Dear Angela,

We heard that you are accepting comments on 'The Local Plan and its Implications for air Pollution'.

Spokes East Kent Cycling Campaign is concerned with promoting cycling as a viable option for every day travel for people of all ages.  Along with direct health benefits and the reduction of congestion this also reduces pollution.

We do not believe that the emerging local plan and its associated transport strategy will lead to the improvement of air quality in the Canterbury area, in fact we believe that at least in the short term it will lead to a worsening of air quality.

SPOKES understands that Canterbury is not currently compliant with the Air Quality Directive of 2008.  This year there have been 17 breaches of the ozone limit and 11 last year (only 10 allowed per annum).

We also understand that the current air quality modelling used for the local plan has not used revised emissions guidance from 2016 and will therefore substantially underestimate emissions levels from vehicles.  The High Court ruling means that this modelling is invalid.

The ruling also states that emissions should be brought in line as soon as possible.  Outside of the ruling, motor manufactures have been given extra time to comply with current standards, so even when they do, it will take many years for older cars to be replaced with newer, cleaner models.  Standards will also be tightened further over the years, so a vehicle sold in 2017 that might actually be compliant with the EURO6 standard will quickly become outdated by newer standards.  Electric vehicles are becoming available but they are still in their infancy, Bloomberg predicts that even by 2040 electric cars will only make up 35% or car sales [1].  It may be decades before the majority of cars, delivery vehicles and buses on our roads are replaced with cleaner alternatives.

Over the last 20 years, despite limited funding, Canterbury City Council has had some success in helping to create infrastructure for cycling as well as public transport improvements.  Despite increasing demand for travel they have managed to keep congestion fairly constant.  However, we now know that pollution is much more deadly than we previously thought and that motor vehicles, in particular those powered by diesel engines, produce much more pollution than their manufactures have been claiming.  Despite Canterbury City Council's best efforts, Canterbury still has a long way to go to achieve the modal shift towards less polluting forms of transport that some other Cities have.  In addition, the Local Plan is anticipating a significant addition of housing.

There is plenty of empirical evidence to show that when infrastructure is changed to cater for bikes as well as cars it is possible drive modal shift.  It was recently reported that in Copenhagen bikes now outnumber cars [2].  According to the 2011 census just 2.7% of trips to work in Canterbury were by bike versus 55% driving in a car [3].  In York it was 11.4%, Oxford 17.6% cycle and in Cambridge it is 29.9% [4]. On the continent, Groningen in the Netherlands has between 31 and 55% [5], and Freiburg in Germany has 27% [6].   Note that the figures above for the continental cities may not be directly comparable with those for the UK cities but they are at least indicative.

Although not all car journeys can be replaced by foot, bike or public transport, studies have shown that around 50% of drivers would like to reduce their car use [7].  Traffic surveys in Canterbury show that 24% of the people who drive into Canterbury are travelling less than 3 miles and another 32% are commuting from within the Canterbury district [6].  There is therefore potential for a significant modal shift towards people using bikes and public transport.

When comparing Canterbury with cities that have a higher modal share of people on bikes it can be seen where infrastructure is lacking.  There should be more routes like the Crab and Winkle Way that offer motor traffic free routes between major towns, connecting villages along the way.  Maintenance of routes must be improved, many of the off road routes are muddy and often flooded during the winter.  Marketing needs to be improved, sometimes people don't even know that such routes exist.  There are no straightforward routes across or around the centre of Canterbury.  For example: the Mountifeld development which is being planned against the emerging local plan and transport strategy does not currently provide any adequate routes into Canterbury, it does not provide a safe route to cross the A28.  There is in-fact no safe route to cross the A28, without dismounting, between the London Road Roundabout on Rheims Way and Military Rd at Artillery St.  This 1.5mile section of the A28 runs between centre of Canterbury and this southern area that includes Christ Church, Canterbury College, numerous schools, the hospital, residential areas and the commercial area of Wincheap.  The numbers of short journeys around and across this section must be significant, but its current configuration makes it hostile towards potential bike riders.  Any plan to change modal shift in travel habits in Canterbury would surely need to tackle this as a priority.

Canterbury City Council has created a local plan and associated transport strategy that attempts to cater for housing demand and also make transportation improvements given the funding that they believe will be available.  There is no guarantee that suggested improvements will even be made as potential funding is uncertain.  The density and distances of the new housing developments from centres of employment, shopping, leisure and public services along with minimal planning for infrastructure to cater for people on bikes or foot and public transportation is bound to lead to an increase in motor traffic,  which in turn will increase pollution.  Given that the current pollution modelling is based on outdated methods, pollution will rise even further.  The local plan should ensure that new developments enhance the liveability of the area for new and existing residents.  With the absence of any significant external funding, externalities like congestion and pollution should be properly addressed as part of the developments.  These externalities should not be under estimated.  An underestimation of these externalities will mean that their effects will be paid for by the community in terms of risks to health, congestion and the associated economic costs.

In summary we would like to see the air quality modelling used in the plan updated to current standards.  We would also like to see the plan and associated Transport Strategy updated to drive modal shift towards sustainable and active travel methods.  It has been proven that investment in the right infrastructure can make cycling a much bigger part of local transport systems.  This in turn has benefits for health, reduced congestion and reduced pollution.

Yours sincerely,

Matt Banbury

SPOKES East Kent Cycle Campaign

[1] - ELECTRIC VEHICLES TO BE 35% OF GLOBAL NEW CAR SALES BY 2040 - Bloomberg <https://about.bnef.com/press-releases/electric-vehicles-to-be-35-of-global-new-car-sales-by-2040/>

[2] - Two-wheel takeover: bikes outnumber cars for the first time in Copenhagen – The Guardian <https://www.theguardian.com/cities/2016/nov/30/cycling-revolution-bikes-outnumber-cars-first-time-copenhagen-denmark>

[3] Canterbury District Transport Strategy 2014-31  -  Page 9 <https://www.canterbury.gov.uk/media/949413/Canterbury-District-Transport-Strategy-with-addendum.pdf>

[4] 2011 Census Analysis - Method of Travel to Work in England and Wales Report

[http://webarchive.nationalarchives.gov.uk/20160105160709/http://www.ons.gov.uk/ons/dcp171766\_299766.pdf](http://webarchive.nationalarchives.gov.uk/20160105160709/http:/www.ons.gov.uk/ons/dcp171766_299766.pdf)

[5] Cycling Mode Share Data for 700 Cities

<http://www.cityclock.org/urban-cycling-mode-share>

[6] National Institute for Health and Care Excellence

<https://www.nice.org.uk/advice/lgb8/chapter/facts-and-figures>

[7] Page 9, A Sustainable Transport Strategy for Canterbury – Dr Lynn Sloman <http://www.transportforqualityoflife.com/projects/>