

**From: Reading Friends of the Earth**

**Comments on RBC Air Quality Action Plan Update - January 11<sup>th</sup> 2016**

We welcome Reading Borough Council's intentions to update its Air Quality Action Plan and to improve air quality across Reading.

The Council's draft document does not give us confidence that air quality in Reading will be satisfactory any time soon. We hope that the Council has additional analysis and reports which address our concerns, in which case it would have been helpful if there had been links to them.

***The Council's draft document does not:***

- Report on progress against the actions and targets in the 2009 Air Quality Action Plan – so provides no evidence as to whether previous actions have been successful and should be continued.
- Describe what the criteria for success will be – will this be measured levels of pollutants, modelled concentrations at receptors, or an improvement in public health?
- Quantify current levels of air quality in Reading against Objectives to show how important it may be to make improvements – and how much (and where) things must change to achieve acceptable results.
- Project future levels of air quality based on expected changes in traffic volumes, composition of vehicle fleet, and effectiveness of emissions controls.
- Quantify changes in air quality expected to result from any of the proposed actions – which might allow for some cost-benefit analysis and an assessment of whether the actions would lead to success

***New Government Plan***

The update should be reviewed to ensure compliance with the government's new plan (17<sup>th</sup> December 2015) which is available via this link:

<https://www.gov.uk/government/news/improving-air-quality-in-cities>

However compliance with this will not be sufficient because the government document does not address pollution from particulates. Also it does not propose actions to address pollution from private cars, when the Council's document says tackling diesel cars is likely to be most effective in reduction of NO<sub>2</sub>.

***Discussion of proposed actions:***

The updated document's actions are a list of ideas, many of them probably useful, but with no assessment framework and no predicted outcomes.

- What assumptions are made about future volumes of traffic and of different types of vehicles in use?

- What assumptions are made about effectiveness of emissions controls on diesel vehicles in the light of the VW scandal given that the Department for Transport (DfT) states that the car fleet will continue to increase its dieselisation [para 3.58, page 53, RTF 2015]?
- It is not clear whether actions to reduce congestion or to increase use of alternative modes of transport - measures such as MRT, rail up-grades, P&R etc. - will actually bring significant reductions in traffic volumes and improve air quality or merely allow more people to gain access by less-polluting modes while traffic volumes are largely unaltered. Reading's Local Transport Plan 3 predicted an increase in demand for travel of 15% by 2026.
- It may be that demand for travel within Reading is such that any reduction in congestion by the proposed actions will be short-lived with more people choosing to travel – filling up any space created on the roads or in the car-parks.
- Page 6 of the Council's draft says Local Policy DM 19 should not allow development that makes air quality worse – does that mean no more car parks in central Reading?

END.