Aberdeen Low Emission Zone Public and Stakeholder Consultation

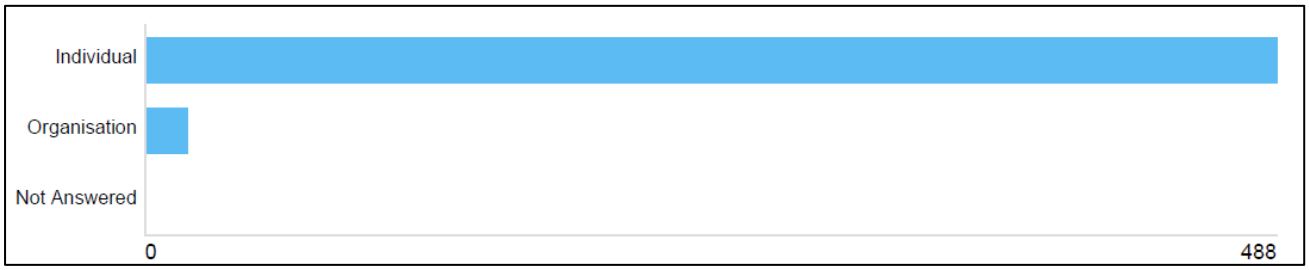
Introduction

Public and stakeholder engagement on options for Aberdeen's Low Emission Zone took place during September and October 2020. This took the form of: an online survey available between 14th September and 25th October 2020 hosted by Aberdeen City Council's preferred consultation platform Citizens Space; and a series of stakeholder workshops co-ordinated by SYSTRA, the consultant appointed by ACC to lead on LEZ appraisal and modelling. Consultation responses were also accepted via email to the Council's Transport Strategy email address.

In terms of consultation responses, 506 were received via Citizens Space, and 7 via email.

Citizens Space Questionnaire

Of the 506 responses were received, 488 (96.5%) were from individuals, 18 (3.6%) were from businesses.



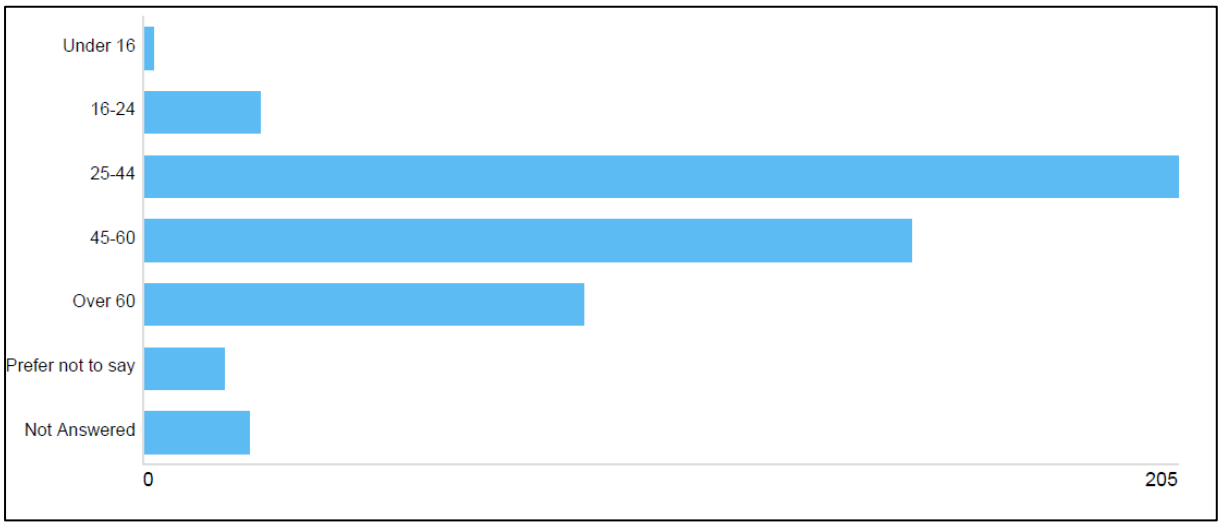
Those businesses responding to the online questionnaire were:

- First Aberdeen Limited
- Stagecoach Bluebird
- Blacks of Brechin
- Royal Mail Group
- Road Haulage Association
- The Shore Porters Society
- Leiths (Scotland) Ltd
- Scottish Enterprise
- City Gate Aberdeen Ltd.
- HEAT
- Friends of the Earth Scotland
- Asthma UK and British Lung Foundation Partnership
- British Heart Foundation Scotland
- Electric Vehicle Association Scotland
- Low Carbon Vehicle Partnership
- Rosemount and Mile End Community Council
- Cults, Bieldside and Milltimber Community Council
- Paths for All

Demographic Information (Individual Respondents)

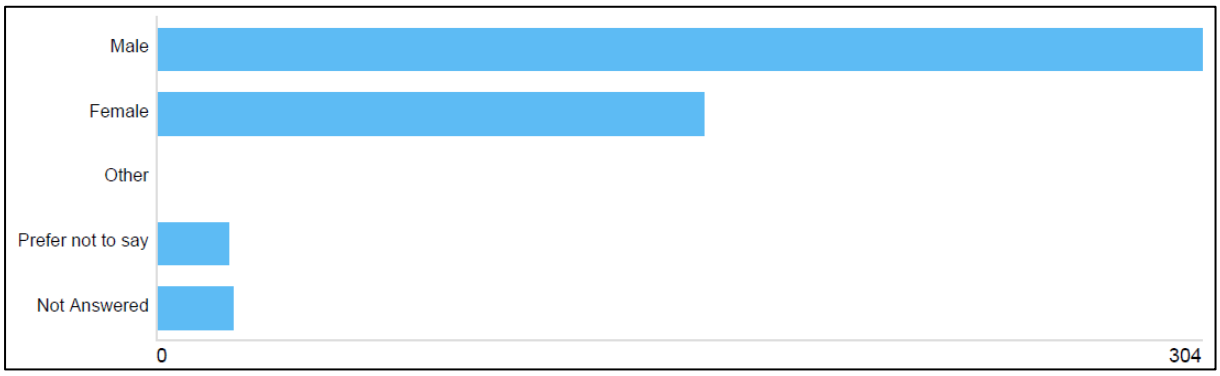
Age

All adult age groups are reasonably well represented in the responses, with perhaps a slight under-representation of the under-24s and significant under-representation of the under 16 age group.



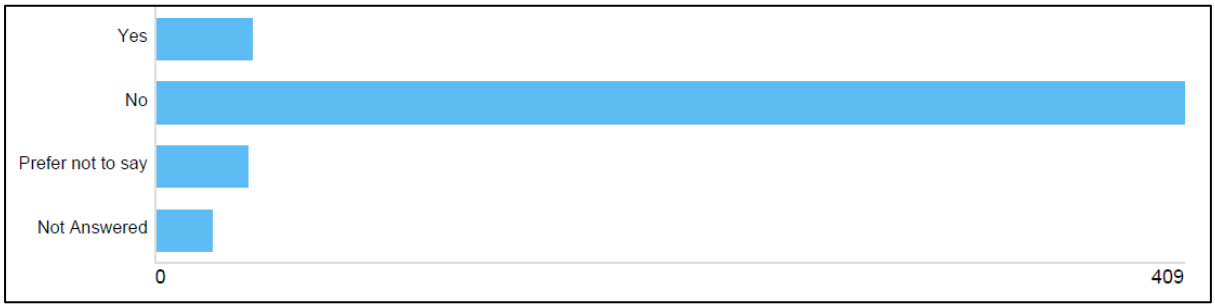
Gender

More males (60.1% of respondents) than females (31.4%) responded to the questionnaire, with 8.5% of respondents choosing not to answer the question.



Disability

7.5% of respondents (38 respondents) stated that they have a disability affecting their travel arrangements, while 80.8% do not, with 11.7% of respondents choosing not to answer the question.



When travelling to, from and within Aberdeen city, what modes of transport do you typically use?

Respondents were asked to select all forms of transport relevant to them.

The majority of respondents (77.9%) were regular car drivers in the city centre, while 46.4% walk in the city centre, and 32.8% use the bus to access the city centre. Smaller proportions were noted for cycling (20.8%), the train (12.5%), taxi (9.1%), motorcycle (5.9%) and van (3.4%). Users of all main modes of transport in the city centre are therefore represented in the survey results.

Other options given by respondents were: heavy goods vehicle, motorhome, historic vehicle, ferry, and Motability scooter.

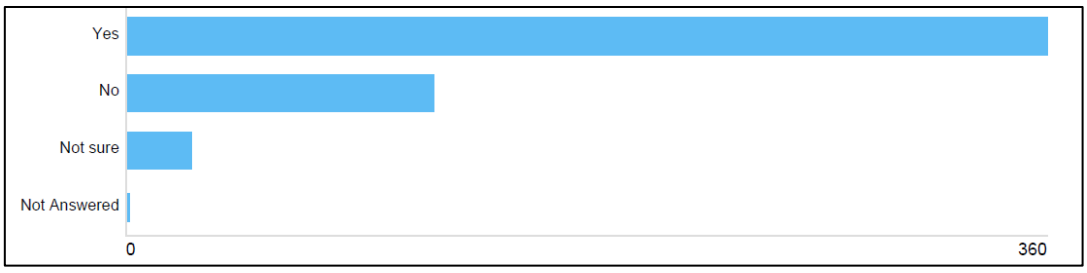
Postcodes

Postcode data was requested to understand the locations of respondents. Unsurprisingly, given the local nature of the proposals, the vast majority of respondents were located in Aberdeen City and Aberdeenshire. Responses were also received however from respondents in the following postcode areas: Dundee, Edinburgh, Elgin, Glasgow, Livingstone, Luton, Perthshire, Shetland and Southampton.

Awareness of Air Quality Problems

Before starting this survey, were you aware of the air quality problems in Aberdeen city centre?

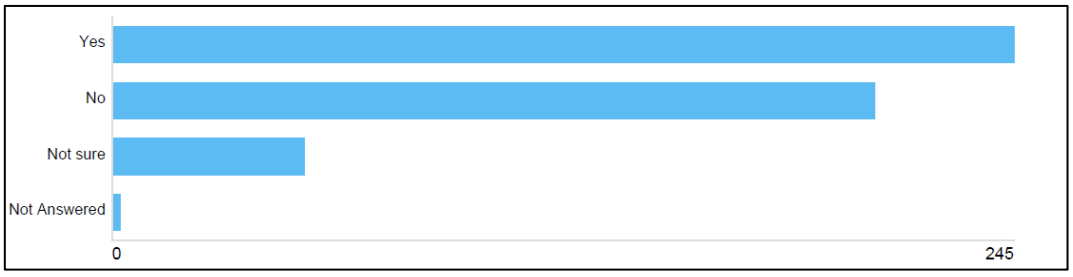
Awareness of issues of poor air quality in Aberdeen appears good with the majority of respondents (360 – 71.2%) aware of Aberdeen's air quality problems. 120 respondents (23.7%) were not aware, while 4.9% were not sure.



Attitudes Towards Low Emission Zones

Generally, are you in favour of Low Emission Zones to tackle poor air quality?

Nearly half of the respondents (245 - 48.4%) are in favour of LEZs, with 40.9% (207 respondents) not in favour and 10.3% unsure.



Respondents were invited to expand upon their answer to this question.

Reflecting the fact that respondents were on the whole more positive than negative on the subject of LEZ, many comments were supportive of the introduction of a LEZ in Aberdeen. In terms of the supportive comments, major themes were:

- Recognition of the beneficial health impacts (*Poor air quality is a significant contributory factor to respiratory and cardiovascular diseases. It is a modifiable risk factor therefore we can and should reduce pollution to improve public health*);
- Recognition of the environmental benefits (*Cars are killing the planet and us, no point arguing when the planets on fire*);
- Appreciation that LEZs can contribute to improved quality places and quality of life (*An LEZ in Aberdeen city centre will improve the experience of visitors to the city (shoppers, tourists, workers etc) but more importantly will improve the lives of those who live there*);
- Appreciation that LEZs can improve the city centre (*Low Emission Zones are a good way of encouraging…more welcoming spaces for people living, working and shopping in the city*);
- Recognition that LEZs can have wider benefits in terms of encouraging more sustainable transport choices (*The LEZ zone and associated reduction in vehicular traffic and pollution in the city centre will encourage more sustainable forms of travel through the city centre and across the city - walking, cycling, public transport and low carbon vehicles*); and
- Evidence from elsewhere testifying to the success of LEZs (*Having lived in Germany for many years, city centres controlled by LEZ were much more pleasant to visit and live. The LEZ compliments pedestrianised city streets well*).

A number of respondents stated that a LEZ should form part of a package of measures to support more sustainable travel behaviour and reduce emissions:

- *This is particularly important for those who live and work in the town centre but has to be part of a general move to encourage walking, cycling and public transport use in the city as a whole*;
- *While the idea seems lovely, it needs to be carried out in conjunction with making sure that public transportation provides a viable alternative*;
- *We note that LEZs may have a role to play in improving local air quality and prioritise vehicle replacements in areas where LEZs are enacted. We also believe there are a number of other ways to reduce transport emissions - such as through the development of electric vehicle charging infrastructure and trialling new low emission solutions such as hydrogen – which could be more effective*.

Sone felt that there are better ways to reduce emissions such as improving traffic flow through affected areas (*Improvements to Improving traffic flow through and round Aberdeen would have greater benefit without negatively impacting businesses in the centre*) or traffic management interventions (*You would be better off changing the road layouts so the city centre isn't a through road*), while others felt that proposals should go further (*We should be reducing total emissions, not just moving them around*; *Union street and city centre should be fully pedestrianised*).

In terms of those expressing concern about, or objections to, a LEZ, the main issues raised related to:

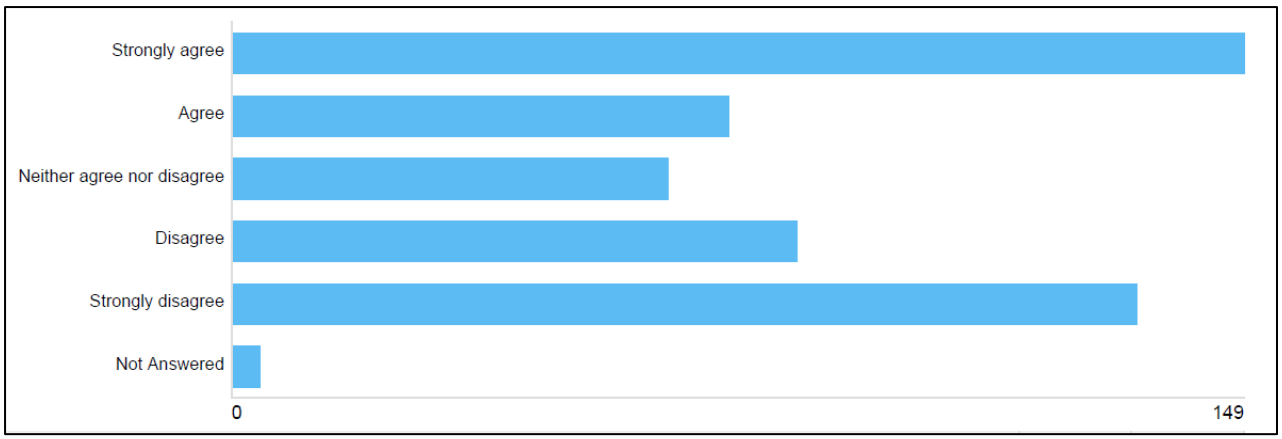
- The impacts on individuals, particularly the financial implications (*It is also a significant issue for residents within these areas, why should they be forced to change their vehicle, likely at financial penalty to themselves*), especially given that the impacts of the COVID-19 pandemic may be felt for some time (*Unemployment in Aberdeen and Aberdeenshire is on the rise and people cannot afford to change their cars so they can drive in this LEZ*);
- Concerns that the less affluent members of society will be disproportionately impacted (*Typically these schemes negatively impact low income households most as they cannot afford*

to upgrade cars that are not compliant and are then either banished from town centres or have to pay significant sums to enter the town centre) ;

- Concerns about the impacts on the disabled if not granted exemption from the LEZ (*I am registered disabled & on benefit. My car is a 2012 diesel. How would you propose me to get around otherwise?!)*
- Concerns about the impacts of proposals on the future health and prosperity of the city centre (*Now is not the best time to implement this. The city centre is dying on its feet as a result of internet shopping and now covid. It's dying and this will be the final blow. Remember, people visit the town as a day out, as everything can be bought cheaper and more conveniently on the internet*) and local businesses (*Concerned about economic effect on small medium businesses in city centre*);
- Concern that the LEZ could simply move traffic, and resulting congestion and emissions, elsewhere (*Drivers will simply avoid the LEZ by going around the peripheral and greatly intensify the traffic in these areas while at the same time simply shift the problem onto these areas*);
- Concern about the current scope of the LEZ, whether it was correct to address all vehicle types (*Its mostly buses and lorries that cause the pollution. Pollution reducing efforts should be focused on them*), whether the emissions standards being proposed are justified (*We are in favour of Low Emission Zones; however, enforcement based on emissions standards and ANPRs is not a valid or fair method since real-world driving emissions are much higher than laboratory tests indicate*), and whether the impacts of the harbour should be considered (*Not really seeing the point of targeting road vehicles in a city which has the busiest harbour in the UK from which goodness knows how many diesel powered ships enter and exit the harbour area near the town centre*);
- Concern that decisions are being made on outdated evidence, questioning whether the impacts of the Aberdeen Western Peripheral Route (*Since adoption of the WPR the emissions have drastically reduced in the city centre. There needs to be a re-evaluation of the data as it is currently not historical data*) and COVID (*Costs involved may not be appropriate now with reduction in traffic post covid 19*) have been adequately considered;
- A perception that this is simply a revenue-generating scheme (*Its just a money making scheme*); and
- Scepticism that the problem in Aberdeen is such that these measures are required (*Where there is a public health concern I think Low Emission Zones should be considered. I am not convinced however that the levels faced in Aberdeen warrant a Low Emission Zone*).

Given that air quality in Aberdeen city centre exceeds national objectives and EU limit values in a number of areas and the main source of this is road traffic, do you agree that a Low Emission Zone is an appropriate response to this?

29.5% of respondents strongly agreed with a LEZ as a response to air quality issue in Aberdeen, while a further 14.4% agreed. 26.3% strongly disagreed and 16.4% disagreed. 12.7% of respondents were unsure.



Combining responses, there is a near even split between the proportion of respondents supportive of (43.9%) and not supportive (42.6%) of a LEZ in Aberdeen.

Respondents were invited to expand upon their answer to this question.

In terms of responses supportive of a LEZ, comments were along similar themes to those received for the previous question, in terms of the health and environmental benefits of LEZs (*I feel that given the urgency of the climate emergency and also with COVID exposing the impacts of underlying health conditions, we need to clean up our act and the local scale is the most tangible and perhaps one of the most effective ways to do this. Clean air is a human right!).* Some respondents felt that a response to this issue is long overdue (*A LEZ is not just necessary; it is long overdue*) and / or that LEZ proposals don't go far enough (*This should not only be applied to the city centre, but also to other areas of the city where air pollution is high).*

Some responses suggest that a LEZ is part of the solution but not the whole solution and must be combined with other measures to encourage behaviour change (*I believe it is an appropriate response just now but longer term would like to see removal of traffic in general from the city centre area and more priority given to buses, cyclists and pedestrians*; *LEZ are a step in the right direction. However, it barely scratches the surface in terms of a sustainable, long term approach*) or to reduce overall traffic (*Low emission zones are a good response but more should be down to reduce all traffic more generally*).

Similar to the responses to the previous question many feel that there are other measures that should be put in place prior to or instead of a LEZ such as measures to reduce congestion and improve traffic flow (*A more appropriate response is to remove the congestion in the centre by getting better traffic flow*), and improving active travel (*encouraging people to use alternative transport is also vital. Cycle lanes in Aberdeen are terrible, often impossible to cycle in due to potholes and sunken manhole/drain covers*) and public transport (*Possibly explore making public transport more affordable, with more regular and accurate times*) opportunities.

Again, concern was raised about the impact of a LEZ on the city centre and businesses (*We have an issue with retail in our high streets suffering. Restricting traffic in the city centre will speed up the demise of shops in this area*) and individuals (*This is just a way to make money at the citizens expense. Stopping people moving around the city freely*), particularly the disabled (*As a disabled pensioner who relies on my car to reach shopping in town with an older car it would appear if I move from my home in the Bridge of Don I will have to pay. You are effectively making me a prisoner and cutting me off from visiting any of the shopping centres*) and the less affluent (*People on lower incomes may not be able to afford compliant cars and therefore cannot access the city?).*

Comments were received on the scope of the LEZ with some respondents believing that all vehicles should be addresses (*All should be tackled, not just cars*; *Busses and lorries mostly cause the pollution. Personal cars should be exempt*), while others singled out particular vehicle types for attention (*Ban buses and heavy goods vehicles from the city centre and surrounding areas*).

Similar to the previous questions, concerns were also raised about:

- the potential for a LEZ to simply force traffic and emissions elsewhere (*If you turn the city centre into a LEZ, you will only be diverting high emission vehicles elsewhere possible into residential areas*);
- the timing of LEZs given the disruption resulting from the COVID-19 pandemic (Too much going on with Covid etc and traffic reduced due to the new system in town);
- the data being used, in particular whether this is reflective of the opening of the AWPR in 2019 (Data taken was from before opening of the AWPR) and any recent changes resulting from the pandemic (a survey from 2019 on levels of pollution bears no relation to the actual traffic pollution levels during 2020 given the lack of traffic since March and the town centre basically shut off to all traffic for the foreseeable future);
- the extent of the actual problem in Aberdeen with some scepticism evident (*As mentioned above, I think that the figures are hard to believe, as my experience of Aberdeen City centre, compared to other major cities has cleaner air*) and a feeling that things will improve naturally over time (*Emissions will reduce in time by people replacing their vehicles without the need for another layer of bureaucrat if restrictions*).

<u>Views on the LEZ options</u>

Option 1A - Advantages

Respondents were first asked what they believed were the advantages of this option.

Obviously, one of the main advantages identified was that this option would lead to reduced emissions and improved air quality (*This reduces the pollution risk in the areas where large numbers of people will be walking*). Respondents also identified knock-on benefits such as reduced traffic volumes, less noise, safer streets, and consequently a more welcoming urban realm (*This area could be far more pleasant to live, visit and spend time in if this LEZ was implemented*) that could encourage more usage of the city centre.

In terms of the scope of the zone, respondents welcomed that fact that the majority of areas of air quality exceedance are captured by this option (*it covers the most polluted area*), but that accessibility to main destinations such as the main car parks, harbour and ferry terminal are not significantly impacted (*Additionally access to shopping centres like union square still possible by family who need to take the car and have an older car*; *Cohesive central area and allows lorry traffic from and to the Harbour to use market St, Virginia St and King St without hindrance*).

The fact that this is the smallest area under consideration was seen as an advantage by some, in terms of being the easiest (and possibly cheapest) option to implement. Respondents noted that this option would have the least impact on local businesses (*Least damage to city*) and the travelling public (*It's a small zone which would not impact as many people*; *Minimal impact to traffic transiting through the city to get from point A to point B*).

A number of people noted that the area was logical and well-defined and should enable non-compliant drivers to re-route around the area with minimal disruption (*Small area, easy to navigate around the LEZ if your vehicle is not compliant).* Others noted that starting with a smaller boundary could be a stepping stone to the LEZ expanding over time (*First step towards larger roll out*).

A significant volume of respondents stated that they saw no advantages of this option, either because they were against the concept of a LEZ itself (*Aberdeen does not need a low emission zone*) or they felt that the scope of the option was too limited to make much of a difference (*Seems pointless if it's so small*). Again, concerns were raised about the LEZ pushing the problem elsewhere (*None. It will cause major congestion elsewhere, leading to red zones appearing elsewhere in the city, so in effect achieving nothing but stress and inconvenience to commuters, shoppers etc.).*

Option 1A - Disadvantages

Many respondents saw no disadvantages with this option. Conversely, many felt that there were no advantages, either because they were opposed to the concept of a LEZ anyway, or felt that this option is too limited in scope in that it doesn't encompass all problem areas (*it doesn't include Market St from Guild St to Victoria Bridge which is heavily polluted*) so will have minimal impact (*Too small an area to make a difference*).

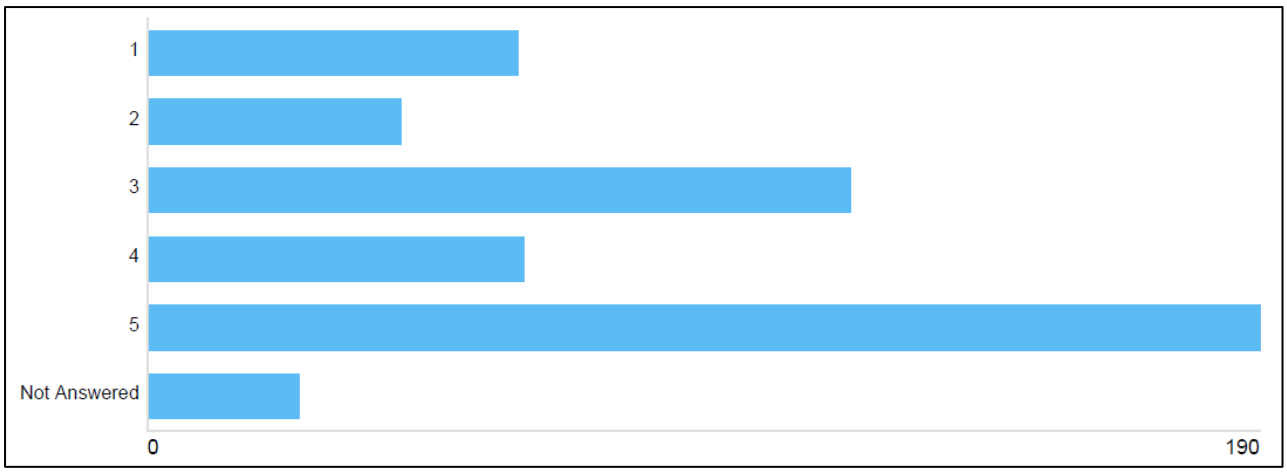
A number of comments were received on the subject of the economy, particularly concerns that a LEZ would discourage people from visiting the city centre, further contributing to its decline (*City centre trading is already struggling to survive. Anything that reduces the people coming into town would only exacerbate the problem*) and negatively impacting on local businesses (*The businesses in the centre would suffer with a lack of footfall*). Some respondents also thought that restrictions would also drive people away from living in the city centre (*Residents will move out of penalty zones*).

Again, many comments were received that such restrictions would simply drive traffic and emissions elsewhere (*Potentially circuitous routes will end up being used to avoid the zone and may shift the pollution risk to other areas which are more residential / include school areas*), potentially increasing congestion in other areas and perhaps even increasing total emissions overall (*It would create more emissions overall from slower longer journeys*). Concerned were raised about specific areas/streets becoming 'rat runs', particularly residential areas and streets with schools on them.

Again, concerns were raised that it would be the most vulnerable members of society most disadvantaged by proposals, particularly the disabled and those unable to afford a newer vehicle (*It will prevent people being able to carry out their jobs if they own non compliant vehicles. It targets the less wealthy worker*; *So the roads will be available only for those who can afford brand new cars*). Many were also concerned about residential streets being included (*This contains residential streets. Dee place is a residential street which should not be cut off from the outside world*) and / or took offence at the thought of having their movements restricted (*Thought it was meant to be a free country*). A number of specific areas were mentioned which people felt their accessibility to would be compromised, particularly car parks.

The inclusion of Denburn Road in the LEZ area was also considered a disadvantage by many given that it offers a potential opportunity to avoid the main city centre shopping area (*The downside is that the inclusion of the Denburn Road creates an obstacle for drivers seeking to avoid entering an LEZ*) and is viewed as a *major thoroughfare.*

Option 1A - How do you think this option will impact on you either individually or as a business, on a scale of 1-5 (where 1 means a very positive impact and 5 a very negative impact?)



50.2% (combining those selecting options 4 and 5) of respondents believed this would have a negative impact, with 21.1% (options 1 and 2) believing this would have a positive impact. 23.7% selected option 3, suggesting they anticipated no impacts or a neutral impact.

In terms of those suggesting this option would have negative impacts, a number of these related to personal difficulties or inconveniences likely to arise, such as having to purchase a new car (*i am a low paid keyworker with a 2003 car which i cannot afford to replace*), problems accessing places they want or need to be (*I would no longer be able to get to union square*; *This option limits my access to my place of work*), including the need to take longer circuitous routes (*Will have to have large lengthy diversion to access family*). Concerns about the impacts on disabled travellers arose again (*As a disabled pensioner who relies on my car to reach shopping in town with an older car it would appear if I move from my home in the Bridge of Don I will have to pay*).

Similar to responses to the other questions, impact on businesses and the city centre was cited as a key issue (*A reduction in traffic will impact my business because my business is located inside the LEZ*) with many respondents stated that proposals would drive them to shop and spend time elsewhere (*I will no longer use Aberdeen for shopping)* and/or not visit the city centre (*People will continue to shop on line and this could increase if people cannot use their own cars, being footfall and revenue spent in the shops in the town will fall further*). Again, concern was raised that traffic and emissions would simply be displaced elsewhere.

Those anticipating a positive impact cited less pollution and less city centre traffic as key reasons for their answer (*Better air quality is great for me personally, and I work on Union Street, where often the choice is to open the window for cooler air - but bad smells, pollution and noise - or keep the window closed and deal with stuffy air*), while many stated that they would be more likely to visit the city centre more often as a result (*I will be more likely to visit the city centre and spend time on the streets visiting shops, cafes etc*) or believed that the proposals would improve the city centre (*Make going into city centre a nice experience*).

In terms of those who stated this would have a neutral impact, this was largely because respondents' vehicles would already be compliant (*Should not impact me as I believe my cars are above the minimum standards required to enter LEZ*); they don't tend to travel through the area by car anyway (I *rarely visit this area of the city centre*) or could see reasonable alternatives (*It won't make much difference, I would just have to avoid the Denburn).*

Option 1B – Advantages

Given the similarities of this option to Option 1A, many respondents merely referred to their comments on this option.

Again, many saw no benefits to this option, either because they oppose the concept of a LEZ or they felt that this option is too limited in scope (*pointless because it doesn't fully address the issue*).

The main benefit raised by respondents was that this option, unlike Option 1A, allows access along the Denburn corridor, keeping a city centre through-route open for all vehicles and reducing potential impacts elsewhere (*This allows cars that are not compliant to still have through access. Not having Denburn and guild St included means that surrounding roads that aren't in the LEZ and can't handle larger amounts of traffic will not be negatively impacted by the introduction of the LEZ*; *Leaving a north-south corridor close to the city centre open seems a highly practical option which could reduce the stress on many motorists who do not wish to engage in great detours around the city centre in order to head north or south. It links very well with South College Street, which is a route many people coming into Aberdeen from the south may wish to take*). There is a sense that this improves accessibility to key destinations, such as Union Square and the railway station, compared to Option 1A.

Respondents also noted that it was a clear and logical area (*Relatively easily demarcated, less chance of confusion*), while some welcomed the fact that it was a small zone that could still have a big impact om emissions, while reducing negative impacts on businesses, or which could act as a stepping stone to development of a larger zone in the future (*Although this option only covers a limited area it could form a core LEZ which will have scope for expansion into adjacent areas at a later date*). Again, respondents noted that this was likely to be the easiest option to implement but could still bring benefits.

Option 1B – Disadvantages

Given the similarities of this option to Option 1A, many respondents merely referred to their comments on this option.

Similar to Option 1A many respondents saw this option as too limited to have any real impact (*too small an area to make a difference*) and noted that key exceedance locations were not covered by this option (*Market street was recorded to have one of the highest levels of air pollution in the city. I think that taking these roads out of zone would mean no changes to the air quality over this whole area*). In contrast to some of the comments in the previous section welcoming the exclusion of Denburn Road, some respondents to this question queried the impact of this or suggested this undermined the concept of a LEZ (*Whats the point in having a major road polluting through the centre of a low emission zone; Allowing non-compliant vehicles to use denburn road and guild street would undermine the who intent behind introducing a low emission zone. Air pollution in these areas affects union street, and would continue to damage the health of those who live and work there. This is an unacceptable option in my opinion*). There was also a concern that this would make Denburn Road and Guild Street much busier. Similar to the responses to previous questions, other potential disadvantages noted included: impact on businesses and the city centre; potential for traffic and emissions to be displaced elsewhere, to more sensitive areas; impacts on the disabled and less affluent; and personal inconvenience, in terms of it being harder to access a particular destination.

Option 1B - How do you think this option will impact on you either individually or as a business, on a scale of 1-5 (where 1 means a very positive impact and 5 a very negative impact?)