



12 January 2024

Aberdeen City Council

Transport Strategy

By email: [transportstrategy@aberdeencity.gov.uk](mailto:transportstrategy@aberdeencity.gov.uk) [alansimpson@aberdeencity.gov.uk](mailto:alansimpson@aberdeencity.gov.uk)

**Dear Sirs,**

**Draft Local Transport Strategy (2023-30)**

Thank you for the opportunity to comment on the draft LTS 2023 - 2030. ACF is an established cycle campaign and advocacy group established in 2003. Although we cannot claim to represent all cyclists, we have approximately 600 members. Our aims, as set out in our constitution, are noted at the foot of the page.<sup>1</sup>

**General**

We support the majority of measures set out in the draft LTS and the desire to modernise transport in Aberdeen so that the current imbalance in favour of private car use is addressed. Inevitably this will mean some change of priorities and re-allocation of road space. Such measures are unlikely to be universally popular and they will require a high degree of political support and commitment to see them through. We have in the past been frustrated by the slow pace of change and we expect this will continue to be a challenge in the face of urgent need, including climate change, poor air quality and the public health crisis. *Delivery* of the strategy over the next number of years is therefore critical to the wellbeing and future prosperity of Aberdeen and its residents. We hope that in due course this LTS will support Aberdeen in being able to better access national funding for active travel, rather than missing out as seems to have happened on several occasions in the past.

---

<sup>1</sup> A) To encourage cycling and to promote the benefits of cycling to the individual and the wider community B) To advocate for a safer cycling environment and improved cycle facilities in Aberdeen. C) To campaign for cycling to be an integral part of planning and transport strategies and practice, in order to provide the widest possible access to cycling as a healthy and efficient means of travel for work and leisure.

**Strategic context** – we note that the graphic at Figure 6 puts a positive spin on some developments in the realm of cycling but it would also be more honest to somehow depict that there has been no significant and sustained increase in cycling as a modal share over this period. Figures 8, 9 & 10 seem to present mixed messages which the text goes some way to explaining. It correctly concludes that the sharp rise in cycling during the pandemic highlights the latent demand, but also that the rise in numbers has not been sustained which we would attribute to a lack of high quality infrastructure. The various Figures (8 -11) depict the changes in travel modes against various baselines but there is no clear statement as to what modal share for cycling actually is.

**Strategic context – challenges.** We would also include the recent trend towards larger and heavier vehicles, (SUVs, pick-up trucks etc) the increasing numbers of these vehicles on city streets and the increased impacts from noise, emissions, reduced space for other road users and pedestrians, and negative impacts on road safety. Some other cities (such as Edinburgh) are now debating as to whether such vehicles need to be somehow restricted and we would like to see an Action to examine this for Aberdeen.

**Opportunities** – we would like to see mention of the economic and tourism potential from an improved cycle offer. Aberdeen City and Shire has the potential for much greater benefits from cycle-related tourism, if properly encouraged.

### **Section 3 – overarching strategy**

Outcomes (up to 2030 and beyond) [p27] – we note that there is a specific longer-term outcome “A” to increase journeys made by active travel ... but no equivalent short-term outcome, which would seem to be an obvious omission.

### **Section 4 – spatial narrative**

Cycle routes (even NCN routes) are omitted here except where they form part of multi-modal corridors.

### **Section 5 – topic areas.**

**Topic 1** - In Figure 16, increasing walking and wheeling is listed as a key outcome, but cycling is not mentioned. Elsewhere in the document wheeling is defined as not to include cycling – therefore cycling should be listed separately. Again in Figure 16, Under strategic objectives, we disagree that to “reduce the demand for travel” is correct and we would suggest adding “except by sustainable means”. The same applies to the first ‘Action’ listed in the table on p36.

**Topic 2 – air quality.** We note the recognition that the LEZ by itself will not solve all of Aberdeen’s air quality issues, and by implication that the relatively small extent of the LEZ risks simply displacing the problem, rather than solving it. Under the actions in Policy 2 – air quality, we would suggest adding “continue to promote modal change towards more sustainable forms of transport”. We are not sure that the statement to the effect that people choosing active travel are ‘less protected’ from air pollution is correct. There is evidence that those in cars are just as badly affected. We suggest the wording is amended, or a citation given to justify it.

**Topic 3 – noise quality.** We would agree that Aberdeen has localised streets where noise from traffic is very detrimental to wellbeing and quality of environment. Some of these are high profile locations such as Anderson Drive, the Beach Boulevard and indeed the City Centre. There are a number of factors,

including speed and volume of traffic but also anti-social driver behaviour and (probably) illegally-modified vehicles. There does not appear to be any effective enforcement of *speed* or *vehicle noise*. The Actions listed under Policy 3 do not adequately explain how these issues will be addressed.

**Topic 4 – reducing the need to travel.** We think this is too simplistic and does not recognise the beneficial role that active travel can have. We think it is hard to reconcile reducing the need to travel with an economically active and vibrant city centre. Travel should not be discouraged where it is sustainable, which this topic area and Policy 4 does not adequately acknowledge. We don't think the text on p40 & p41 adequately makes the connection with the fact that active travel is beneficial to health. We support the principles of local living and 20 minute neighbourhoods.

**Topic 5 – walking & wheeling.** We support the actions listed under Policy 5, although it is not clear to what extent this represents any change to the status quo. Our experience is that on a number of levels, vehicular traffic is still prioritised over the needs of pedestrians. For examples we would cite the inadequate crossing points at both ends of the Queen Elizabeth bridge, similarly the George VI bridge, crossing points (lack of) on Anderson Drive, and finally the very poor and hazardous pedestrian provision on Bridge of Dee. These are all problems that have existed for many years and have yet to be addressed in any meaningful way.

**Topic 6 – cycling.** The long list of Actions under Policy 6 gives an indication of how far Aberdeen is currently from being a cycle-friendly city. We mostly agree with the narrative and list of actions, but have the following further comments;

- Again, the narrative is lacking a clear statement of what the modal share for cycling currently is.
- CTC Grampian should be recognised as one of the bodies encouraging people to cycle, through their regular programme of 'Try Cycling' rides.
- Although we were pleased to see the Tour of Britain visit Aberdeen, we have not seen any evidence that such events actually create a beneficial legacy. If another such event were to be hosted we would like to see it be more inclusive.
- The narrative states that there is a significant gender gap in cycling, but there are no Actions to specifically address this.
- The 2<sup>nd</sup> action listed encompasses many measures which we support but a step-change is needed in terms of their roll-out.
- The 5<sup>th</sup> Action listed mentions 'trails and challenges'. We aren't sure what this refers to.
- In the past we have sometimes been sceptical about the choice of location for investment in active travel. Craigshaw Drive is a current example. We hope that the *Network Review* currently underway will go some way to providing a much more strategic plan, and evidence of where investment should be targeted. We think there are some very obvious missing connections, such as a high-quality cycle route south from Aberdeen connecting the communities of Cove, Newtonhill, Chapleton, Muchalls and indeed Stonehaven.

**Topic 7 – bus.** We recognise the critical role that public transport plays in providing alternatives to private car journeys, and therefore support measures to promote buses and making the service quicker and more reliable. We are slightly concerned sometimes that bus prioritisation is at the expense of

cyclists. This should not be the case, as the *transport hierarchy* makes clear. Furthermore according to *Cycling by Design*, cyclists should not be expected to share bus lanes. Integration between modes could improve – the ability to carry bikes on buses (especially rural services) and the provision of cycle parking at the bus station.

**Topic 8 – ART.** Our main comment on ART routes are as above under Topic 7. We hope that ART services will allow cycles to be carried on board, as an important means of integrating and cross over between modes.

**Topic 10 - rail** – Again our observation is that there is poor integration between the modes of train and cycling currently. Taking a bike on the train is difficult and unreliable and requires a degree of forward planning which makes it frustrating or impossible. The problem appears to be with the train companies and outdated rolling stock which is probably beyond the scope of the LTS. Although cycle parking at stations is welcome, and has improved in recent years, we don't think it is really a substitute for increased capacity to carry bikes on trains themselves. Although slightly improved recently by the changes on Guild St, access to the railway station by bike (e.g. Market St) is still poor or very poor.

**Topic 16 – powered two-wheelers.** The text here begins to examine the issues and unpick some of the problems although national solutions are probably needed. E-scooters are often viewed as a 'menace' although in reality they are a far more sensible and sustainable mode of city centre transport compared with - for example – a large car or SUV carrying 1 – 2 people. The difficulty is regulation and that e-scooters need to be used on appropriate routes. There is also an issue with electric mopeds or modified e-bikes which are currently masquerading as cycles and creating a number of issues. The law seems to us to be clear but there is currently no effective enforcement (final Action, Policy 16).

**Topic 17 – zero emission vehicles.** We note that the text acknowledges that ZEVs have their benefits but do nothing to reduce congestion. We have casually observed two other aspects of ZEVs. Firstly, the lack of engine noise can be a safety issue for pedestrians and cyclists. Secondly, that automatic transmissions and high-torque electric motors can lead to an increase in acceleration and speed of vehicles, which is undesirable in an urban environment.

**Topic 18 – parking.** One of the greatest impediments to provision of high-quality cycle lanes is the lack of space on our streets, because of the habitual use of that space for on-street parking. We support the Principle expressed in Figure 33, and Action 7 that on-street parking should be reduced. Under Policy 18, action 10 deals with enforcement and we feel that this is currently severely lacking, with impacts on congestion, air quality and road safety particularly that of vulnerable users such as pedestrians and cyclists.

**Topic 19 – demand management.** We support measures to manage demand, as a means of reducing (car) traffic and so improving the environment for more sustainable modes. Under Policy 19 only one - very general – action is listed which suggests a lack of impetus or commitment. We would also like to see actions in this section to address two other aspects of demand. Firstly, there has been a very significant rise in food delivery, both by car and bike and also by electric mopeds. Secondly, the city centre attracts a number of anti-social drivers whose journeys are purpose-less, other than 'parading' which have impacts through noise, congestion, emissions and road safety.

**Topic 20 – road improvements.** We note there is no mention of Wellington Road – we have been waiting for ‘improvement’ (of the active travel provision) for many years, but despite repeated rounds of consultation there has been no visible progress. We disagree with the logic behind the Berryden and South College St schemes, and feel that these only lock in further car dependency.

**Topic 22 – AWPR.** We remain sceptical about the supposed “lock-in” of benefits and hope that these will become more apparent over time. We welcome Action 3 to “*substantially* .... Improve provision for active travel provision”. We continue to be disappointed that the Murcar-Blackdog cycle track, funded by AWPR mitigation, has yet to be delivered.

**Topic 23 – ferries and shipping.** We agree that active travel connections to the ferry terminal and also South Harbour are currently poor or very poor, and welcome Actions 1 & 3 under Policy 23.

**Topic 27 – land use planning.** Our impression in the past is that Aberdeen has been reluctant and slow to even consider – let alone implement – new approaches such as local living & 20 minute neighbourhoods. We welcome the inclusion of actions to support this and other novel approaches which challenge car dependency.

**Topic 28 – travel plans.** We support the use of travel plans although we are unconvinced that they are always effective, that they are monitored after implementation, or in any way enforced or enforceable.

**Topic 29 – City Centre and beach.** We support the current impetus towards making these destinations better linked and with increased prioritisation for active travel. However we are disappointed that the 2015 City Centre Masterplan has not yet delivered many tangible benefits for cycling.

**Topic 31 – road safety and traffic management.** We note the acknowledgement that pedestrians and cyclists are disproportionately at risk and that reduced speed limits and other traffic management measures, including the creation of more traffic-free cycle tracks, is an important part of the solution. The photograph of King St on p96 illustrates the lack of appeal of a narrow, on-road advisory cycle lane on a street with very high volumes of traffic including significant bus and HGV traffic.

**Topic 32 – enforcement.** We agree that enforcement is a key issue, without which many of the proposed measures to manage traffic are ineffective. We have previously noted the lack of driver compliance with pedestrianised areas such as Belmont St, Back Wynd, Loch St. More effective means of enforcement need to be utilised if these measures are to have any real benefit. If the measures cannot be enforced, then they are meaningless. We have previously been told that ANPR cannot be used in all of these circumstances. We would suggest that an Action is added ‘to investigate and implement where possible more effective enforcement of traffic management measures’. Anecdotally, we think parking enforcement, even on main thoroughfares (e.g. King St, George St, Holburn St) is lacking and rogue parking leads to increased hazards for pedestrians and cyclists as well as greater congestion and air pollution. Given that current bus lane and yellow / double yellow restrictions are not being strongly enforced, we question how the new prohibition of pavement parking will be enforced.

**Topic 33 – school travel and young people.** We recognise that car use around schools is sometimes very poor practice and even anti-social. Again there seems to be insufficient enforcement to provide a deterrent. Unnecessary engine idling around schools is also an issue on which we have campaigned in the past – again there seems to be no enforcement and as we understand it, Community Wardens do not currently have powers to issue penalty notices. We support the trial of car-free zones around

schools. We would suggest a further action that Community Wardens be given powers to enforce engine idling.

**Topic 34 – new technologies and initiatives.** We would like to see this section address the opportunities – but also problems – presented by e-scooters and types of electric mopeds which are currently in widespread use in the city centre, despite currently being illegal.

**Topic 36 – road, carriageway and footway maintenance.** We would prefer to see higher levels of maintenance on pavements and cycle ways. When cycling on road, cyclists are more at risk and the hazards from potholes etc can lead to injury. The longer term solution to this has to be more segregated cycle tracks where heavy vehicles (which cause the damage) are absent.

**Topic 37 – winter maintenance.** We would like to see a greater proportion of budget being spend on footways and cycle paths. We note that the allocation of budget does not reflect the transport hierarchy. We have recently discussed with officers the prioritisation of routes, although without a substantial increase in budget (which we know is unrealistic) there is no perfect solution. We find it incongruous that Aberdeen's most heavily-used cycle (shared use) route - the Deeside Way, receives no treatment.

**Topic 38 - structures**– we would like to see recognition that some of Aberdeen's structures (road bridges) present significant barriers to active travel. Queen Elizabeth bridge and George VI bridge are examples where east-west connections are severed with no useable crossing points. Bridge of Dee offers very poor provision for pedestrians and cyclists, with no easy alternative. Bridge of Don has no specific cycle provision. We would like to see actions included to examine these problems and identify solutions.

**Other points:**

National Cycle Network – Figure 1 illustrates the tortuous route followed by NCN 1 to the south of Aberdeen. We think there is probably room for improvement both for that section and routing of NCN1 through the city – possibly to route along the beach. We would like to see this properly examined.

We hope you find these comments useful and we would be happy to clarify or discuss further as necessary.

Yours faithfully,

**Gavin Clark**

**Chair – Aberdeen Cycle Forum**