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Dear Mr Smith

Air Quality Action Plan consultation

The Aberdeen Cycle Forum welcomes the opportunity to respond to the City Council's draft Air Quality Action Plan. We support the City Council's active monitoring of pollution levels in the city center and its identification that a range of measures over a period of time are required in response to actual and predicted exceedences of NO_x. We also recognise that buses and HGV's, as well as cars, are active contributors to pollution levels in the city centre. People's health, as well as the urban environment, would be well served by reductions in general traffic levels and associated reductions in pollution.

1. General Comments

1.1 The Cycle Forum's view is that the key target of promoting modal shift towards more sustainable modes of transport has to be the basis for the plan. Technical solutions involving low emission vehicles have their place, but without measures to reduce general traffic levels, then congestion, hotspots of pollution and an unpleasant city centre environment will persist. The necessity of promoting modal shift should be more explicitly emphasised as a key principle in the plan.

1.2 It is clear that the WPR will have only a minor impact on city centre traffic – the plan acknowledges a barely noticeable reduction of 5%. This will easily be overwhelmed by general traffic growth and by developments such as Guild Street, with parking for well over 1000 cars, which will attract more traffic into the city centre. Moreover, if current plans to build a third Don crossing, and to create extra road space in the Berryden and College Street corridors come to fruition, these will only serve to bring more vehicle traffic into and through the city centre. There is now ample evidence that more road capacity induces traffic growth. It is vital that these new developments are assessed for their impact on city centre traffic levels, induced traffic impacts and pollution. This seems to be a case where the councils thinking is not sufficiently 'joined up' – the measures in the Plan will have to work very much harder to achieve the goal of reduced pollution levels if these other proposals go ahead. And these roads plans will do nothing

to promote modal shift, as they favour the private car, and thus run counter to what should be the key principle referred to in the previous paragraph.

2. Specific Comments

2.1 Cycling is a non-polluting form of transport. It is ideal for city commuting and for short utility trips. Almost every adult is able to cycle and cycling is both affordable and socially inclusive. Other cities in the UK, and in Europe, have high levels of utility cycling and ambitions to support cycling even further. Every journey by cycle rather than car is an absolute pollution gain. It is striking, therefore, that the Plan has scant mention of the contribution that cycling can make to improving city centre air quality, most particularly in section 4 where the elements of the Action Plan are outlined.

2.2 The Aberdeen Cycle Forum considers this to be a serious weakness in the overall Plan. Research shows that a significant proportion of journeys are under 5 miles, an ideal cycling distance. We believe, therefore, that the Plan needs to identify ***thesupport and promotion of cycling*** as a key proposed action, initially for both *theshort and the medium terms*.

2.3 This would require measures such as:

- a comprehensive network of signed cycling routes into and through the city centre
- associated measures to improve cyclist safety
 - cycle parking at leisure, retail, transport and workplace sites
 - road safety measures especially on speeding and driver awareness
 - proactive promotion of cycling as an everyday form of travel.

2.4 This should not be seen as a stand alone set of measures. On the contrary, supporting cycling in this way would enable other elements of the Plan to be better realised; for example, Green Transport Plans (4.3.6) which can take advantage of an improved cycling infrastructure. And raising public awareness about the problem of air quality (4.3.2) needs to be associated with advice on what positive things people can do in response, and considering cycling for trips into and around the city centre should be one of the options.

3 Concluding comments

3.1 The Aberdeen Cycle Forum is supportive of measures to reduce traffic levels and associated air pollution in the city centre. We believe cycling has a contribution to make to improving air quality in the city centre. However, to achieve the very real benefits that cycling can bring needs active support and promotion. The omission of this from the draft plan is, we believe, a serious weakness. We hope that the final version addresses this and includes cycling as a key component of the overall strategy to tackling air pollution. The Aberdeen Cycle Forum would be happy to work with the council as it develops its response to air pollution in the city centre.

Yours sincerely,
Aberdeen Cycle Forum