

Response ID ANON-VVU6-24YV-C

Submitted to **Aberdeen Low Emission Zone Options**

Submitted on **2020-09-24 15:36:01**

Introduction

1 Are you responding to this consultation as an individual or on behalf of an organisation?

Organisation

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

Yes

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

Yes

Please expand upon your answer in the box below:

Low Emission Zones are one of the most effective ways to protect vulnerable people from dirty air and exist in over 200 cities across Europe. With road traffic causing toxic air pollution in Aberdeen city centre, we need a LEZ to restrict the most polluting vehicles to protect health.

4 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?

Strongly agree

Please expand upon your answer in the box below:

EU limit values have been breached in Aberdeen since 2010. There have been very few tangible measures introduced to actually reduce pollution. A LEZ is not just necessary; it is long overdue.

Organisation Details

5 What is your organisation?

Organisation:

Friends of the Earth Scotland

Option 1A – Union Street Area

11 In your view, what are the main advantages of this option?

Option Advantages:

This zone covers some of the historic pollution hot spots in the city centre.

12 In your view, what are the main disadvantages of this option?

Option 1A disadvantages:

This proposal is very small. Non-compliant vehicles are likely to travel round the perimeter of the zone - rather than changing vehicle or mode - leading to air pollution issues surrounding this zone.

Such a small zone would be a huge mistake, a big missed opportunity for Aberdeen to make a city centre that is attractive, safe, and protects health.

13 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?)

5

Please expand upon your answer in the box below:

Option 1B - Union Street Area, excluding Denburn Road and Guild Street

14 In your view, what are the main advantages of this option?

Option 1B advantages:

15 In your view, what are the main disadvantages of this option?

Option 1B disadvantages:

The exclusion of Denburn Road and Guild Street doesn't make sense. To be effective, the zone should cover a large area, and be clear to all road users. These exclusions would undermine the zone's effectiveness, and would lead to higher traffic of non-compliant vehicles around the edge of the zone.

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

5

Please expand upon your answer in the box below:

Option 2A - Union Street & George Street Area

17 In your view, what are the main advantages of this option?

Option 2A Advantages:

This option is larger than Option 1 variants, and would therefore protect more people's health when they are spending time in the city centre.

18 In your view, what are the main disadvantages of this option?

Option 2A Disadvantages:

However, historic hot spots for pollution are not included in the road. West North Street and King Street in particular have had persistent air quality issues. Aberdeen's Low Emission Zone must, at least include areas where we know air pollution is worst in the city.

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

3

Please expand upon your answer in the box below:

Option 2B - Union Street & George Street Area, excluding Denburn Road and Guild Street

20 In your view, what are the main advantages of this option?

Option 2B Advantages:

21 In your view, what are the main disadvantages of this option?

Option 2B Disadvantages:

Denburn Road and Guild Street should not be excluded from any option.

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

Not Answered

Please expand upon your answer in the box below:

Option 3A - City Centre Masterplan East

23 In your view what are the advantages of this option?

Option 3A Advantages:

Option 3A is certainly better than Options 1 and 2. It is a larger zone, large enough to initiate modal shift within the city centre. It covers many of the air pollution hot spots, the locations of illegal exceedances.

24 In your view, what are the disadvantages of this option?

Option 3A Disadvantages:

The south of the city centre is not well served by the Option 3 for a Low Emission Zone. The areas south of the train station should be included in the zone, to ensure the whole city centre benefits.

This is also true for the area to the North-West of Woolmanhill. Option 3 covers a larger area than Options 1 and 2, but leaves large sections of the city without the protection a Low Emission Zone would provide. It is an incomplete zone.

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

Not Answered

Please expand upon your answer in the box below:

Option 3B - City Centre Masterplan East, excluding Denburn Road and Guild Street

26 In your view what are the main advantages of this option?

Option 3B Disadvantages:

27 In your view, what are the main disadvantages of this option?

Option 3B Disadvantages:

The exclusion of Denburn Road and Guild Street doesn't make sense. To be effective, the zone should cover a large area, and be clear to all road users. These exclusions would undermine the zone's effectiveness, and would lead to higher traffic of non-compliant vehicles around the edge of the zone. Option 3 does not serve the south of the city centre, and the exclusion suggested in Option 3B confounds this problem.

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

Not Answered

Please expand upon your answer in the box below:

Option 4A - City Centre Masterplan Area

29 In your view, what are the main advantages of this option?

Option 4A Advantages:

Option 4A is the best option for Aberdeen's Low Emission Zone.

It covers a large area, which will lead to air quality improvements across much of the city centre, protecting the health of residents, workers and visitors.

The larger area will ensure non-compliant vehicles are less likely to merely travel round the outside of the zone. It is more likely to lead to fleet turnover, and modal shift.

There is a great opportunity for Aberdeen City Council to introduce this zone, as outlined in Option 4A, alongside a range of other travel measures, such as active travel infrastructure, pavement widening, bus gates, and pedestrianisation.

30 In your view, what are the main disadvantages of this option?

Option 4B Disadvantages:

The North West of the city centre is not served by Option 4, or any of the Options for Aberdeen's Low Emission Zone.

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

2

Please expand upon your answer in the box below:

Option 4B - City Centre Masterplan Area, excluding Denburn Road

32 In your view, what are the main advantages of this option?

Option 4B Advantages:

33 In your view, what are the main disadvantages of this option?

Option 4B Disadvantages:

The exclusion of Denburn Road and Guild Street doesn't make sense. To be effective, the zone should cover a large area, and be clear to all road users. These exclusions would undermine the zone's effectiveness, and would lead to higher traffic of non-compliant vehicles around the edge of the zone.

Particularly with Option 4, the largest of the LEZ proposals, this exclusion would damage the zone's effectiveness. Non-compliant vehicles could pollute in the very centre of the zone.

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

Not Answered

Please expand upon your answer in the box below:

Options Summary

35 Having considered all the LEZ options and their potential impacts, please rank them in order of your preference (where 1 is your most preferred option and 8 your least preferred option).

ranking - Option 1A:

7

ranking - Option 1B:

8

ranking - Option 2A:

5

ranking - Option 2B:

6

ranking - Option 3A:

2

ranking - Option 3B:

4

ranking - Option 4A:

1

ranking - Option 4B:

3

Exemptions and Grace Periods

36 What do you think is an appropriate grace period (during which fines for entering the LEZ will not be issued) for those living within the LEZ area?

1 year

37 What do you think is an appropriate grace period (during which fines for entering the LEZ will not be issued) for non-residents (those not living within the LEZ area)?

1 year

Conclusion

38 If you have any other comments to make in relation to Aberdeen's proposed LEZ please do so in the box below.

Further Comments:

The delay announced recently by the Scottish Government, with LEZs now not beginning until 2022, was very disappointing. By that time, it will have been 5 years since the Scottish Government first announced the zones, and 12 years since Scottish cities first started breaching legal air quality limits.

Aberden's Low Emission Zone must take account of these delays, and introduce a range of sustainable transport measures alongside a large zone which excludes all vehicle types.

Scotland needs to rapidly decarbonise its transport sector, and the LEZ is a key tool for helping to achieve this. If the opportunity is missed and a small zone is introduced that achieves very little, future interventions will become more difficult for city council administrations.