cycle or walk by building safe infrastructure and nudging people out of their cars by making it less attractive, less convenient and more expensive.

<sup>4</sup> for example, using the [Propensity to Cycle tool](#)

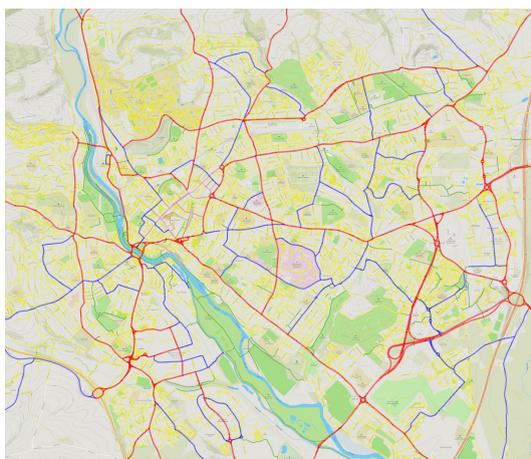
## Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

Question 3: Do you think that the areas of work set out in table 3.2 capture all that is necessary to deliver the vision?

The Exeter Cycling Campaign proposes that in addition to the areas of work that are captured in table 3.2 further measures are essential to support them. In particular:

### **Develop an overarching strategic plan for a dense cycling and walking network**

The AQAP makes no reference to an overarching strategic plan to guide and shape the development of a cycling and walking network across the city. Without this any development of cycling and walking paths will be incoherent and not joined up. Central Government's 2017 'Cycling & Walking Investment Strategy' (CWIS) encourages all local authorities to develop a 'Local Cycling & Walking Infrastructure Plan' (LCWIP) as a way of building this holistic, long-term strategic plan.



Such an overarching plan is needed in order to provide a coherent and joined up approach to the development of a transport network which rebalances space and priority away from the current, subsidised, private motorist.

The Exeter Cycling Campaign urges Devon County Council and Exeter City Council to work together to develop an LCWIP and, as part of this, adopt a long term strategic network plan for cycling in the city. The Exeter Cycling Campaign's [2030 network Plan](#) shows how this might look.

The learning from Exeter's participation as a Cycle Demonstration Town in 2005 is that building cycling infrastructure increases the modal share for cycle journeys. It is this modal shift out of the private car that will improve our air quality.

Question 4: Do you think that the areas of work listed in table 3.2 are achievable?

Please see the response to Question 6 for details.

Question 5: How do you think that projects and programs taken forward by organisations listed in section 4.2 could best be coordinated? What body do you think is best placed to do this?

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

The draft AQAP states that “In Exeter, the main source of local air pollution is from road traffic” the most effective way of reducing pollution is tackling polluting road traffic”. Exeter Cycling Campaign proposes therefore that a cross council body is empowered by both ECC & DCC to tackle transport pollution. This should be part of the brief of the recently formed ECC/DCC Transport Steering Group. This group must be empowered to make proposals to both Councils and a Cabinet member given responsibility for implementing these AQAP Measures.

A programme manager should be tasked with coordinating the whole AQAP portfolio of measures and be answerable to both DCC and ECC (possibly through the Transport Steering Group or an Air Quality Steering Group which is *empowered*).

There is a risk that responsibility for progressing the Measures in this plan are diffused across the two Councils. Responsibility for each Measure needs to be made explicit (by identifying a named individual in each relevant authority) and their progress against delivering their Measure be tracked regularly. A *six monthly* progress report should be produced (rather than the proposed annual status report (ASR)) as a means of bringing urgency and focus to the AQAP's deliverables.

## Question 6: Do you agree with the proposed measures set out in table 5.1?

The Exeter Cycling Campaign welcomes most of the measures that are proposed in the draft AQAP but proposes that the following additional measures are essential in order to achieve the sustained improvements in air quality that are required..

The stated goals of the AQAP are bold. The measures to deliver improvements to our air quality need to be equally bold and urgent.

The Exeter Cycling Campaign is surprised that **cycling appears only twice in the Measures** in



Table 5.1 (and one of these is merely an



‘encouragement’ Measure). With transport-induced pollution making the biggest contribution to air quality we need to enable a wholesale shift to cycling and walking as normal modes of transport in the city. Getting people out of private cars and walking or cycling must therefore be given greater priority in the Measures laid out in the AQAP.

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

The Exeter Cycling Campaign offers in this report some additional measures that will *actively enable and prioritise* cycling and walking. This is the key to achieve the target pollution reduction: more effective than encouragement and promotion alone.

Addn'l AQAP Measure proposed by Exeter Cycling Campaign	Proposal from Exeter Cycling Campaign
Develop an overarching strategic plan for a dense cycling and walking network	Develop a long term strategic plan, based on the governments LCWIP <sup>5</sup> guidance, to provide a coherent, 'joined up' approach to development of a transport network which rebalances space and priority away from the current, subsidised, private motorist.

AQAP Measure 2	Proposal from Exeter Cycling Campaign
"Promote Car Clubs and CoBikes"	Make provision for Co-Bikes installation points in all new housing developments and make S106 funding requests to developers for this.

AQAP Measure 3	Proposal from Exeter Cycling Campaign
"Design and implement a new and enhanced public transport network and seamless multimodal travel"	<p>Invest in cycle hubs with high quality and secure cycle parking next to rail stations in and around Exeter.</p> <p>Adopt a city-wide 15 year strategic plan for a dense cycle network across the city. See the Exeter Cycling Campaign's proposed <a href="#">2030 Network Plan</a> and '<a href="#">Living Streets</a>' report.</p> <p>Develop a policy for managing a dockless bike hire scheme.</p> <p>Enhanced training for Planners and Highways Maintenance staff.</p> <p>Adopt and use best practice design guides for highway/junction design so that people walking and cycling are safe and streets are pleasant places.</p>

<sup>5</sup> LCWIP: Local Cycling & Walking Infrastructure Plan

# Response from Exeter Cycling Campaign to Exeter City Council’s Draft Air Quality Action Plan 2018

**“New and enhanced transport network means it is easier, more attractive and more cost effective for those living in the city to travel public and actively” (measure 3)**

The Exeter Cycling Campaign agrees that the only way to achieve sustainable improvements in air quality is to make a significant modal shift to sustainable transport modes, primarily cycling and walking.

Evidence from cities across the world is clear: this modal shift to cycling is achieved by building safe, connected and convenient cycle infrastructure. This means protected cycle paths on busy/fast roads, traffic-reduced roads in residential areas, ‘green paths’ through parks and safe junctions across the city. A wholesale plan for such a network is urgently required and the Exeter Cycling Campaign offers both the [2030 Network Plan](#) and the ‘[Living Streets](#)’ reports as foundations for this. Furthermore, modern design standards should be adopted by Devon County and Exeter City Councils so that public highways enable active travelers. See for example Manchester’s lead in adopting the (NACTO) [Global Street Design Guide](#).



Recovering ‘living streets’ in neighbourhood areas by filtering out rat-running car traffic with modal filtering interventions will not only reduce pollution but also help recover neighbourliness. In these traffic-reduced residential areas cycling needs to be further enabled by installing cycle ‘garages’. This is important in Victorian housing areas (e.g. Heavitree) where there is limited garage space for bike parking.

The city’s radial highways are the most direct and flattest routes into the city. These are the preferred desire lines for many who would cycle commute. Safe, protected cycle paths on these roads is necessary to open these highways to people to cycle. This will make the most effective use of space on the public highway since walking and cycling are the most efficient transport modes available<sup>6</sup>.

Delivering the goal of “New and enhanced transport network means” will require deeper technical skills within our Council Planning teams and a lifting of expectations about what can be achieved. The Exeter Cycling Campaign proposes enhanced training for Planners and Highways Maintenance staff so that the new transport network that the city requires

<sup>6</sup> **Seven times** more people can traverse a junction when travelling by bike than by car.

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

can be built. Visits to Councils and Authorities (and countries) that are succeeding in this should form an important (mandated?) part of the continuing professional development and learning for our city and county Planners and Engineers.

Good road design standards exist. They should be adopted and used by Devon and Exeter planners and engineers. Too often developments in Exeter still fall far short of best practice design.

Electric and autonomous vehicles will change the way that our public highways are used. Some of this could be beneficial. However, the Exeter Cycling Campaign cautions an unthinking acceptance that these will bring unalloyed benefits. Note in particular that some studies report that:

- Electric vehicle PM10 and PM2.5 emissions are comparable to those of conventional vehicles<sup>7</sup>
- Exhaust and non-exhaust sources contribute almost equally to total<sup>8</sup> traffic-related PM10 emissions.
- Non-exhaust sources account for 90% of PM10 and 85% of PM2.5 from traffic.<sup>9</sup>
- Autonomous cars are unlikely to reduce congestion<sup>10</sup>.

Care must therefore be taken not to unthinkingly suggest that electric autonomous vehicles will bring significant benefits to air quality. "Our cities need fewer cars, not just cleaner cars"<sup>11</sup> (Frank Kelly - professor of environmental health at King's College London and chair of the Committee on the Medical Effects of Air Pollutants).

Autonomous vehicles are likely to bring changes to the way public transport operates. Autonomous taxis could be cheaper than buses and could, with the correct road-charging regime, enable travel for people living in areas poorly served by buses.

AQAP Measure 4	Proposal from Exeter Cycling Campaign
"Design and implement a filtered permeability plan and corridor improvements"	<p>Filtered permeability solutions should be adopted on</p> <ul style="list-style-type: none"> <li>● Ladysmith Road</li> <li>● Hamlyn Lane</li> <li>● Vaughan Road</li> <li>● Regents Park / Homefield Road</li> </ul> <p>to make the Heavitree/Newtown/Whipton residential areas residential again.</p> <p>Progress the community-generated proposals for building healthy streets</p>

<sup>7</sup> See "[Non-exhaust PM emissions from electric vehicles](#)" Timmers & Achten (2016)

<sup>8</sup> See [Non-exhaust traffic related emissions, Brake and tyre wear PM](#) - Theodoros Grigoratos and Giorgio Martini 2014

<sup>9</sup> See "[Non-exhaust PM emissions from electric vehicles](#)" Timmers & Achten (2016)

<sup>10</sup> The Economist March 2018 "[The Autonomous vehicle technology is advancing ever faster](#)"

<sup>11</sup> [The Guardian 4 Aug 2017](#)

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

	<p>that have been gathered from residents across the city by the Exeter Cycling Campaign for Heavitree, Newtown and Whipton <a href="#">here</a> and simple filtered permeability solutions proposed across the city <a href="#">here</a>.</p> <p>Enhanced training for Planners and Highways Maintenance staff.</p>
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AQAP Measure	Proposal from Exeter Cycling Campaign
5	
"Workplace Parking Levy"	<p>Exeter businesses support measures to enable their staff to cycle. It is good for employee health and wellbeing and good for productivity.</p> <p>Be bold in proposing a workplace parking levy and hypothecate the income for walking, cycling and public transport investment.</p>

## Workplace Parking Levy

Businesses in Exeter have expressed strong support for enabling more cycling amongst their staff. Over 200 Exeter businesses supported the [Exeter Cycling Charter](#), including the city's major employers. These businesses recognise that enabling cycling is good for their employees and good for their business. The Exeter Cycling Campaign urges Councillors and Officers to be bold in implementing a workplace levy scheme and hypothecating the income generated for cycling, walking and public transport investments.



Care needs to be taken when considering the workplace parking levy in the light of the disruption that autonomous vehicles might bring to the transport network. It is quite possible that the introduction of autonomous vehicles increases the number of vehicles on the road<sup>12</sup>, particularly if we charge for parking rather than for road use. If parking becomes more expensive then autonomous cars could simply 'roam the streets' rather than being parked. Exeter's charging scheme therefore needs to disincentivise the activity we want to see less of (driving private cars on roads) and not unintentionally make this worse by actually charging for a proxy of driving (parking).

AQAP Measure	Proposal from Exeter Cycling Campaign
7	
"Support businesses with	The evidential basis for this measure is questioned.

<sup>12</sup> The Economist - March 2018: ["Autonomous-vehicle technology is advancing ever faster"](#)

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

sustainability advice “	<p>Set targets for the percentage of employees travelling actively / sustainably for Exeter businesses and request / demand that these are reported half-yearly and published widely.</p> <p>Strengthen this by running sustainable (transport) awards for Exeter businesses and/or levies for businesses breaching the Council-set targets.</p>
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## The effectiveness of merely providing ‘sustainability advice’

The AQAP proposes (measure #7) to “Support businesses with sustainability advice” in the (unquantified) hope that this will improve air quality.

The Exeter Cycling Campaign questions the efficacy of merely giving sustainability advice and wonders what evidential base this measure is built on. Businesses are not ignorant of sustainability measures that could be adopted and merely providing advice is unlikely to change individual or corporate behaviour.

A more effective measure would be to set targets, for example, for the percentage of employees travelling actively / sustainably for businesses and request / demand that these are reported half-yearly. This could be strengthened by running sustainable (transport) awards for Exeter businesses and/or levies for businesses breaching the Council set targets.

AQAP Measure 8	Proposal from Exeter Cycling Campaign
“Access restrictions/ charging”	Charge for the use of valuable road space, variable by time of day and zone travelled (this is a ‘congestion charge’). Charge separately according to pollution emitted from a vehicle.

## “Restrictions on what vehicles can enter certain parts of the city at certain times of day, potentially with a charge for vehicles” (measure #8)

The public highway is the County’s largest and arguably most valuable asset. It is a finite resource that is currently rationed by queuing (i.e. congestion).

Technological tools now available enable the Council to charge for the use of valuable road space. This needs to apply to whole zones of the city rather than just specific roads (to prevent rat-running through residential areas to avoid charging on arterial roads).



# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018



Congestion charging for road use should be a variable charge based upon time of day and zones of the city travelled through. This is a 'congestion charge'.

Exeter should follow London's lead and charge *separately* for congestion and pollution. Separate congestion charges (CC) and pollution charges (in designated low or ultra-low

emission zones) gives the Councils the ability to target specific vehicles with greater granularity.

The charge should be levied highest on the modes of transport we seek to discourage (private cars). The AQAP suggests a pollution charge would be targetted at HGV. Care must be taken not to discourage PSVs<sup>13</sup> as a result. This would be a misapplication of this charging.

Evidence from London's congestion charging scheme shows how it can reduce private car, van and HGV volumes whilst increasing cycling and bus/coach volumes (and also *increase* average speeds). The option of introducing congestion charging should not be dismissed by the Councils.

**Table 6 Average traffic flows within the charging zone before and after implementation of the CCS**

Vehicles entering charging zone (7.00 am to 6.30 pm)	Average speed	Cars	Taxis	Vans	Pedal cycles	Motor cycles	Bus and coach	HGVs and other	TOTAL (excluding cycles)
May 2002 - actual traffic flows (before CCS implemented) (A)	13 km/h	390,000	110,000	110,000	25,000	50,000	27,000	35,000	722,000
Forecast traffic flows for 2003 if CCS had not been implemented (B)	N/A	391,873	110,528	110,528	25,120	50,240	27,130	35,168	725,467
Feb/March 2003 - actual traffic flows (after CCS implemented) (C)	17 km/h	240,000	120,000	100,000	27,000	55,000	29,000	32,000	576,000
Change in traffic flow due to CCS (C - B)	4 km/h	-151,873	9,472	-10,528	1,880	4,760	1,870	-3,168	-149,467
Percentage change	31%	-39%	9%	-10%	8%	10%	7%	-9%	-21%

Source: Central London Congestion Charging Scheme – 3 months on (except Estimate of traffic growth for 2003 if CCS had not been implemented – calculated using TEMPRO traffic growth factors for the London Boroughs in which the CCS operates)

There are important lessons from other cities' charging regimes and these need to be taken on board ([see here](#)). The AQAP Measure 8 description that "Restrictions on what vehicles can enter certain parts of the city at certain times of day, potentially with a charge for vehicles that do not meet the relevant criteria (**focusing on goods vehicles**)" risks not being targeting

<sup>13</sup> PSV: Public Service Vehicle

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

appropriately. Air pollution problems, as well as congestion and inactivity challenges, mean we must not exempt single-use private cars from congestion charging.

Autonomous vehicles know exactly where they are at all times, making it much easier to introduce fine-grained road tolls and congestion charges base on time of day, traffic levels.



Private companies could be invited to bid for contracts to establish and run this service for the Councils.

AQAP Measure 10	Proposal from Exeter Cycling Campaign
"Policies deliver development where car travel is not needed"	Create <b>Development Briefs</b> for new development areas with SPD status.

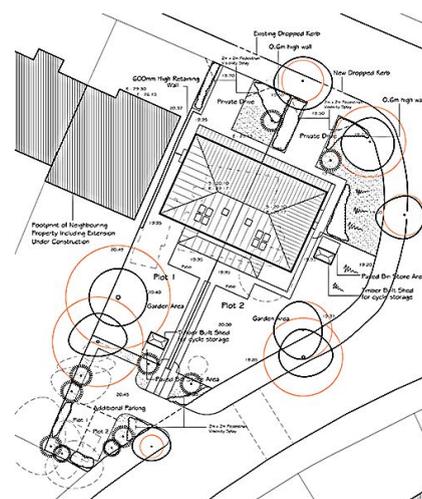
## Development Briefs for new housing developments

With 23000 new homes being built in and around Exeter in the next decade we have a generational opportunity to shift the preferred mode of travel from private car to active or public travel. This is an opportunity that is currently being missed.

Developers are making planning applications for new housing estates that give scant priority to travel modes other than the private car.

Exeter Cycling Campaign endorses the proposal from Exeter City Council's former Transport Policy Manager, Russ Hussey, who recently proposed that we "*... need to see development sites in their wider sustainable transport context, and to be aware of opportunities and constraints. Pre-application discussions should always include consideration of opportunities to improve networks for those who walk and cycle, and it is important for City planners to involve County colleagues at an early stage.*"

*Better still would be to produce **development briefs** with SPD (supplementary planning document) status for such sites"*



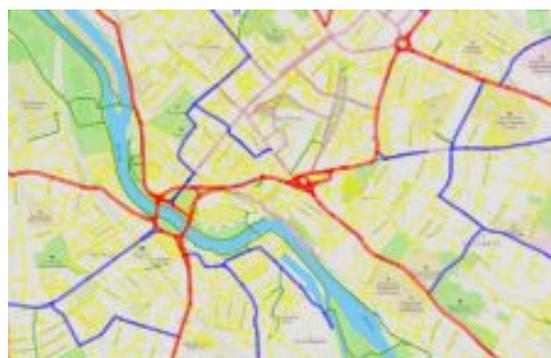
# Response from Exeter Cycling Campaign to Exeter City Council’s Draft Air Quality Action Plan 2018

The current development strategy of the Exeter and surrounding Councils appears to be to provide no amenities in new development areas. This is making pollution-free lifestyles more difficult.

AQAP Measure 11	Proposal from Exeter Cycling Campaign
<p>“Connections to new transport network mean it is easier, more attractive and more cost effective for those living outside the city to access the city by public and active travel”</p>	<p>The new transport network must include delivery of safe, convenient and connected cycle routes across the city.</p> <p>This includes protected cycle routes along the arterial and orbital routes..</p> <p>Alternative transport solutions need to be more actively considered as alternatives to the typical ‘more cars/roads’ proposals still being put forward.</p> <p>For example, the recent proposal to add a new road at Summer Lane, Exmouth with the aim of ‘easing’ commuting into Exeter could have been better delivered with electric bike hubs, secure cycle parking and building safe cycle junctions. Similarly, the proposal in Feb’18 from IKEA to add a ‘temporary’ 197 car park for staff betrays a lack of imagination for building in alternative travel modes.</p>

## New and enhanced travel network must include strategic cycle routes

To enable the desired shift out of the private motor car the “new transport network” must include delivery of safe, convenient and connected cycle routes across the city.



This includes protected cycle routes along the arterial routes into the city and key orbital routes such as Polsloe Rd/Barrack Rd, and Cowick lane/Buddle Lane/Exwick Rd since these are the preferred desire lines, and generally flattest routes, for cycle commuting.

The [2030 Network Plan](#) shows where these strategic arterial protected routes might be.

## Park and Ride (Measure 12)

The Exeter Cycling Campaign notes the suggestion in Measure 12 that ‘Park and Ride’ schemes will be developed and that these will “make ... public transport or active travel more attractive than driving into the city centre”. The evidence to support this statement needs to be carefully examined. Park and Ride schemes will only make it more attractive to take the bus if car parking spaces in the city centre are removed as part of these schemes.

## Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

We would encourage that any Park and Ride (P&R) schemes that might be implemented are made into proper Park and **Cycle** schemes. Building high quality, secure cycle parking and bike hire at these P&R locations will enable the multi-mode transport options that the city needs.

AQAP Measure 12	Proposal from Exeter Cycling Campaign
<p>“Planning policy means it is hard for those living in new development outside the city to access the city entirely by private car”</p> <p>“Develop park and ride and new public transport routes. Consider the use of traffic management or access restrictions which make park and ride, public transport or active travel more attractive than driving into the city centre”</p>	<p>Any Park and Ride schemes that might be implemented should include Park <b>and Cycle</b> provision - with safe, secure cycle parking/garages and bike hire so that multi-mode travel is enabled.</p> <p>Any increase in the number of parking spaces through Park &amp; Ride schemes should be matched with an equal reduction in parking spaces within the city.</p>

AQAP Measure 13	Proposal from Exeter Cycling Campaign
<p>“Changes to parking charges to discourage car travel in peak times”</p>	<p>Incrementally remove parking in areas and roads where cycle commuting should be enabled.</p> <p>For example: Incrementally remove car parking along Southernhay West &amp; East (as a precursor to making these roads car-free and thus unlocking Southernhay as a quiet, green space)</p> <p>Incrementally remove car park along Union Road (probably in University summer holidays) to enable the E4 strategic cycle path to be built.</p>

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

	<p>Incrementally remove parking along Polsloe Road to enable a safe cycle path to be built along this strategically important north-south route.</p> <p>Adopt a Community Congestion Parking Charge across the city. (see <a href="#">Bath city's proposal</a>).</p>
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## Parking

Cities that have been successful in moving people onto active travel or public transport travel options have achieved this by making car use less convenient.

Copenhagen embraced a policy of incrementally and consistent removal of motor vehicle parking from its central area and replaced this with better public spaces, walking and cycling facilities.<sup>14</sup>



Exeter should follow this lead and incrementally remove parking in the city centre (Southerhay West & East), along Union Road (E4 strategic cycle route) and Polsloe Road (strategic north-south route).

The city must identify spaces and routes that should be prioritising people walking and cycling. In these areas passage and parking of private cars should be phased out (e.g. Polsloe

Road).

Many of the public highways in Exeter remain a free resource used by people to park cars. A city-wide Community Congestion Charge for parking on **all** the city's public highways would provide income for sustainable transport alternatives and a means of properly, and fairly, valuing and pricing road space (see the [proposals being considered for Bath city](#)).

Many more cycle parking stands, including covered stands, must be built across the city as part of making journeys by bike more attractive. Furthermore, these should be located on the public highway rather than taking away space from people walking.

AQAP Measure	Proposal from Exeter Cycling Campaign
14	
"More things to	The Exeter Cycling Campaign questions the benefit of this measure for

<sup>14</sup> London Travel Watch: ["Cycling in London" 2018](#)

# Response from Exeter Cycling Campaign to Exeter City Council’s Draft Air Quality Action Plan 2018

see and do are developed in the City Centre to encourage longer stays”	improving air quality. We propose deprioritising or dropping this measure.
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## “More things to see and do are developed in the City Centre to encourage longer stays”

The Exeter Cycling Campaign questions the evidential base of this measure and the efficacy of the proposal of “more things to do in the city” as a means of improving air quality. The fact that the AQAP can’t quantify the targeted benefit this would bring to air pollution suggests this measure is of very marginal effect.

AQAP Measure 25	Proposal from Exeter Cycling Campaign
“Continuous analysers replaced, including capacity for PM2.5 monitoring at two locations in the city”	Exeter Cycling Campaign recommends that the air quality monitoring network be enhanced to make more representative measurements in key areas and that these measurements be used to compare actual pollution levels to agreed international standards.

The operation of an air quality monitoring network in Exeter is welcomed, as are steps to reduce pollution levels. However limitations in the current network fail to capture the true levels of exposure to vulnerable groups. A particular problem is measuring the exposure of children who travel to school by foot or bicycle on routes adjacent to main commuter routes (e.g. Topsham Road, Alphington Road). Many of the existing sensors measure average levels over long periods of time and fail to adequately represent peak values during periods of congestion. In addition almost all the sensors are sited at higher levels and further from roads than children and adults who inevitably will suffer from greater pollution levels. It is recommended that the monitoring network be enhanced to make more representative measurements in key areas, to measure particulate matter (PM) and that these measurements be used to compare actual pollution levels to agreed international standards. Some key areas are omitted from the existing monitoring areas such as York Rd and Prince Charles Rd.

### Question 7: Do you have any comments on the key performance indicators listed in table 5.1?

The Measures listed in Table 5.1 should be **assessed and ranked**, based on evidence and other cities’ experience, in terms of their likely impact upon air quality. See for example

# Response from Exeter Cycling Campaign to Exeter City Council’s Draft Air Quality Action Plan 2018

[Southampton’s Air Quality Action Plan \(2010\)](#) which ranked their Measures in terms of air quality impact from ‘High’ to ‘Negligible’.

Effort and investment into Exeter’s AQAP measures should then be focused on the measures with the highest likely impact on air quality improvement.

(Note, for example that in Southampton’s 2010 AQAP the 'public awareness and information strategy' Measure was ranked as having "*negligible*" benefit in improving air quality whereas the Measure to assess “active travel schemes (walking and cycling)” was assessed as having "*high*" impact upon improving air quality - one of only four out of 44 measures in the Southampton AQAP having this High impact ranking).

## Question 8: Do you have any comments on the Target Pollution Reduction for each proposed measure in table 5.1?

See responses to Question 7.

## Question 9: Do you think that the proposed measures set out in table 5.2 will work over the period 2018 to 2022 towards delivery of the vision?

The Exeter Cycling Campaign supports the detail that is set out in table 5.2, but it asserts that measures that rely on provision of advice and encouragement can only succeed if they are accompanied by measures that will actively enable and prioritise cycling and walking and the use of public transport.

For detail of additional measures proposed by the Exeter Cycling Campaign, see the Campaign’s response to Question 6, above.

AQAP Measure 3	Proposal from Exeter Cycling Campaign
<p>“Design and implement a new and enhanced public transport network and seamless multimodal travel”</p>	<p>Invest in cycle hubs with high quality and secure cycle parking next to rail stations in and around Exeter.</p> <p>Adopt a city-wide 15 year strategic plan for a dense cycle network across the city. See the Exeter Cycling Campaign’s proposed <a href="#">2030 Network Plan</a>.</p> <p>Develop a policy for managing a dockless bike hire scheme.</p> <p>Enhance secure cycle parking at train stations in and around Exeter.</p> <p>Learn from other cities that have introduced dockless bikes and from this develop a sensible dockless bike hire policy for Exeter.</p>

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

	<p>Enhanced training for Planners and Highways Maintenance staff.</p> <p>Adopt best practice design guides.</p>
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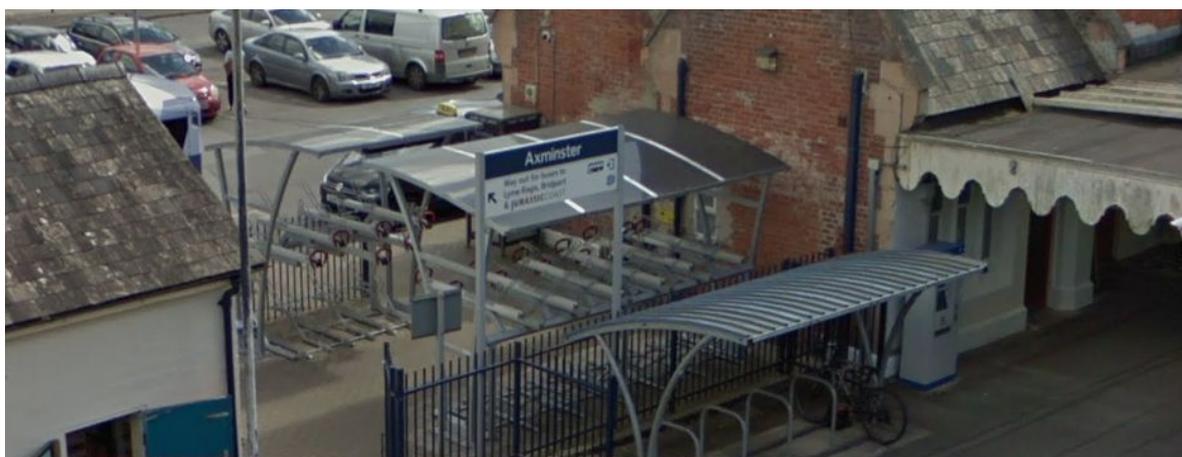
## Multi-mode travel

The high proportion of Exeter commuters originating from outside the city means that investment must be made in making multi-mode journeys easier.

Cycle parking facilities in the train stations in and surrounding Exeter should be improved to provide high quality, secure cycle parking (and safe access to this parking) at these stations. The provision for high quality, secure cycle parking at train stations is patchy:

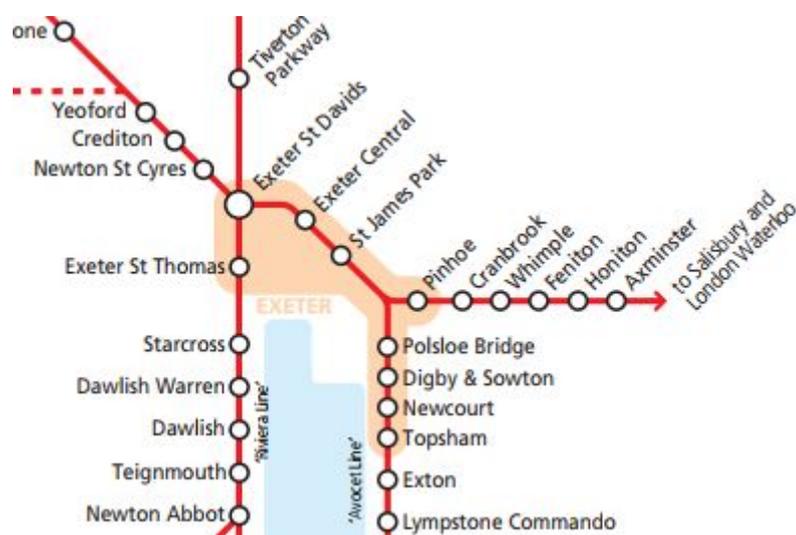


Axminster is well provided for:



But other stations require further investment to make multi-mode transport realistic.

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018



## Dockless Bikes

The potential to get more people cycling is huge, and dockless bike hire schemes are a way to make cycling more accessible as a mode of transport. Dockless bike schemes across the world have not been without their difficulties



though. It is important therefore that Exeter City Council draws out the lessons from cities that have introduced dockless bikes and from this develops a sensible dockless bike hire policy. Such a policy will ensure a dockless bike hire scheme enables more people to cycle without adversely impacting other active travellers or citizens.

[Transport for London's Dockless Bike Policy can be found here.](#)

AQAP Measure Detail 6	Proposal from Exeter Cycling Campaign
<p>“Provide advice and support to companies to change their travel habits and reduce emissions, showing the link to increased profitability and productivity.</p>	<p>Exeter Cycling Campaigns questions the actual benefit for achieving behavioural change from this measure.</p>

# Response from Exeter Cycling Campaign to Exeter City Council’s Draft Air Quality Action Plan 2018

## The effectiveness of Public Information campaigns

The AQAP suggests that:

*“The exposure of people in the city to air pollution will also be reduced because: Decision makers have clear understanding of air pollution and its impacts; Residents, employers and visitors understand the impact of air pollution and the effect of their travel choices;”*

The Exeter Cycling Campaign has doubts about the efficacy of such public information actually achieving behavioural change. The examples of plastic bags, unhealthy eating and inactive lifestyles suggest that providing information will not unlock changes in lifestyle. The Campaign questions the evidential basis upon which this measure is based.

Since the AQAP itself admits that the effect of such information is “Not possible to quantify” then the Exeter Cycling Campaign suggests that this measure is not emphasised and is removed from the AQAP.

AQAP Measure Detail 20	Proposal from Exeter Cycling Campaign
<p>“High quality destination parks, play areas, sport and leisure facilities across the City. Promote and encourage Parklife activities and active lifestyles.”</p>	<p>This Measure is of questionable benefit for improving air quality. Deprioritise or drop this measure.</p> <p>The AQAP should be enabling citizens to build walking and cycling into <b>daily routines</b>.</p> <p>Drop the reference in Appendix B to ““Dedicated pedestrian and cycle routes will be improved, but these road users will not (at this stage) be given priority at all junctions”</p>

## Too little emphasis on building active travel into everyday lifestyles

Measure 20 in the AQAP proposes “High quality destination parks, play areas, sport and leisure facilities across the City. Promote and encourage Parklife activities and active lifestyles”

The Exeter Cycling Campaign has doubts about the effectiveness of creating sporting events and leisure facilities as a means of improving air pollution. People most commonly *drive* to these events and locations. These are not effective in reducing air pollution.



# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018



The AQAP should be enabling citizens to build walking and cycling into **daily routines**. This is the main recommendation from the 2016 Public Health England (PHE) report ([“Working Together to Promote Active Travel”](#)), which is based upon international evidence of ‘what works’. This means that normal journeys to work, school, college, the shops, to the gym are done by cycle or walking.

To make this happen requires safe, connected and convenient cycle and walking paths across the city. It also requires that cycle and walking journeys are *more convenient* than driving. The option to drive needs to be less convenient, more realistically costed and take longer. This is how cities that are making the modal shift away from the private car have succeeded.



A dense network of cycling and walking paths, traffic reduced residential streets and safe, properly-design junctions is required to achieve this.



The draft AQAP states in Appendix B that *“Dedicated pedestrian and cycle routes will be improved, but these road users will not (at this stage) be given priority at all junctions”*. This is a baffling statement and points to an attenuated vision and ambition for what can and needs to be done in our city to reduce private car use and enable cycling and walking. It also contradicts the Councils’ stated adoption of the ‘transport hierarchy’. We would propose this statement is dropped from the final Air Quality Action Plan.

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

AQAP Measure Detail 22	Proposal from Exeter Cycling Campaign
"Access Fund and cycle/walking network"	<p>Investment in cycle skills doesn't shift many people to regularly using the cycle as the normal transport mode <i>unless</i> there are safe, convenient and connected cycle paths for the newly-skilled people to use.</p> <p>We must not think that promotional activities alone will achieve the modal shift required to deliver the AQAP targets.</p> <p>What is needed is safe cycling infrastructure so that people can choose to safely travel by bike.</p>

## The part that 'improving skills' plays in affecting a modal shift to cycling

Over recent years the central government has invested money in Bikeability and other schemes to improve the cycling skills of children and adults. This is a worthy endeavour but appears to be having a marginal effect upon the number of people cycling. The percentage of people who commute by bicycle has stayed stubbornly low (nationally) at around 2% for some years now (and the number of cycle trips has dropped by 16% since 2006)<sup>15</sup>.

Exeter increased its cycle commuting rate to 6% after the investment in cycling infrastructure as part of the Cycling Demonstration Town initiative in 2005.

The learning from this is that spending on cycle skills training doesn't shift many people to using the cycle as the normal transport mode. What is needed is safe cycling infrastructure so that people can choose to safely travel by bike.



AQAP Measure Detail 24	Proposal from Exeter Cycling Campaign
"Maximise efficiency of existing highway network"	<p>Smoothing traffic flow does not allow for the most efficient use of the road network. As many progressive cities have discovered, it requires that the highest priority on increasingly scarce road space is given to the vehicles and modes that make best use of it: pedestrians, cyclists and buses.</p>

<sup>15</sup> DfT ['Cycling & Walking Statistics England 2016'](#)

# Response from Exeter Cycling Campaign to Exeter City Council’s Draft Air Quality Action Plan 2018

## How to maximise the efficiency of the existing highway network

The AQAP suggests (Measure 24) using “*technological advancements to better understand the operation of the network and adapt its control to manage traffic effectively*” as a means of maximising the efficiency of the highway network.

The Exeter Cycling Campaign cautions an over-dependence upon attempts to ‘smooth / speed traffic flow’. Evidence<sup>16</sup> from London where this was tried suggests that attempts to smooth traffic flow “*.. is at odds with safe walking and cycling conditions*” which, of course, are the very transport modes we need more people to adopt.

The report observed that “*in practice, smoothing traffic flow and increasing road capacity have become confused and a higher priority has been placed on motor traffic flow. The result is that pedestrian and cyclist interests have suffered*” and with this, of course, a deterioration in air quality.



The report summarises their learning: “*smoothing traffic flow does not allow for the most efficient use of the road network which, as many progressive cities have discovered, requires that the highest priority on increasingly scarce road space is given to the vehicles and modes that make best use of it: pedestrians, cyclists and buses*”

You can move **seven times** more people through a junction when they are riding bikes compared to driving cars<sup>17</sup>. To maximise the efficiency of the network we need to be getting people out of cars and onto bikes - and this is done by making it safe to ride by building cycling infrastructure. This is the only way of improving our air quality whilst moving more people across the city on our public highways.

AQAP Measure Additional proposed detail	Proposal from Exeter Cycling Campaign
Develop an Exeter ‘Local Cycling and Walking	Utilise government policy to “make walking and cycling the natural choices for shorter journeys, or as part of a longer journey”.

<sup>16</sup> Campaign for Better Transport 2011 report “[Every Journey Matters? Does smoothing traffic flow work for everyone?](#)”

<sup>17</sup> Cycling Embassy of Great Britain: [Capacity](#)

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

Infrastructure Plan' (LCWIP)	Embrace the Department for Transport's Cycling & Walking Investment Strategy (CWIS) and develop an Exeter 'Local Cycling and Walking Infrastructure Plan' (LCWIP) using DfT guidance.
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## Cycling & Walking Investment Strategy

The Department of Transport (DfT) issued their [Cycling and Walking Investment Strategy](#) (CWIS) in 2017. This aims to “*make walking and cycling the natural choices for shorter journeys, or as part of a longer journey*”. This is a key government transport policy which asks local authorities to develop their own Local Cycling and Walking Infrastructure Plan (LCWIP). DfT produced [guidance](#) on how to do this.



**Cycling and Walking Investment Strategy**

This is clearly an important tool for building cycling and walking into a city and yet surprisingly the AQAP makes no reference to this. The AQAP must commit to developing an LCWIP for Exeter within 12 months and build this into the transport funding plan for the next five years.

# Response from Exeter Cycling Campaign to Exeter City Council's Draft Air Quality Action Plan 2018

## Conclusions

There is no safe level of pollution.

There can be no complacency: we must be bold in embracing measures that will improve our air quality.

The aspirations of Exeter City Council's Air Quality Action Plan are high - which is welcomed. However, the proposed Measures are mixed, their quantification of goals weak and prioritisation missing.



The Exeter Cycling Campaign is convinced that enabling a wholesale shift from private car to cycling is the most effective means of tackling air pollution and there is significant opportunity to grow the modal share of cycle commuting in the city.

Measures to 'encourage' cycling and 'information campaigns' are of limited effectiveness in achieving this modal shift. Cities that have been successful at improving air quality by getting more people cycling have done this by prioritising people who cycle or walk by building safe infrastructure and nudging people out of their cars by making it less attractive.

The suite of proposals in this report from the Exeter Cycling Campaign will, when adopted, enable Exeter to start to improve its air quality.