

Deputation Request for item 9.1 Air Quality Progress

The Clerk

Aberdeen City Council
Marischal College
Broad Street
Aberdeen AB10 1AB

Dear Steph,

Re: Deputation Request on Air Pollution Reduction Measures in Aberdeen

I am writing to formally request a deputation at the upcoming Sept 3rd, 2024 Net Zero, Environment and Transport Committee meeting. My request relates to the report titled "2024 Air Quality Annual Progress Report (APR) for Aberdeen City Council" (June 2024) as published by Aberdeen City Council's Protective Services.

Purpose of Deputation

The purpose of my deputation is to seek clarification on the necessity and appropriateness of the air pollution reduction measures currently being implemented in Aberdeen, particularly in light of the findings presented in the 2024 Air Quality Annual Progress Report. The report highlights that there were no exceedances of key air quality objectives for nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) across the city in 2023. This marks a significant improvement in air quality and raises questions about the need for further stringent measures.

Key Points of Concern

1. **Misalignment with Air Quality Statistics:** The report clearly indicates that air quality in Aberdeen has improved to the extent that certain Air Quality Management Areas (AQMAs) are being considered for revocation or amendment. Despite this, significant air pollution reduction measures, such as the enforcement of the Low Emission Zone (LEZ) starting in June 2024, are being rolled out. It is unclear why these measures are necessary when the air quality objectives are already being met.
2. **Voluntary Commitment to the Covenant of Mayors:** In 2008, Aberdeen City Council voluntarily signed up to the Covenant of Mayors, an initiative that aligns with the EU's climate and energy targets. This political commitment, as outlined in the Covenant of Mayors report by the Corporate Director for Strategic Leadership, was made independently of any Scottish Government directives. The Council committed to developing a Sustainable Energy Action Plan (SEAP) to achieve a 20% reduction in CO₂ emissions by 2020. However, this decision was voluntary and part of a broader EU agenda, rather than a direct response to local environmental conditions.
3. **UK's Departure from the EU:** Since the United Kingdom, including Scotland, has left the European Union, the continued alignment of Aberdeen City Council's policies with EU directives, such as those influenced by the

Covenant of Mayors, is questionable. Given that we are no longer bound by EU regulations, it is worth asking why Aberdeen continues to adhere to a voluntary EU initiative that may not be relevant to the current needs of the city and its residents. This raises serious concerns about the rationale behind these decisions and whether they reflect the post-Brexit landscape in which local policies should be tailored to the specific needs of the UK and Scotland, rather than being driven by outdated EU commitments.

4. **Merger with Mayors Adapt Initiative:** The Covenant of Mayors later merged with the Mayors Adapt initiative, creating a unified approach to climate change mitigation and adaptation. While this merger aims to streamline efforts and strengthen local action plans, it is important to note that participation in this initiative is still voluntary and not mandated by the Scottish Government. The Council's decisions to implement measures like the LEZ seem more influenced by this EU-aligned commitment than by local air quality data.
5. **Public Opposition to Climate-Based Travel Restrictions:** Surveys conducted in 2023 and 2024 overwhelmingly showed that the majority of Aberdeen's residents opposed the climate-based travel changes and restrictions being proposed or implemented in the city. A poll reported by Aberdeen Live in August 2023 indicated that 90% of respondents opposed the LEZ plans for Aberdeen. Similarly, a more recent survey reported by the Press and Journal in January 2024 revealed that the majority of respondents were against the LEZ implementation in the city centre. This opposition indicates that the measures do not have the support of the public, yet they continue to be pursued under the pretext of environmental necessity. The Covenant of Mayors is a voluntary political movement and should not be mistaken as a binding obligation from higher government authorities.
6. **Challenges to the Necessity of LEZ Enforcement:** In a letter dated 11th April 2024, Liam Kerr MSP (Conservative Party, North East Scotland Region) rejected the Council's claim that the LEZ enforcement is a compulsory order from the Scottish Government. Mr. Kerr clarified that the decision to introduce the LEZ in Aberdeen was not mandated by the Scottish Parliament but was a voluntary application by the City Council. This assertion raises further doubts about the appropriateness of these measures, especially in light of the improved air quality statistics and the public's opposition to such restrictions.
7. **Impact on Public and Economic Activities:** The implementation of these measures, particularly the LEZ, has been met with scepticism and criticism from the public and business communities, as acknowledged in the report. The continued enforcement of these measures could have adverse effects on local businesses and residents, especially when the air quality data suggests that such measures may not be as crucial as previously thought.
8. **Resource Considerations and Strategic Leadership:** According to the Covenant of Mayors report, there are significant resource implications associated with the development and implementation of SEAPs, which require strong strategic leadership. Given the challenges in resource allocation and the local opposition to these measures, it is critical that Aberdeen City Council reconsiders its commitment to these initiatives, ensuring that they are both financially viable and aligned with local needs.
9. **Request for Re-evaluation:** Given the positive air quality trends, the public's opposition to climate-based travel changes, and the clarification from both the Covenant of Mayors and the Scottish Government, I respectfully request that

the Council re-evaluate the necessity of these ongoing measures. A more data-driven and locally-focused approach may be required to ensure that public resources are being used efficiently and that the measures align with the current air quality realities and the wishes of the people of Aberdeen.

Questions for the Council

- Why does Aberdeen City Council continue to align with EU directives, such as those under the Covenant of Mayors, when the UK and Scotland are no longer part of the EU? Shouldn't local policies reflect the current post-Brexit environment and the specific needs of our community?
- Given the improved air quality in Aberdeen, as evidenced by the 2024 Air Quality Annual Progress Report, what is the justification for continuing with stringent air pollution measures like the LEZ?
- How does the Council reconcile the implementation of these measures with the overwhelming public opposition, as indicated by recent surveys?
- What are the specific benefits that Aberdeen expects to achieve by maintaining its commitment to the Covenant of Mayors, especially in light of the UK's departure from the EU?
- Is the Council willing to reconsider or amend these measures if they are found to be more aligned with a political agenda rather than the actual environmental and economic needs of Aberdeen?

Action Requested

I request that the Committee considers the following actions:

- Reassess the need for continued enforcement of the LEZ and other related measures in light of the recent air quality data.
- Reconsider the commitment to the Covenant of Mayors and its influence on local policy, particularly if it does not align with the specific needs and desires of Aberdeen's residents.
- Explore alternative strategies that could maintain or further improve air quality without imposing unnecessary restrictions or costs on the public and businesses.
- Provide a clear explanation to the residents of Aberdeen regarding the rationale behind these measures, especially when the air quality is reported to be within acceptable limits and considering the confirmation that the LEZ was not a Scottish Government mandate.

Thank you for considering my request. I look forward to the opportunity to present this deputation in person and engage in further discussion on this important matter.

Yours sincerely,

Elizabeth Leslie