

ABERDEEN LOW EMISSION ZONE

OUTCOMES FROM STATUTORY CONSULTATION ON THE PROPOSED LEZ SCHEME FOR ABERDEEN



SUMMARY TABLE

Client	Aberdeen City Council
Project	Aberdeen Low Emission Zone
Title of Document	Outcomes from Statutory Consultation on the proposed LEZ scheme for Aberdeen
Date	30/09/2021
Reference number	GB01T19I15/200921
Number of pages	24

1. INTRODUCTION

1.1 Statutory Consultation

1.1.1 [Section 11](#) of the Transport (Scotland) Act 2019 states that before a local authority submits its final Low Emission Zone (LEZ) proposals to Scottish Ministers for approval, it must consult with:

- the Scottish Environment Protection Agency
- NatureScot
- Historic Environment Scotland,
- such persons as the authority considers represent the interests of
 - i. the road haulage industry
 - ii. the bus and coach industry
 - iii. the taxi and private hire car industry
 - iv. local businesses
 - v. drivers likely to be affected by the proposal
- such persons as are specified by the Scottish Ministers in regulations
 - i. neighbouring local authorities
 - ii. the Regional Transport Partnership (Nestrans)
 - iii. the local Health Board
- such other persons as the authority considers appropriate

1.1.2 In line with The Act 2019, Aberdeen City Council (ACC) launched an eight-week consultation from 28th June 2021 to 22th August 2021 on its proposed LEZ scheme for the city, as agreed at the [City Growth and Resources Committee](#) on 24th June 2021.

1.1.3 The statutory consultation period consisted of the following elements:

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- Email correspondence to statutory consultees and organisations advising of LEZ proposals
- Stakeholder workshops
- Online survey seeking views on the proposed LEZ option
- Information flyer delivered to residents and businesses in proposed LEZ area

1.1.4 This report summarises the outcomes from the eight-week statutory consultation on ACC’s proposals for its LEZ and will form part of the submission of the LEZ Scheme to Scottish Ministers.

1.1.5 Prior to summarising the statutory consultation, the report will review the previous consultation events undertaken in support of the LEZ in Aberdeen.

2. PREVIOUS CONSULTATION SUPPORTING ABERDEEN’S LEZ

2.1 Public and Stakeholder Consultation

2.1.1 Upon completion of the [Interim NLEF Stage 2 Report](#) (*Aberdeen Low Emission Zone, National Low Emission Framework Interim Stage 2 Report, SYSTRA 2020*) ACC’s City Growth and Resources Committee gave approval to undertake a consultation exercise on eight possible LEZ Options. The consultation took the form of an online public survey and virtual workshops with key (and statutory) stakeholders. The outcomes from the consultation period were reported to the City Growth and Resources Committee in June 2021 and summarised here.

2.1.2 The online public survey ran for six weeks from 14th September 2020 to 25th October 2020 and was administered by ACC. The survey received 506 responses with a further 10 received by email. The survey included questions seeking to discover respondents’ views on LEZs in general and:

- 48.4% of respondents supported the general principle of LEZs
- 40.9% were not in favour of LEZs
- 10.3% were unsure

2.1.3 Specifically asked about the introduction of a LEZ in Aberdeen to address air quality problems in the city, 43.9% of respondents were supportive of a LEZ and 42.6% were not supportive of a LEZ in the city.

2.1.4 Of the eight options presented for consultation in the [Interim NLEF Stage 2 Report](#), Option 4A (22%) received the most preferred option votes overall, followed by Option 1A (19%). As outlined in the NLEF Report, the consultation outcomes and subsequent modelling and appraisal of the eight LEZ options, resulted in a hybrid of Option 1A and 4A (Option 5) being identified as the preferred option to be presented for Statutory Consultation.

2.1.5 A range of virtual workshops with key stakeholders were held concurrently with the live public survey dates during September and October 2020. Five workshops were held in total with the stakeholders represented as follows:

- Bus industry representatives:
 - Stagecoach East Scotland, First Bus, Bains Coaches and the Confederation of Passenger Transport (CPT)

- Local freight industry representatives
- Aberdeen Harbour
- Community Councils:
 - George Street, Rosemount and Mile End, Castlehill and Pittodrie
- Environmental/interest groups
 - Friends of the Earth, Aberdeen Cycle Forum, Asthma UK and British Lung Foundation Partnership, Aberdeen Environment Forum
- Taxi representatives

2.1.6 Further analysis of the results can be found in the second [Interim NLEF Stage 2 Report](#). The consultation results show the level of support for the introduction of a LEZ in Aberdeen and crucially the information received helped shape and inform the final proposed LEZ area (as a hybrid of the two most preferred options) for final Statutory Consultation.

2.2 Focussed Covid-19 Consultation

2.2.1 In response to the Covid-19 pandemic the national LEZ Leadership Group announced in May 2020 a temporary pause in plans to implement LEZs across Scotland. Plans were formally resumed in August 2020 and a new indicative timescale for the introduction of LEZs was published, that aims to see their introduction between February and May 2022.

2.2.2 In light of the difficulties faced by many throughout 2020 and 2021, ACC were keen to understand the level of support for the introduction of a LEZ in the city post pandemic and gauge the impact the pandemic may have had on businesses and bus operators in preparing for its introduction.

2.2.3 ACC have consulted with bus operators in the city regularly throughout the LEZ process and have kept them up to date with ongoing proposals for the city's LEZ. Given the importance of bus compliance to the success of any LEZ, the operators (First Bus, Stagecoach and Bains Coaches) were approached in March 2021 and asked to complete a short questionnaire on the impact of Covid-19 on investment plans and likely future fleet compliance.

2.2.4 The business community has also been significantly impacted by the Covid-19 pandemic, with many shops and services required to close or provide reduced service due to Government restrictions. No business representatives attended the autumn 2020 workshops, and given the importance the business community to the implementation of any LEZ in the city, a further business workshop was organised for April 2021 where representatives from Union Square shopping centre and Aberdeen & Grampian Chamber of Commerce attended.

2.2.5 A key outcome from the focused consultation was to inform the length of the grace period. It was recognised that the Covid-19 pandemic has had an unprecedented impact on society, including on the wider environment and the economy. Cognisance of the difficulties faced by many throughout 2020 and 2021, particularly in the context of a Aberdeen city centre LEZ and its implications for city businesses and bus operators, suggested that a grace period greater than the required minimum one year was needed and a two year grace period was subsequently proposed.

2.3 Key outcomes from previous consultation

2.3.1 The preferred LEZ scheme for Aberdeen has been shaped by ongoing consultation with key stakeholders and members of the public in Aberdeen and surrounding areas. Key outcomes from the consultation undertaken prior to the Statutory Consultation are:

- Strong support for the introduction of a LEZ in Aberdeen
- The final preferred option informed by views on the original set of eight options for consultation
- The grace period is required to be greater than the one year minimum, with a two year grace period proposed

3. SUMMARY OF STATUTORY CONSULTEE RESPONSES

3.1 Introduction

3.1.1 To seek views from the statutory stakeholders and key organisations, businesses and interest groups, consultation on the preferred LEZ option, as agreed by the City Growth and Resources Committee in June 2021, consisted of the following elements:

- Email correspondence to statutory consultees and organisations
- Stakeholder workshops on LEZ proposals with question and answer sessions

3.2 Written Submissions from Stakeholders

3.2.1 Table 3.1 shows stakeholders and organisations contacted directly by ACC that provided a written submission in response to the proposals for Aberdeen’s LEZ.

Table 3.1 : Written submission received by ACC

Stakeholder Type	Organisation
Bus & Coach Operators	First Aberdeen
	Whyte's Coaches
	Stagecoach
Regional Partners	Aberdeenshire Council
	Nestrans
National Bodies	Nature Scot
	Historic Environment Scotland
Business Community	Aberdeen and Grampian Chamber of Commerce
	Federation of Small Businesses (FBS)
Community Councils	Rosemount and Mile End Community Council
	City Centre Community Council
	Culter Community Council
Harbour	Aberdeen Harbour Board
Education	Robert Gordon College
Shopping Centres and Car Park Operators	Q-Park
	Trinity Centre
	Union Square
Active Travel Groups	Aberdeen Cycle Forum
	Sustrans
	Paths for All
Environment and Interest Groups	Aberdeen Civic Society
	Aberdeen Friends of the Earth
Health Bodies	British Heart Association
	Asthma UK & British Lung Foundation Scotland
Motoring Groups	RAC Motoring Services
Delivery/Logistics	Royal Mail
	UPS
Freight and Hauliers	Road Haulage Association (RHA)
	Peterson SBS Ltd.
	Groundwater Lift Trucks Ltd.
	Shore Porters
	Dyce Carriers
	ARR Craib
	Canadian Natural Resources

3.2.2 In addition to the responses noted above, ACC also received written responses from the following organisations:

- Little Dreams Nursery
- Albyn Garage
- Bridge bar
- Kirkgate Bar
- Scullion, Bruce and Co.
- Unite the Union Scotland

3.2.3 Several businesses and organisations used the online consultation to submit their views on the LEZ proposals as detailed in Chapter 4.

3.2.4 Each response received by ACC was assessed and the key themes and comments collated, as summarised below:

- The main bus operators are generally supportive of an LEZ and state their commitment to playing a part in improving air quality. However both main operators expressed some concerns with the proposed LEZ scheme:
 - Impact of congestion on the immediate boundaries of the LEZ and the ability to operate services with their registered timetable. There is some current experience of this with Spaces for People measures creating additional idling time (as recorded via on-board analysis)
 - All modelling evidence should be released and air quality modelling must be complete to allow all stakeholders the opportunity to respond with all the available information
 - The decision to have city centre car parks outside of the boundary lacks ambition, fails to promote modal-shift and may increase the cost of bus operation
 - The LEZ cannot be introduced in isolation and should be considered with City Centre Masterplan proposals and other major projects. Full details of the proposals for Union Street (i.e. bus only or full pedestrianisation) must be known before considering the full impact of the LEZ
 - Without bus priority measures, buses should be afforded additional grace to comply
 - Enforcement of the LEZ may result in a reallocation of existing fleets across respective operating areas in order to ensure the least polluting vehicles are focused on services which enter the LEZ. This may have a detrimental impact on communities served outside the LEZ, such as Aberdeenshire and Moray. It may also increase inequality in these communities, particularly if local air quality worsens as a result of fleet movements
- Several stakeholders encourage ACC not to implement the LEZ in isolation but alongside measures to promote and increase active travel and a shift to sustainable modes, such as improved cycle and walking infrastructure. The use and uptake of electric vehicles should be further promoted and provisions increased. Further park and ride options should also be explored for all areas serving Aberdeen
- Environmental groups and health bodies are generally supportive of the proposed zone (and LEZs in general) that aims to improve air quality and reduce traffic associated emissions, however a number of concerns were expressed:
 - The zone is not ambitious enough and fails to tackle all LEZ objectives
 - The two-year grace period is too long and it should be as short as possible. The delay (from Covid-19) in LEZ implementation should mean a grace period is not required/should be minimal

- The business community representatives are generally understanding of the requirement for a LEZ but express concerns about the combined impact with Covid-19 recovery. It is important that clear communication to businesses and individuals is continually provided to ensure awareness and support of the LEZ
- A specific objection was received around the proposed southern boundary and the inclusion of the Trinity Shopping Centre. Representation was received that the Trinity Centre is the only shopping centre included in the proposals (with others scoped out). This is considered anti-competitive and economically damaging for the Trinity Centre
- Several stakeholders and organisations, particularly freight operators, expressed concern over access to Aberdeen Harbour, particularly from the north of Aberdeen but also for the movement of good between the southern and northern harbour areas. Particular points noted were:
 - Interruption of logistics around the Harbour
 - Impact of congestion on surrounding residential areas due to vehicles finding the shortest routes and creating rat-runs
 - Longer journeys causing additional costs being forced onto the customers
 - May lead to loss of competition and business
 - Aberdeen does not have the infrastructure or road network to provide a suitable alternative route to the Harbour for non-compliant vehicles with diversion routes through residential and unsuitable roads.
 - A revised LEZ boundary should exclude all or at least some of the Eastern Corridor (East North Street, Commerce Street, Virginia Street, Market Street)
- Concern that many recovery vehicles used in the city are from small businesses with specialist fleets. Such firms may not be able to upgrade their fleets to compliant vehicles which may lead to congestions from a delay in getting compliant recovery vehicles to an incident
- Several stakeholders expressed a desire for all modelling data and analysis be made available in order to fully assess the assumptions and impacts of the proposed LEZ

3.3 Stakeholder Workshops

3.3.1 SYSTRA organised five virtual stakeholder workshops in August 2021 during ACC's 8-week statutory consultation period on its LEZ proposals, held using Microsoft Teams. A summary of the workshop groups and number of attendees is provided in Table 3.2.

Table 3.2 : Aberdeen LEZ Stakeholder Workshops 2021

Workshop Group	Date	Number of Attendees
Community Councils	08/07/2021	8
Environmental, Health & Equalities Groups	26/07/2021	4
Freight & Aberdeen Harbour	27/07/2021	13
Business Community	28/07/2021	12
Bus & Coach Operators	28/07/2021	6
Total No. of Stakeholders Consulted:		43

3.3.2 Each workshop was scheduled for 1 hour 30 minutes. At all workshops, SYSTRA gave a 25-minute presentation on the proposals for the LEZ in Aberdeen, including details on planned operation and enforcement timeline for its introduction, followed by a question and answer session.

3.3.3 It should be noted that the 8-week statutory consultation period did not cover the quarterly Taxi and Private Hire Consultation Group meetings and discussions with ACC officers concluded consultation with taxi operators would be undertaken by email correspondence.

Community Council Meeting

3.3.4 A joint session was organised and was attended by eight representatives from George Street, Rosemount & Mile-end, Castlehill & Pittodrie and Queen's Cross & Harlaw Community Councils.

3.3.5 After the initial SYSTRA presentation, there were a number of queries and comments, as summarised below.

- The general response from a number of attendees was not supportive of the LEZ, suggesting it should be paused with current uncertainties following the Covid-19 pandemic
- To what extent does the emissions and traffic modelling account for changes to the movement of people as a result of the Covid-19 pandemic (e.g. increased home working)?
- To what extent does the emissions and traffic modelling account for changes in vehicles fleets by 2024 and the uncertain forecasts caused by the Covid-19 pandemic?
- Has the AWPR alleviated the problems caused by HGV routing through the city?
- It was noted there are a number of schools (and other sensitive areas) surrounding the proposed LEZ areas. There has to be certainty that introducing a LEZ doesn't move the problems elsewhere, particularly past these sensitive areas. Some questions were raised about the specific traffic flow outputs past such areas from the traffic modelling.

- With current Space for People measures on Union Street similar to proposals for the supporting measures on the LEZ, will congestion (anecdotally) witnessed at locations such as Skene Street or Hutcheon Street not simply occur with the LEZ in place?
- Will the current emission standards be updated and result in the vehicles requirements to continually change (i.e. “moving the goalposts”)?

Environmental, Health and Equalities Groups

3.3.6 There were 4 attendees at this session from Friends of the Earth, Aberdeen Cycle Forum and Grampian Health & Transport Action Plan team

3.3.7 After the presentation, the meeting was opened to questions and comments, as summarised below.

- All representatives were supportive of a LEZ in Aberdeen, to be delivered alongside the wider strategies for ACC (e.g. walking, cycling, pedestrianisation and CCMP proposals)
- Concern the council is progressing with schemes to increase/improve access for vehicles to the city (e.g. the Berryden corridor improvements) only to then try and restrict vehicles from entering the city centre through the LEZ? Is there a lack of joined up thinking?
- What further modelling is being undertaken, is this the same as other cities?
- Anecdotally, there has been an increase in second hand car purchases during the Covid-19 pandemic. To what extent does the emissions and traffic modelling account for changes the pandemic impacting on changes to vehicle purchasing behaviour and to the movement of people as a result of the Covid-19 pandemic (e.g. increased home working)?
- Which groups of people will most likely be affected by the introduction of the LEZ (city centre residents, low income families, businesses?)?
- Has any modelling of the health impacts of the LEZ against a scenario without the LEZ been undertaken?
- What other engagement has happened to date and are there plans for further engagement?

Aberdeen Harbour, freight operators and freight representatives

3.3.8 The session was attended by Aberdeen Harbour representatives, a representative from Logistics UK (previously FTA) and eight operators along with representatives from Aberdeen City and Aberdeenshire Councils. The key comments from the session were:

- The timeline for HGVs (heavy goods vehicles) is considered fair, and allows for a natural fleet change to Euro VI by 2024, meaning very few non-compliant HGVs will be on the network. It was noted that the maximum age of HGVs on the road is (generally) 7/8 years old. After this time, vehicles become too expensive to maintain and operate
- The retrofit funding for HGVs is not viable and does not work on articulated vehicles
- There is no viable route to the Aberdeen Harbour from the north of Aberdeen for non-compliant vehicles. While the LEZ should be a catalyst for change, it should be recognised that the alternative route for non-compliant vehicles is through residential areas with traffic restrictions

- While the majority of HGVs will likely be compliant by 2024, there is likely to be a significant number of LGVs (light goods vehicles) in 2024. This will present problems for access, particularly to the harbour from the north as noted above
- LGVs play a significant part in the supply chain and if they are impacted significantly by the LEZ, this will be felt throughout all freight operations.
- In addition to access from the north to the harbour area, non-compliant vehicles will not be able to move between the north and south harbour areas without routeing around the full LEZ area, adding several miles to their journey
- There was a recognition that the LEZ is coming and operators will have to be ready for it but the unique location of the harbour area and its part in Aberdeen’s economy should also be recognised

Business Community

3.3.9 The session was attended by representatives from the business community in Aberdeen including individual businesses, shopping centres, The Federation of Small Businesses and Aberdeen and Shire Councils. The key comments from the session were:

- In general, no objections on the LEZ proposals were communicated at the session
- Will an impact assessment be undertaken and what are the timescales? It is important to understand the wider impact of the LEZ, not just on predicted improvements to air quality
- What happens if the impact assessment shows there to be a negative impact to the economy and wider society?

Bus Operators

The meeting was attended by representatives from First, Stagecoach and CPT. The invite was extended to the wider coach industry (through CPT). The key comments from the session were:

- It seems the bus is being penalised more than other vehicles and it should be noted the social benefit that the bus brings
- Funding is and has been available but it is unlikely to be sufficient
- Car parks have been excluded from the LEZ to improve accessibility but buses provide accessibility to the city and its residents
- Compliance with the LEZ will not bring much customer benefit and there is a potential disbenefit if fares are increased or services reduced as a direct result of the cost for operators to comply
- It is possible that services could reduce and/or fares could increase for operations in wider Aberdeenshire
- It seems there is a mismatch between the introduction of the LEZ and the Union Street/City Centre Masterplan proposals

4. ONLINE CONSULTATION

4.1.1 ACC set out its proposals for the LEZ scheme on its [LEZ website](#) where those wishing to provide feedback could do so through an online survey. The online survey was available between 28th June and the 22nd August 2021 and hosted by ACC's preferred consultation platform Citizens Space. Consultation responses were also accepted via email to the Council's Transport Strategy address.

4.1.2 This section of the report summarises the responses received from the online consultation. In total, there were 1754 completed responses to the online survey and 45 responses via email.

4.1.3 Of the 1754 submissions, 97% of those were individual responses and 3% of responses were from organisations or businesses, as shown in Figure 4.1.

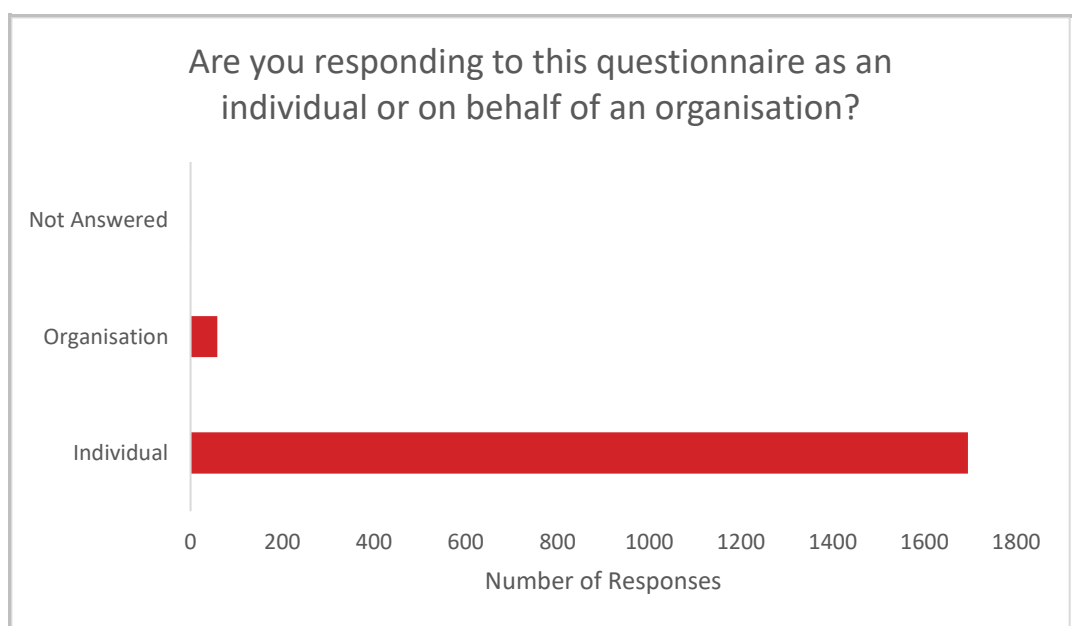


Figure 4.1 : Type of Respondent

Individual travel in the LEZ area

4.1.4 To understand the nature of movement from individuals, respondents were asked to select which responses were relevant to them from the following:

- I live within the proposed LEZ area
- I work within the proposed LEZ area
- I regularly travel to the proposed LEZ area for shopping, leisure or personal business
- I rarely or never visit the area of the proposed LEZ

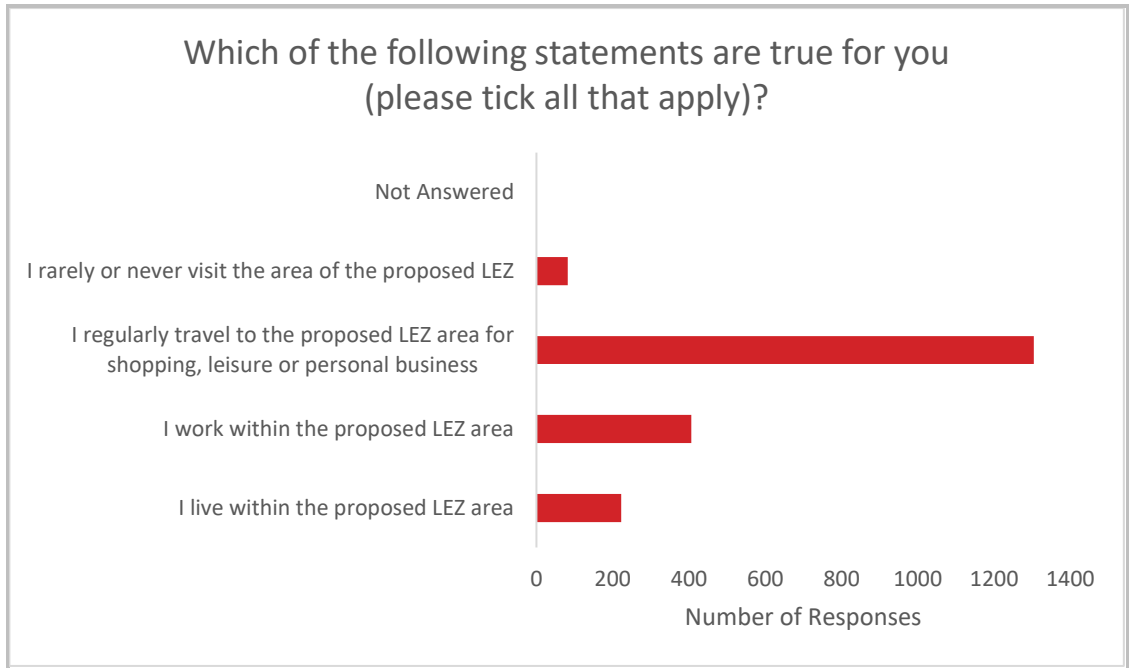


Figure 4.2 : Reasons for individuals travelling into proposed LEZ area

- 4.1.5 As shown in Figure 4.2, the vast majority of individuals, 77%, regularly travel to the proposed LEZ area for a variety of reasons, 24% work within the proposed LEZ area, 13% of individuals live in the proposed zone and 5% of individuals rarely visit the area.
- 4.1.6 Individuals were then asked *do you or members of your household rely on a private vehicle for travel to, from or within the proposed LEZ area?*. Of the responses, 87% of individuals do rely on a private car and 13% do not rely on a private car.
- 4.1.7 Finally, individuals were asked *on a scale of 1-5 (where 1 is very easy and 5 is very hard), how easy it would be for them and members of their household to comply with the LEZ by 2024?*.

Based on the information provided in the 'Proposal to make a LEZ scheme', on a scale of 1-5 (where 1 is very easy and 5 is very hard), how easy do you think it will be for you and members of your household to comply with the LEZ by 2024?

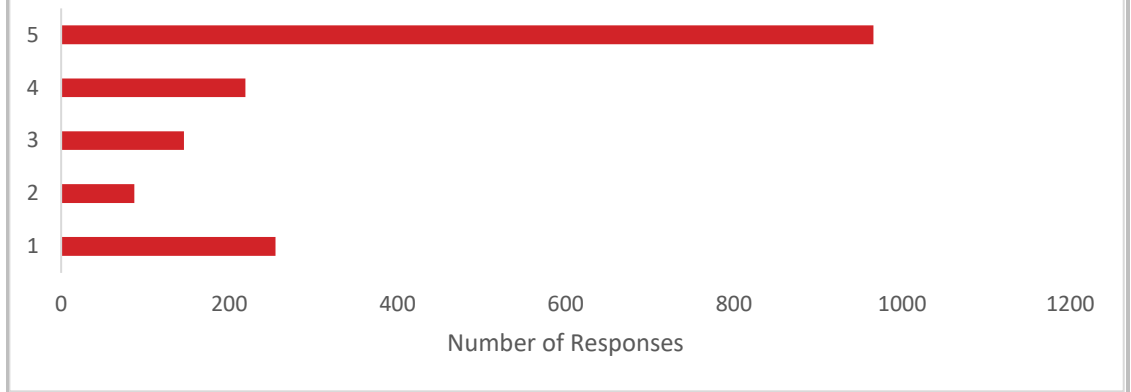


Figure 4.3 : How easy it will be for individuals to comply?

4.1.8

As shown in Figure 4.3, the majority of the respondents, 58%, believe it will be very hard to comply with the proposed LEZ. 15% of respondents believe it will be very easy to comply with the LEZ and thereafter, 13% selected 4, 9% selected 3, 5% selected 2. Respondents were able to expand on their answer and for each answer provided the comments were analysed and grouped into theme categories to provide a set of emerging themes or concerns. The main emerging themes in response to the question were as follows:

- Many respondents have concerns that the LEZ boundary will cut off access to Aberdeen Harbour and the beach area (Beach Boulevard / Esplanade) from both the south and the north with the Eastern Corridor (Market Street, Virginia Street, Commerce Street and West North Street) being included
- A general view is expressed that non-compliant vehicles will have to take a longer journey causing more pollution and travel and time cost to the individual.
- Non-compliant vehicles avoiding the LEZ area may create rat-runs causing concern for the residential areas near the boundary
- There was considerable concern on the ability of residents to get to work. This was true for those working inside the LEZ area and those travelling through the LEZ area. This was noted particularly relevant for those looking to utilise the Eastern Corridor or Denburn Road. In addition it was noted the workers who require their vehicle for work purposes (i.e. not solely for commuting) or to access work at unsocial hours will be adversely affected by the LEZ
- Public transport is not considered a viable option for many individuals. Views expressed included it being considered too expensive, it does not extend to all areas of Aberdeenshire and it does not run frequently enough

Business and the LEZ

4.1.9 As noted above 3% of responses (58 in total) to the online questionnaire were from organisations or businesses. Submissions were received from a range of organisations such as small local businesses, national organisations, charities and national bodies. A number of statutory stakeholder provided their response to the LEZ proposals through the online portal and these have been extracted and included in the stakeholder Chapter above. The following businesses (excluding statutory stakeholders) responded to the online survey:

- McDonalds
- William Black and Son Ltd.
- MS Services
- Aberdeen Mobile Machinery Services
- Destiny Partnership
- Quids In Theatre Company
- VSA
- Carmelite Hotel
- Somers Fishing Tackle
- Belmont Filmhouse
- Pure Beat Radio
- DaVinci Restaurant
- Lakeland
- Direct Waste Management
- Hunter Construction
- Silver City Wedding Cars
- Café Contour
- Caber Coffee
- MN Hamilton
- Bennett Security
- Gamola Golf
- Envirope
- Park Electrical Services
- R&Q
- Pattersons of Aberdeen Ltd.
- Colin Harkness Joinery
- Hebron Evangelical Church
- Enterprise Holdings
- The Scottish Motor Trade Association Ltd
- Workman FM
- Women's International Motorcycle Association (WIMA)
- Scottish Wholesale Association

4.1.10 Note, not all businesses chose to provide the name of their organisation.

4.1.11 To understand the nature of movement from organisations, businesses were asked to select responses that were most relevant to them from the following:

- My organisation is located within the proposed LEZ area
- My organisation regularly requires vehicles to travel through the proposed LEZ area.
- My organisation requires infrequent travel through the LEZ area

○ Other

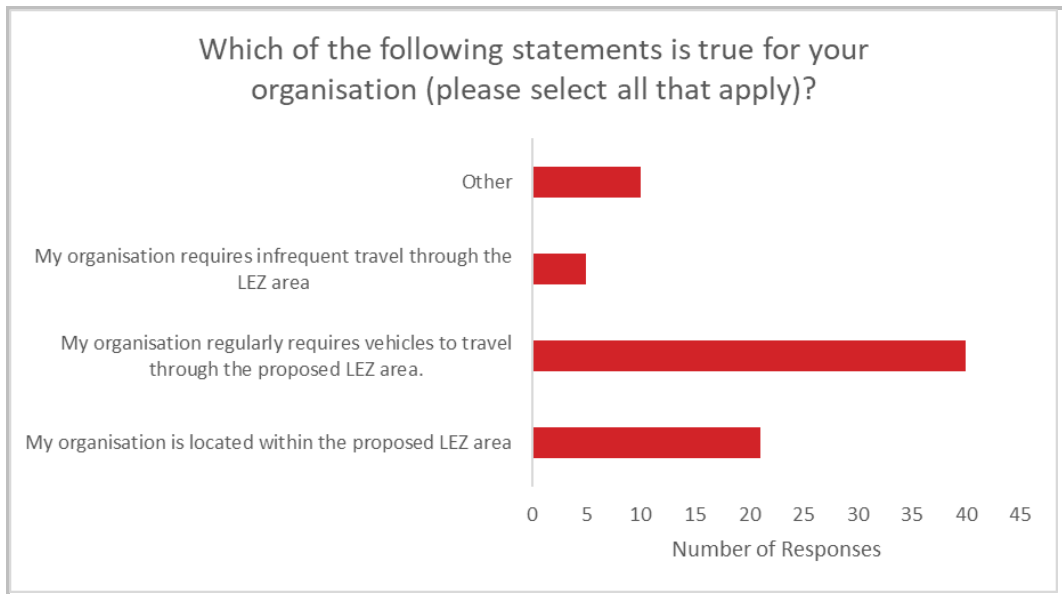


Figure 4.4 : Organisations responding to the LEZ proposals

4.1.12 As shown in Figure 4.4, the majority of organisations, 53%, regularly require vehicles to travel through the LEZ, 28% of organisations that responded are located within the proposed LEZ area, 7% of organisations require infrequent travel through the proposed LEZ area and 13% of the organisation respondents selected other. Those that responded “Other” were predominately charities or national public bodies.

4.1.13 Organisation were asked on a scale of 1-5 (where 1 is very easy and 5 is very hard) how easy it will be for them to comply with the LEZ by 2024?.

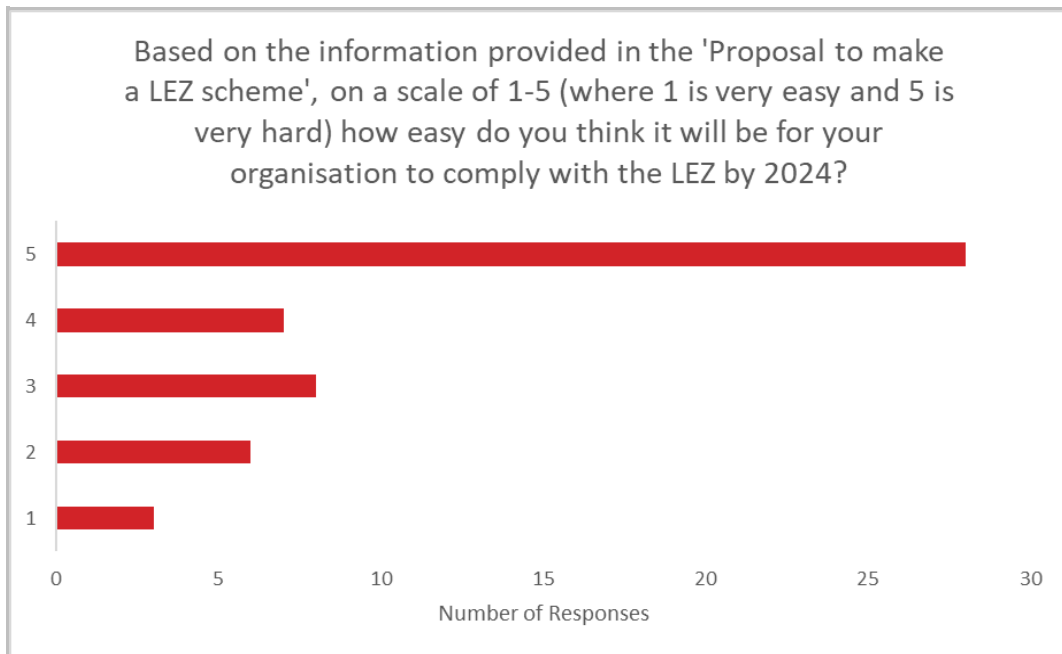


Figure 4.5 : How easy it will be for organisations to comply?

4.1.14 As shown in Figure 4.5, the majority of the respondents, 54%, believe it will be very hard to comply with the LEZ by 2024, with all other options receiving broadly the same number of selections (13% selected 4, 15% selected 3, 12% selected 2 and 6% of the organisation responses selected 1 (easy to comply)). As with the individual responses, businesses were able to expand on their answer and the emerging themes were:

- Unable to upgrade fleet/ vehicles in time period due to the financial climate
- Non-compliant vehicles may have to reroute through residential street which is a cause for concern
- Customers may stop using businesses within the LEZ

Proposed LEZ for Aberdeen

4.1.15 To understand the opinion respondents have about LEZs and their introduction, all respondents (individual and business) were asked *generally, are you in favour of a Low Emission Zone in Aberdeen?*

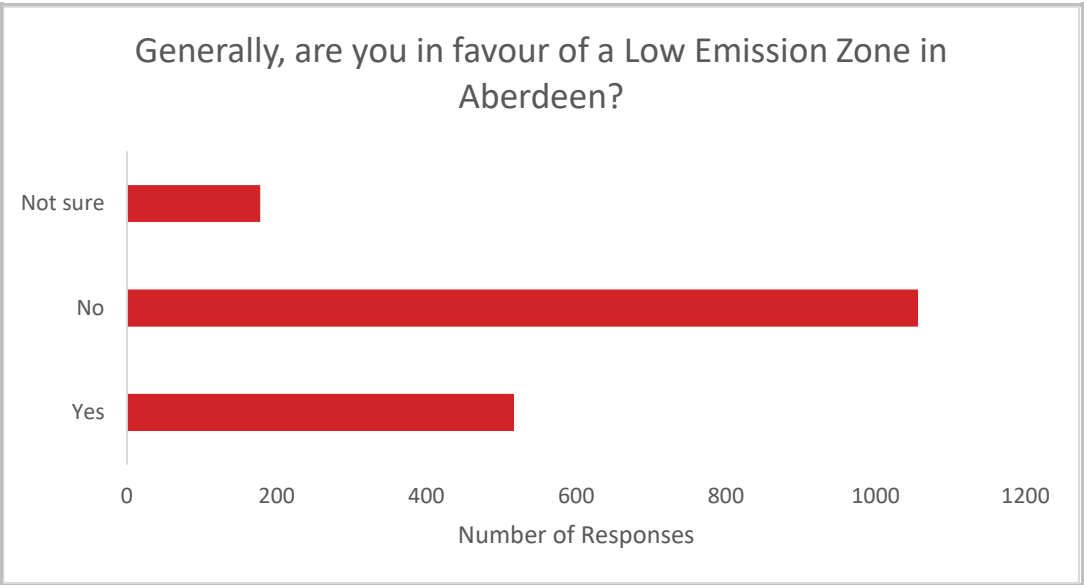


Figure 4.6 : Support for LEZs in general

4.1.16 The majority of the respondents (60%) are not in favour of an LEZ. Given the nature of any consultation, it is perhaps expected that those individuals with concerns on the LEZ take the time to complete the survey whereas those who agree with the proposals may be less inclined to do so. However, 30% of responses support a LEZ with a further 10% not sure.

4.1.17 For those respondents that provided reasons to their answer, the emerging themes were similar to the comments noted above. Additional themes that emerged were:

- The implementation of the LEZ will reduce the footfall in and around the LEZ area which may cause business to go of business
- The LEZ will disadvantage those from a less affluent background who are less likely to be able to afford to upgrade to a compliant vehicle
- There is a general perception that ships produce high volumes of pollution and many respondents believe ships should be included in the scheme
- A number of respondents would prefer to see Union Street pedestrianised instead of the city introducing a LEZ

4.1.18 The remainder of the questionnaire was specific to the Aberdeen LEZ scheme proposals. Alongside a scheme diagram of the LEZ, all respondents were asked *do you agree with the proposed LEZ boundary?*. The results are shown in Figure 4.7

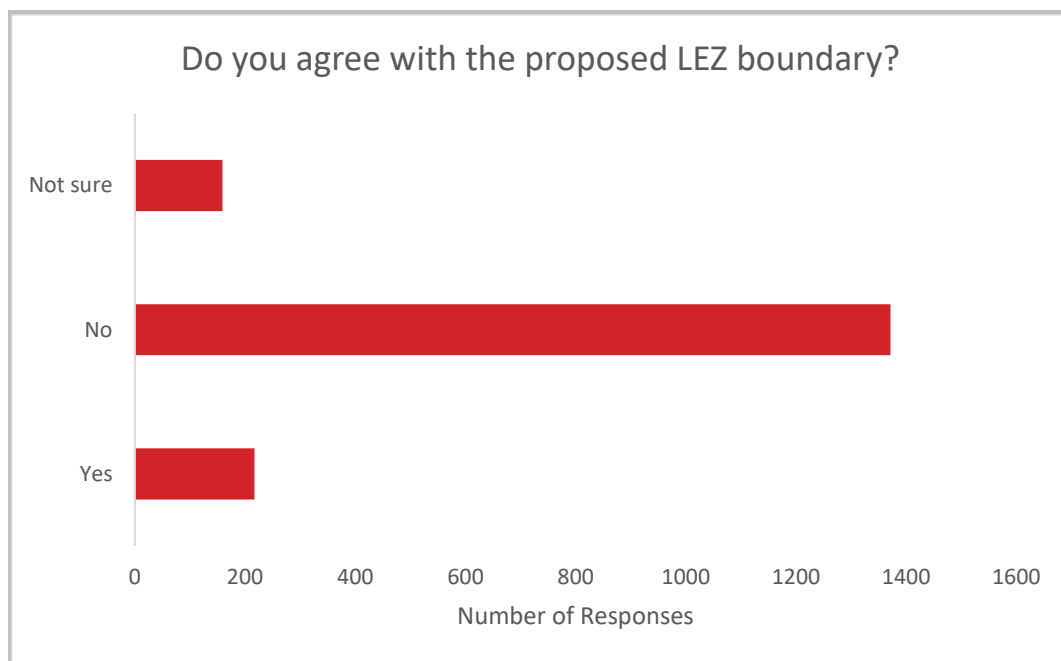


Figure 4.7 : Level of support for the proposed LEZ boundary

4.1.19 The majority of respondents (78%) are not in agreement with the current proposed LEZ boundary. Respondents were asked to provide reasons for their answer and the key concerns are outlined below:

- In disagreeing with the LEZ proposals, a large number of respondents do not believe there should be a LEZ in Aberdeen
- There is concern that the Eastern Corridor is included in the LEZ boundary, with Virginia Street commonly highlighted as a key road used by many. Other roads causing concern on their inclusion in the LEZ are:
 - Market Street
 - Commerce Street
 - East North Street
 - Denburn Road.
- In line with the views expressed above, the inclusion of the Eastern Corridor is believed to cut the south of the city off from both the beach area and north Aberdeen for non-compliant vehicles. Similarly, access to the north Harbour area is highlighted as a key concern
- Not all responses disagreeing with the LEZ proposals (from the 78%) were against a LEZ for the city. A number of comments made were concerned that the proposed LEZ is not large enough and does not cover enough of the city with more needing to be done
- A number of comments were made that pedestrianising Union Street would be more effective and less disruptive

4.1.20 Respondents were then asked if they *agree with the proposed 2 year grace period until LEZ enforcement will commence* and were also given the opportunity to expand on their answer. The results are shown in Figure 4.8.

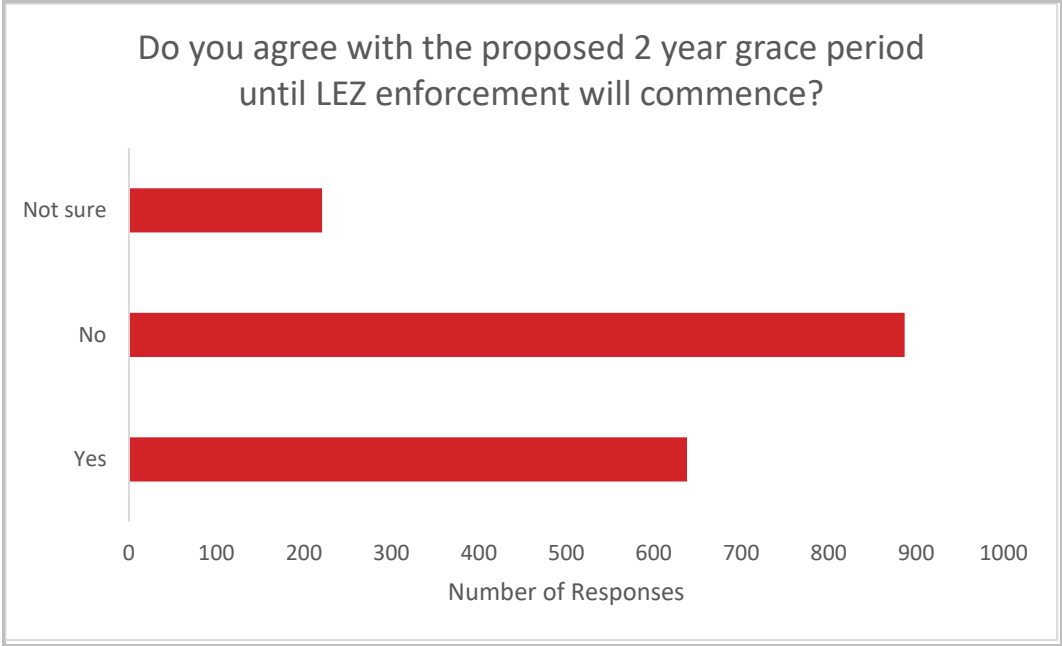


Figure 4.8 : Support for proposed grace period

4.1.21 51% of respondents do not support the two year grace period with the majority of those disagreeing with the two year grace period preferring to see a longer grace period to allow more time to comply with LEZ standards. Some of those that do not agree with the proposed grace period stated that they do not agree with the LEZ in its entirety (and therefore any grace period). Conversely, some respondents who disagree with the two year believe it is too long given the delay already in introducing the LEZ. 37% of respondents agreed with the proposed two year grace period and 13% were not sure.

4.1.22 The final question in the questionnaire was *in your view, should any additional time-limited exemptions (in addition to the national exemptions described in the 'Proposal to make a LEZ scheme') be granted to any particular user group or class of vehicle?.* Again respondents were given the opportunity to expand on their answers. The results from this are presented in Figure 4.9.

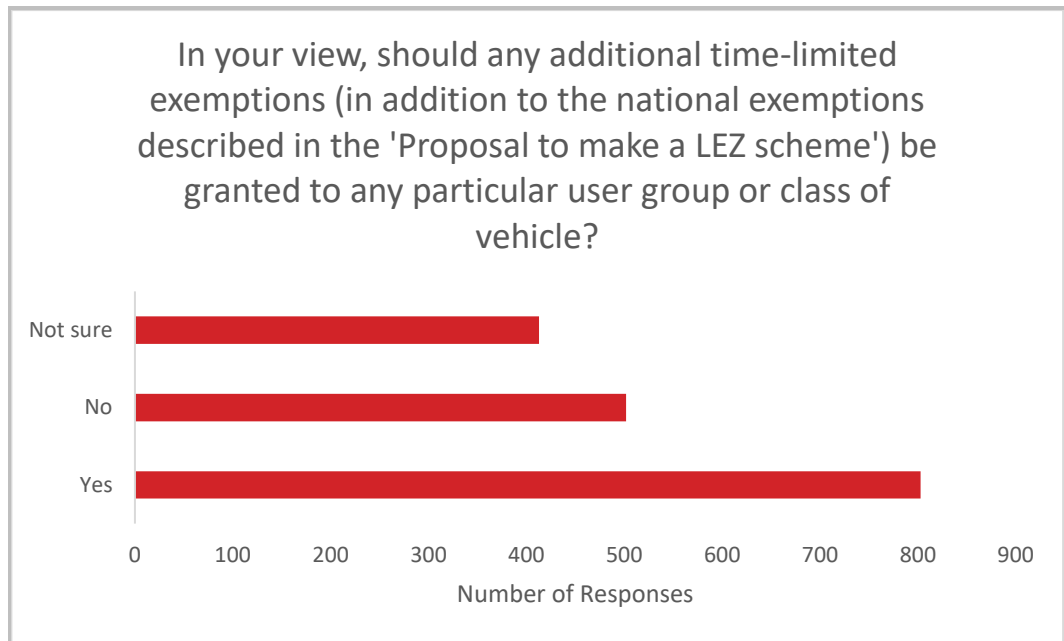


Figure 4.9 : Time-limited exemptions

4.1.23 29% of respondents don't think there should be any additional time-limited exemptions, 24% of respondents were not sure. 47% of respondents have the opinion that there should be some additional time-limited exemptions and made comment to identify the groups that should be considered:

- Residents of a registered address in and around the boundary should be offered additional exemption as residents do not have an option to reroute
- People with businesses and workers within the LEZ, including tradesmen and delivery drivers
- Concerns about the impacts on the disabled if not granted exemption from the LEZ as well as other vulnerable groups that do not hold blue badges
- Those that are unable to afford a new vehicle, providing a means tested exemption

5. RESPONSE TO SUBMISSIONS, COMMENTS AND CONCERNS ON THE PROPOSED LEZ

5.1.1 The eight-week consultation period with members of the public, key stakeholders, businesses and organisations has raised a number of questions and concerns on the proposals for a LEZ in Aberdeen. This section provides a response to the key concerns, utilising the evidence base and analysis undertaken to identify the preferred LEZ scheme.

5.1.2 **Comment:** The LEZ may result in increased congestion in the city, particularly around the periphery of the LEZ boundary.

Response: Chapter 6 of the [LEZ Traffic Model Testing Report](#) focuses on the management of displaced traffic resulting from non-compliant vehicles seeking alternative routes to avoid the LEZ and also compliant vehicles being displaced as a result of Union Street restrictions. The final LEZ boundary has the effect of restricting access through the city centre, consistent with established ACC policies. Initial traffic model testing of the final LEZ proposed boundary showed that non-compliant traffic (due to the LEZ) and compliant traffic (due to Union Street restrictions) were finding local routes around the periphery of the LEZ, within the boundary of Anderson Drive. This was particularly notable around the southern and western edges of the LEZ, such as Milburn Street and Ferryhill Road and the Springbank Terrace / Willowbank Road corridor.

Several options were examined to better manage the displacement of traffic, fully detailed in the Model Testing Report, where it was identified that a revision to the operation of the Milburn Street / South College Street junction restricts or prevent strategic traffic easily routeing around the southern and western boundary of the LEZ.

Model testing showed that introducing banned right turns at junctions onto Springbank Terrace, such as from Crown Street and Bon Accord Street, significantly reduced the instances of congestion and rerouting around the periphery of the LEZ. ACC will monitor traffic flows around Springbank Terrace upon implementation of the LEZ and assess whether such measures are required.

In addition, it should be noted that given the impact Covid-19 is having on trip making, future travel patterns are still uncertain. There is therefore a high degree of variability in the various plausible futures of the city centre traffic network and therefore ACC is committed to continually monitoring traffic patterns to ensure that upon introduction of the LEZ, all required mitigation is explored to reduce any instances of congestion and rerouting.

5.1.3 **Comment:** The proposed zone is not large enough or ambitious enough and should include all or the majority of city centre car parks and their exclusion does not promote the needed shift to sustainable travel modes.

Response: The [Interim NLEF Stage 2 Report](#) and accompanying [LEZ Traffic Model Testing Report](#) details the appraisal and testing of possible LEZ scenarios encompassing areas larger (and smaller) in geographical area than the final proposed LEZ. Many of the larger options examined result in a detrimental impact to the network traffic conditions (including increased congestion, queueing and therefore emissions) and would likely have a detrimental impact on the economy and wider society. The inclusion of large areas of the city where there are currently no air quality issues would be harmful and unfair to those living in these areas and increase the cost to comply with the LEZ and the cost of implementing the LEZ.

The analysis considered in detail the accessibility of all major car parks in the city. The final option to be sifted out as a potential LEZ option encompassed all city centre car parks.

Appraisal against the LEZ objectives and economic, accessibility and social inclusion criteria (Chapter 13 of the [Interim NLEF Stage 2 Report](#)) concluded this not to be a viable option, particularly for access to city centre services and amenities for those who rely on transport made by non-compliant vehicles (particularly impacting vulnerable groups).

5.1.4 **Comment:** The LEZ cannot be introduced in isolation and should be delivered alongside measures to promote and increase active travel and a shift to sustainable modes, such as improved cycle and walking infrastructure, and in consideration of key ACC strategies and projects such as the City Centre Masterplan.

Response: *ACC consider the LEZ as one element in the transformational change planned for Aberdeen. Proposals to progress the City Centre Masterplan and provide increased bus priority and pedestrian/active travel provision are currently being explored by Council officers. Several multi-modal studies are ongoing, focussing on key transport corridors in the city and options to provide additional Park and Ride facilities are currently being examined.*

5.1.5 **Comment:** The two-year grace period is too long and it should be as short as possible.

Response: *The minimum grace period after the introduction of a LEZ is one year. Consultation with bus operators and local businesses informed that recovery from the unprecedented Covid-19 pandemic will take many years and many would not be able to comply with LEZ emission standards by 2023. Giving one year additional grace (when up to three years could have been given), allows for bus operators, businesses and residents of Aberdeen and surrounding areas to plan for the LEZ introduction and mitigates against any unintended consequences of enforcement at an earlier date.*

5.1.6 **Comment:** The LEZ should not include the Trinity Centre. The current LEZ boundary results in the Trinity Centre being the only shopping centre remaining in the LEZ.

Response: *Cognisance of this objection is made and additional traffic modelling will be undertaken to assess the impact and potential of excluding the Trinity Centre (and Wapping Street gyratory) from the LEZ.*

5.1.7 **Comment:** There is considerable concern over access to Aberdeen Harbour, particularly from the north of Aberdeen but also for the movement of goods between the southern and northern harbour areas. Similarly, there is a feeling that including the Eastern Corridor (Market Street, Virginia Street, Commerce Street and East/West North Street) will isolate some parts of the city from others. This was noted by stakeholder consultation and through the online public response.

Response: *The inclusion of the Eastern Corridor in the LEZ restricts all non-compliant vehicles from routeing north-south through the city and contributes to a reduction in air pollution along this corridor (where some of the highest recorded levels are seen). However, it is recognised that the inclusion of the Eastern Corridor will result in accessibility issues for some non-compliant vehicles. As such, additional traffic and air quality modelling will be undertaken to detail the impact of fully or partially opening the Eastern Corridor to non-compliant traffic under the following option tests:*

- *Existing LEZ boundary with East North Street and Commerce Street removed from the LEZ*
- *Existing LEZ boundary with the full Eastern Corridor removed*

Outcomes from the additional model testing will inform the viability of providing additional access along the eastern boundary of the LEZ for non-compliant vehicles.

5.1.8 **Comment:** Concern was expressed for people living in areas of deprivation and the risk in the health inequalities that an LEZ may bring. It was expressed that the LEZ will disadvantage those from a less affluent or vulnerable backgrounds who rely on non-compliant vehicles cannot afford a new vehicle.

Response: *The LEZ proposals have been subject to an Integrated Impact Assessment and this concluded that when the LEZ is delivered with exemptions and funding support, the unintended impacts can be minimised and mitigated against. ACC will continue to promote and support opportunities as they become available.*

6. KEY OUTCOMES FROM CONSULTATION

- 6.1.1 In line with The Act 2019, Aberdeen City Council (ACC) launched an eight-week consultation from 28th June 2021 to 22th August 2021 on its proposed LEZ scheme for the city, as agreed at the [City Growth and Resources Committee](#) on 24th June 2021.
- 6.1.2 The statutory consultation period consisted of the following elements:
- Email correspondence to statutory consultees advising of LEZ proposals
 - Stakeholder workshops
 - Online survey seeking views on the proposed LEZ option
 - Information flyer delivered to residents and businesses in proposed LEZ area
- 6.1.3 ACC received written submissions from 34 stakeholders, businesses or interest groups. In general all responses supported the introduction of the proposed LEZ in Aberdeen however some responses (notably those from health and green groups) believe the LEZ should be larger in size and scope. There was also notable concern around access to Aberdeen Harbour, particularly from the north of Aberdeen, for non-compliant vehicles.
- 6.1.4 ACC also set out its proposals for the LEZ on its [LEZ website](#) where those wishing to provide feedback could do so through an online consultation form. There were 1754 completed responses to the online consultation. The majority of responses from both individuals and businesses did not express support for the LEZ. A common concern noted among respondents was access and the availability of routes north-south for non-compliant vehicles. This ties in with concerns around access the Aberdeen Harbour and the inclusion of the Eastern Corridor in the LEZ area.
- 6.1.5 The statutory consultation has therefore highlighted the need to examine boundary adjustments on the eastern side of the LEZ to ensure the correct LEZ area is chosen that protects the city from harmful levels of air pollution while still providing suitable access to key areas in the city. As such the outcome from the statutory consultation is to recommend three further traffic and air quality model tests are undertaken as follows:
- Wapping Street / Carmelite Street / Guild Street gyratory removed from the LEZ area
 - East North Street and Commerce Street removed from the LEZ area
 - The full Eastern Corridor (ENS / Commerce St / Virginia St / Market St) removed from the LEZ area
- 6.1.6 The outcomes from these option tests will be detailed in an updated model testing report and used to inform a final LEZ boundary to be submitted to Scottish Ministers.