

Exeter Low Emission Strategy (2015-2018) Responses to Consultation

Exeter City Council's Low Emission Vision:
"To continue to support a vibrant and growing economy whilst reducing emissions that are harmful to both human health and the environment"

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1. Introduction

The following document provides the results from the two stages of public consultation that were completed as part of the Exeter Low Emission Strategy. An initial online survey was conducted in September 2014 to gather the views of as many people in the Exeter areas as possible before the strategy measures were developed. The survey asked respondents how important they thought it was for the Council to take action to reduce emissions. They were also asked how important they felt a range of broad topic areas should be as part of the strategy.

In total the online survey received 163 replies. Of these responses 61% of people felt that it was either important or very important that: *“the City Council should lead on reducing air pollution and carbon emissions for the city of Exeter and its citizens”*.

The table below provides a summary of responses to the survey. The table has been ranked in terms of the percentage of respondents who replied that the issue was important when tackling air quality in Exeter.

Most important factors within the LES to online survey respondents	Percentage
Encourage bus operators to make improvements to their fleet and lower emissions	69%
Promote more sustainable travel choices (e.g. walk, bike, bus, car share, train, park & ride)	65%
To work with the highway authority (Devon County Council) to improve the efficiency of main road routes	61%
Encourage the use of cycling infrastructure (e.g. cycle lanes, parking, etc)	60%
Design new housing and office developments that promote low emission transport	57%
Help businesses to promote sustainable travel options to their employees	52%
Raise awareness of effects of poor air quality and the benefits of taking action in and around Exeter	46%
Work with affected communities to find ways to reduce their exposure to poor air quality	45%
Reduce emissions from Council vehicles	42%
Refresh the Council green travel plan	40%
Assist businesses to benefit from more efficient delivery of goods and servicing	40%
Encourage taxi and private hire operators to use more electric and low emission vehicles	39%
Enhance the Council's Green Accord which sets out the environmental standards we expect of our suppliers.	36%
Assist organisations in Exeter to apply for Government grants to help fund low emission vehicles.	29%

2. General Comments

The survey also contained a free text section, where respondents could make their own comments. A large range of suggestions were made, which are summarised below.

Bus and Park & Ride

Respondents used the free text box to suggest incentivising the use of public transport by subsidising lower fares (especially for children). More frequent and reliable services, extended routes, simplified or integrated ticketing systems, promotions and targeted subsidies for families who do not own a car, or who regularly choose alternative transport modes were all suggestions raised.

Many people were concerned about the emissions from buses, especially on the High Street and from stationary buses. There were mixed views on the Park and Ride network. Some respondents suggested that the buses are often empty and the services should be cut. Others asked for more Park and Ride sites. Further bus priority measures were requested, as was a new orbital bus route. One respondent asked that Exeter City Council reinstate school buses.

Rail, Metro and Tram Networks

There was support for the Devon Metro scheme, various forms of tram system, and integrated bus and train networks. Emissions from trains were cited as a concern, which could be resolved by electrification. One respondent asked for a second entrance to St David's station, on the Exwick side of the station. Another respondent suggested greater movement of freight by rail.

Reducing the Need to Travel, Especially in Peak Hours

Respondents suggested that better use of IT, flexible working and home working would reduce traffic flows on the roads, especially during peak times. Respondents also felt that businesses and schools should be supported in promoting green travel. One survey response asked the Council to promote use of local suppliers, to reduce travel miles. There was also a suggestion that deliveries could be scheduled to avoid peak times.

Highways Management

This was an area where the survey respondents made a large number of suggestions. There was support for extended 20mph zones, limiting car access to city centre and through traffic, reduced road space, junctions which prioritise cycling and walking over vehicles, and use of active travel information about queues, congestion and air quality to encourage modal shift and changes in travel habits. Some replies recommended quantified targets for traffic reduction.

Other suggestions focussed on improving the efficiency of the road network. These included: fewer traffic lights, better traffic light management, bridges and underpasses to replace traffic lights, extended residents parking, and more parking enforcement. Major schemes such as another Exe crossing and new or widened arterial routes were also mentioned. There was a suggestion to use radial routes as one way flows during peak hours. Investment in road maintenance was also recommended.

Many responses referred to changes that could be made at specific locations, and the need to understand the micro causes of congestion (for example at Exe Bridges, the First and Last junction, Bridge Road and Countess Wear, London Inn Square, Alphington Cross, York Road, and the Red Cow railway crossing).

One respondent stated that blocking short cuts through housing estates causes congestion on main routes.

Cycling and walking

Cycling and walking was an area with many suggestions to promote modal shift including a monthly car-free day to encourage use of active travel, better changing and showering facilities for cyclists in the city centre and employment areas, and a 'green bike' project in the city. People completing the

survey also wanted the roads to be made safer for cyclists. Pedestrian-only areas such as the High Street were suggested, and for example making the Iron Bridge a green bridge.

Many replies asked for an extended, better planned, better lit, and better maintained cycle network; but there was some disagreement as to how best to achieve this. There are supporters of off-road cycle paths, and those who want cyclists and pedestrians to be kept apart. Some suggestions were for more underpasses and bridges, whilst others wanted the environment to be made more green and pleasant (rather than concrete) to attract cyclists and walkers.

Car Parking and Demand Management

Responses included support for reduced city centre parking, increased parking charges, a congestion charge and workplace carpark charging. There was a request for car park income to be spent on public transport.

New Housing Development

A variety of suggestions were made, including less development, less edge of town housing development (build on car parks in the city instead), car free new developments and a requirement for public transport provision to be in place before the first house is occupied. One reply asked for new development to have off-street parking to improve traffic flows.

There was also a recommendation that development should be prevented where existing pollution levels are high.

Low Emission Vehicles

A number of replies said that car ownership will remain, and the Council should work instead to reduce emissions. A variety of measures were suggested including a Low Emissions Zone in the city centre, greater enforcement of car emissions, measures to reduce idling vehicles, promotion of electric vehicles, and more charging facilities. There was also support for low emission goods and public service vehicles.

There was a suggestion that local providers of low emission technologies should be used where possible.

Trees

Survey respondents asked for more trees, and protected green space.

Awareness Raising and Health Data

Respondents suggested that the Council increase knowledge and understanding of the effects of air pollution, including research into local health effects, and engagement with local health professionals. Some respondents felt that better public understanding would lead to behavioural change. The Council should stress the other health benefits of active travel modes as well, such as improved fitness and mental wellbeing.

Air pollution data was also requested for the High Street, M5 corridor and Topsham. One reply asked for an independent assessment of air quality in the city.

Industrial Emissions and other Emissions

Some of those responding to the survey asked the Council to consider other sources of emissions. These were the *Energy from Waste* (EfW) plant on Marsh Barton, and the airport. One respondent suggested greater use of solar panels.

Access

One reply asked the Council to consider and consult wheelchair users and those with other impairments e.g. poor eyesight.

Exeter City Council

There was some support for action by the City Council to reduce its own emissions, and to show leadership. One respondent mentioned reduced taxi emissions.

Climate Change

One reply asked the Council to consider the effect of future climate change on policies. Another person did not want the Council to use resources on countering climate change.

“Air quality is not important”

Not all the comments provided through the open text were supportive. Some suggested that the LES should not be a priority for the Council, and the council should not remove people’s right to make free travel choices.

3. Development of the strategy following the initial survey

The table below provides a list of suggested measures from the survey questions in the first column. The second column contains details of where initiatives have been included in the LES, or reasons why they have not been included.

Suggested Measure	What has been included in Strategy
Encourage bus operators to make improvements to their fleet and reduce emissions (69% support)	Support bus operators in taking action, including alternative fuels
Promote more sustainable travel choices (e.g. walk, bike, bus, car share, train, park & ride) (65% support)	Promote the Devon Metro, and investigate Park and Ride by train from rural stations. Personalised travel planning where funding available. Further improvements to walking and cycling network, including in the city centre. Consider opportunities for changes to parking policies to manage demand, encourage alternative travel choices and low emission vehicles
To work with the highway authority (Devon County Council) to improve the efficiency of main road routes (61% support)	Improve flow efficiency, investigate pinch points, and further bus priority measures
Encourage the use of cycling infrastructure (e.g. cycle lanes, parking, etc) (60% support)	Improvements to cycling network especially in the city centre
Design new housing and office developments that promote low emission transport (57% support)	Devon County Council to provide travel planning service for developers Improved engagement with Local Enterprise Partnership on air quality, as well as between relevant officers at DCC, ECC and neighbouring authorities

Suggested Measure	What has been included in Strategy
Help businesses to promote sustainable travel options to their employees (52% support)	Park and Change, and travel planning with local businesses
Raise awareness of effects of poor air quality and the benefits of taking action in and around Exeter (46% support)	Study into personal exposure to air pollution
Work with affected communities to find ways to reduce their exposure to poor air quality (45% support)	Personal exposure study outputs to be used to produce educational material
Reduce emissions from Council vehicles (42% support)	Measure included to reduce emissions
Refresh the Council green travel plan (40% support)	Measure included to reduce emissions from Council vehicles and travel by Council employees
Assist businesses to benefit from more efficient delivery of goods and servicing (40% support)	Reintroduce Freight Quality Partnership
Encourage taxi and private hire operators to use more electric and low emission vehicles	Investigate options for both hackney cabs and private hire vehicles.
Enhance the Council's Green Accord which sets out the environmental standards we expect of our suppliers (36% support)	No specific actions included
Assist organisations in Exeter to apply for Government grants to help fund low emission vehicles (29% support)	Measure included to provide information and promote uptake of Low Emission Vehicles

The free text suggestions were discussed by the project team, and where possible were included in measures in the draft strategy. However some were not directly relevant to this strategy, or are covered by other existing Exeter City or Devon County Council activities. Some helpful suggestions could not be taken forward by the current strategy for various other reasons. Some of these issues are explained below:

Suggested Measure	What has been included in Strategy
Reinstate school buses.	School buses still operate in Exeter
Development should be prevented where existing pollution levels are high	Air quality assessments for new development already assess pollution levels that future residents will be exposed to
Greater use of solar panels. Consider other sources of emissions (EfW plant on Marsh Barton, and the airport). Emissions from trains could be reduced by electrification	These are important issues, but this strategy only covers emissions from road traffic
Consider the effect of future climate change on policies	This strategy looks at all emissions from local transport, including emissions of carbon. Climate Change adaptation is included in separate policies
Air pollution data was requested for the High Street, M5 corridor and Topsham. An independent assessment of air quality in the city is required	Data from all these locations is available from the City Council. The City Council's annual air quality reports are audited by external

Suggested Measure	What has been included in Strategy
	consultants employed by DEFRA (Department for Environment Food & Rural Affairs)
Investment in road maintenance. Enforcing extended 20mph zones.	These are under the control of separate Devon County Council policies
Subsidised bus fares (especially for children and families who do not own a car, or who regularly choose alternative transport modes).	The introduction of subsidised fares for specific groups was considered, but no budget is currently available to fund it.
A tram system which could run on (or under) the existing roads. Bridges and underpasses to replace traffic lights. Major schemes such as another Exe crossing and new or widened arterial routes. Use radial routes as one way flows during peak hours. A 'green bike' project in the city.	These would all be expensive, and no budget is currently available to introduce them.
Blocking short cuts through housing estates causes congestion on main routes.	This would be contradictory to road safety policies.
Bus engines to be switched off when buses are stationary	The introduction of low emission buses should reduce this problem.
A second entrance to St Davids, on the Exwick side	This is not currently possible because it would mean crossing an active Network Rail site.
Greater movement of freight by rail. Electric cars to make a noise so pedestrians can hear them coming. Greater enforcement of car emissions.	This requires action at a national level, rather than by the City Council.
A new orbital bus route.	This is not currently included in the Bus Growth Strategy, and so it has not been included in the LES because there is currently no funding available for it. This situation will be kept under review.
Quantified targets for traffic reduction.	One of the measures for success of the strategy will be traffic flow levels.
Monthly car-free day to encourage use of active travel	The strategy includes a range of other options to encourage active travel which are thought to be equally effective.
Less development, especially edge of town housing development (build on carparks in the city instead). New development should be car free. Public transport provision should be in place before the first house is occupied. New development to have off-street parking to improve traffic flows. Plant more trees, and to maintain the green space around the city.	Development policy is set by the Local Development Framework. Existing Supplementary Planning Document on sustainable transport is in place, we now wish to strengthen it via the Strategy.
Promote use of local suppliers, to reduce travel miles. Local providers of low emission technologies should be used where possible	The existing ECC Green Accord gives support to use of sustainable suppliers.
Measures to reduce idling vehicles	Monitoring locations will be reviewed to see whether pollution any hotspots caused by vehicle idling could exist. If evidence suggests

Suggested Measure	What has been included in Strategy
	that this could be a problem, then action will be taken as appropriate.

4. Consultation on Draft Strategy

A further consultation was conducted on the draft strategy between December 2014 and January 2015. Two replies were received and the main points raised and responses are outlined in the table below.

Issue Raised/ Suggested Measure	What has been included in Strategy
The 'strategic aims' don't include actually reducing emissions (other than in the Council fleet). This seems a bit of an omission.	Exeter City Council have focused on reducing emissions from their own fleet, as this is within the Council's control. The Council are working with Devon County Council to identify several schemes that will improve traffic flow to reduce emissions. In addition the reintroduction of the Freight quality partnership provides the Council with the freight industry to identify means of reducing emissions from Heavy Goods vehicles.
I'd still like to see more ambition in this strategy. A strategy should have a long-term view of where we want to be. As such, I'd have liked to see in the strategy a long-term vision that articulates what will be different in the city in, say five or ten years' time.	The LES is the first stage in delivering schemes that will assist with improving air quality. The LES has been deliberately focused on three years to ensure the document remains relevant and that the measures are achievable.
It's this sort of strategic vision and ambition that the draft strategy still lacks. I'd encourage you to think these long-term and visionary thoughts. The strategy is the place where these things should be articulated.	The Council's vision has been added to the document.
Will this strategic initiative be something that is quantified? I'm very keen that this strategy is quantified so that it can be measured how we are succeeding in delivering this strategy? This is crucial.	The monitoring plan Appendix 3 includes what will be measured at each stage of the LES. Exeter City Council will continue to monitor air quality in the city.
The strategic aims need to be more specific in relation to targets so that the scale of the task and the priorities are clear e.g. <i>To improve Exeter's air quality by tackling pollution in particular reducing NO₂ levels from xxx to xxx by date.</i>	The main body of the document has been written so that it is accessible, highlighting the benefits of delivering the measures. Appendix 2 contains the detailed work in this area.

Issue Raised/ Suggested Measure	What has been included in Strategy
<p><i>To ensure emissions meet the legally binding limits for concentrations of major pollutants as set out in the 2008 Ambient Air Quality Directive (2008/50/EC) (based on WHO recommendations to minimise acute effects of air pollution).</i></p>	<p>A specific aim and target has not been set as many of the changes required sit outside of Exeter City Council’s control. The LES is therefore designed to provide information on the type of schemes the council will be actively pursuing to reduce emissions.</p>
<p>In light of the Parliamentary Committee’s report I would suggest that special measures are investigated with DCC for addressing pollution generated near to schools in particular those next to a busy road e.g. St Sidwells.</p>	<p>The LES contains several initiatives that will reduce emissions near schools in the city.</p>
<p>You mention monitoring success, and I would suggest that an indicator for each action would be helpful e.g. reducing pollution/NO2 related deaths from x to x pa.</p>	<p>It can be very difficult to attribute deaths to air quality at the local level. This is why this type of indicator has not been included.</p>
<p>It is unclear whether Defra intends to scrap the duty on local authorities to review the need for continued assessment and reporting on objectives that have been met e.g. PM10 – therefore I would suggest that a commitment is specifically made in the strategy to maintaining monitoring stations in addition to any further assessments that are planned. https://consult.defra.gov.uk/communications/laqm-review-next-steps/</p>	<p>Exeter intend to continue monitoring air pollutants across the city.</p>
<p>With regard to sustainable travel plans – developing personal plans is an insufficient measure. Early work needs to include stagecoach and train providers and work with DCC to improve the coverage and cost of public transport options. There is a real opportunity now- before further major developments are implemented to address the infrastructure issues which make travelling by public transport the norm rather than the exception.</p>	<p>Devon County Council are providing travel planning support to developers to ensure that the initiatives delivered help to reduce single occupancy car trips within Exeter.</p>
<p>There needs to an overall specific target in relation to the reduction of journeys by car in order to make a difference to pollution levels, otherwise for example any increase in P&R (which is already very reliable and subsidised at the expense of local journeys) will be negated as people will just sit in jams. The commitment to support the Devon Metro is welcome and investment I in this is welcome above increased P&R services (especially and Ide) of which the business and environmental case has not been adequately demonstrated by DCC & ECC.</p>	<p>Exeter City Council is exploring several options including Park and Ride and Devon Metro as not all solutions are practical for people wishing to visit or working and living in the city.</p>

Issue Raised/ Suggested Measure	What has been included in Strategy
<p>“Raise awareness of the effects of poor air quality and the benefits of taking action in and around Exeter” a study needs to be undertaken of the impact of pollution on public health of key emitters, not just transport.</p>	<p>The LES is focused on transport only at this time as this is the largest single emitter of NO₂ and PM.</p>
<p>Electric charging of vehicles: I understand that the Council’s charging point is used as a regular car park during the day. A friend who tried to charge a car that he had on hire was unable to do so because of this – could you let me know if this was a one off or is Council policy?</p>	<p>There are two charging points at the Civic Centre which are available for use by the public when they are not being used by the Council’s electric pool vehicles. Other charging points are available in city centre car parks. Please see http://www.exeter.gov.uk/index.aspx?articleid=15232#Charging points for further information</p>