

SUMMARY TABLE	
Client	Aberdeen City Council
Project	Aberdeen Low Emission Zone
Title of Document	Notes on Stakeholder Workshops
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### 1. INTRODUCTION

- 1.1.1 SYSTRA has been commissioned by Aberdeen City Council (ACC) to provide support with stakeholder engagement activities for its Low Emission Zone (LEZ) proposals, which has primarily involved engaging virtually with a range of key stakeholder groups. In parallel to the stakeholder consultation, ACC is leading an online public consultation exercise.
- 1.1.2 This note provides a summary of the activities undertaken and the key questions and themes emerging from the stakeholder engagement.
- 1.1.3 SYSTRA organised seven virtual stakeholder workshops in October 2020, held using Microsoft Teams. A summary of the workshop groups and number of attendees is provided in Table 1.1.

**Table 1.1 : Aberdeen LEZ Stakeholder Workshops – October 2020**

Workshop Group	Date	Number of Attendees
Taxi & Private Hire Consultation Group	07/10/2020	11
Community Council	07/10/2020	5
Business Community (1)	13/10/2020	0
Business Community (2)	13/10/2020	0
Freight & Aberdeen Harbour	14/10/2020	6
Environmental, Health & Equalities Groups	15/10/2020	5
Bus & Coach Operators	21/10/2020	7
<b>Total No. of Stakeholders Consulted:</b>		<b>34</b>

- 1.1.4 As shown in the summary table, no stakeholders from the business community attended either workshop, despite several attempts to contact business groups and their members. This is perhaps understandable given the current impact the Covid-19 pandemic is having on businesses. The Federation of Small Businesses (FSB) circulated the invite to their members and did offer to attend themselves, but with no other attendees the session was cancelled and the FSB provided feedback through the online consultation survey. It should

be noted that there will be further opportunities for businesses in Aberdeen to take part in engagement workshops as the plans for Aberdeen's LEZ develop.

- 1.1.5 At all stakeholder workshops, SYSTRA gave a 20-minute presentation on current air quality issues in Aberdeen, the problems that a LEZ will try to address and the emerging LEZ options.

## **2. NOTES FROM THE STAKEHOLDER WORKSHOPS**

### **2.1 Taxi and Private Hire Consultation Group 07/10/20**

- 2.1.1 SYSTRA presented to 11 attendees including representatives from the taxi trade, taxi licensing, Police Scotland, council fleet and enforcement officers and elected council members.

- 2.1.2 After the presentation, the group chair opened for questions and comments, as summarised below.

- A general point was made that a taxi can be no older than 10 years old in order to hold a taxi license in the city. This would mean from 2025, all taxis will be registered vehicles from 2015 onwards, the introduction date of the Euro 6 diesel cars.
- Will the LEZ be delivered with complementary measures such as bus/taxi/cycle gates or traffic calming measures?
- Will there be exemptions for events such as, for example, Armed Forces Day on Union Street?
- Concern was expressed that older people are likely to have older vehicles and some of the larger options cover residential areas making it difficult to escape punishment for living in the LEZ area.
- Concern was expressed that introducing and/or expanding a LEZ area will push air quality issues and other problems (e.g. traffic congestion) elsewhere.
- With city centre traffic volumes changing in the last few months, how is the LEZ development addressing changes from Covid-19?
- What is the penalty charge and could those that use LEZ area most get passes (e.g. taxis)?
- Will plant traffic (e.g. diggers/tractors/road maintenance) be exempt as specialist vehicles?

### **2.2 Community Council Meeting 07/10/20**

- 2.2.1 A joint session was organised and was attended by five representatives from George Street, Rosemount and Mile-end and Castlehill & Pittodrie Community Councils.

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

- The community groups were supportive of a LEZ in principle with a specific point made that they were pleased to be engaged with at this stage and welcomed being involved in some part of shaping the LEZ. One representative wanted to thank the Council for involving them.
- After viewing the proposed option areas, 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.
- Have emissions from the harbour been taken into account in the analysis?

- Are there exceptions for mobility buses and/or blue disability badges.
- Why is Option 2 needed – including George Street and surrounding areas – what is the benefit as there are no additional exceedances in this area?
- Concern was expressed of the impact on equality from the introduction of the LEZ, will it adversely impact those less well off?

## **2.3 Freight Meeting 14/10/20**

2.3.1 The session was attended by six members of the freight & road haulage community and Aberdeen Harbour.

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

- A general view was expressed that a LEZ is coming and hauliers will have to deal with it accordingly. The biggest impact on hauliers (and all drivers) would be Options 3 and 4, with the inclusion of Market Street and the Eastern Route and Aberdeen Harbour access.
- 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. There followed a discussion that by 2022, when the LEZ will (likely) be declared, 7 years takes you back to 2015 and the introduction of Euro VI standard. It is therefore likely that the vast majority of HGVs on the network will be compliant by 2022 and certainly the case a few years thereafter. Any non-compliant vehicles would likely then be strategically withdrawn from LEZ areas and re-deployed (if needed) to non LEZ areas.
- Have emissions from the harbour been taken into account in the analysis?
- Aberdeen Harbour is supportive of the LEZ measures and explained they are also progressing their own initiatives to improve air quality inside the harbour premises. They noted that it will be important to maintain access but echoed the view that 2022 should allow time for the majority of vehicles to be compliant.
- Concern was raised that if all vehicles are compliant (as will happen eventually), there might still be exceedances. Would the LEZ become ineffectual and would additional measures need to be introduced?

## **2.4 Environmental, Health and Equalities Groups 15/10/20**

2.4.1 There were six attendees at this session from Friends of the Earth, Aberdeen Cycle Forum, Asthma UK and British Lung Foundation Partnership, plus one freight operator (missed freight meeting).

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

- All representatives were supportive of a LEZ in Aberdeen with FoE stating a preference for Option 4A (as recorded in online survey).
- Why is the north west area of the city centre not included (e.g. Rosemount and Gilcomston)?
- What further modelling is being undertaken, is this the same as other cities and if not, is Aberdeen behind?
- Concerns were raised that if Skene Square is not included then non-compliant vehicles will be drawn to this route..
- Option 2, expanding to include the George Street area, does not include any further exceedances, why is it an option?

- In addition to Option 2 not including any further exceedances, it was noted that George Street area has high volume of social housing. What would be in place to support people living here? This led to wider discussion about grace periods and the balance of enforcing a LEZ and not adversely impacting those unable to adapt.
- Why is there no mention of Particulates in the presentation?
- What other engagement has happened to date and are there plans for further engagement?
- How will the LEZ be enforced?
- From the freight operator, it was noted that the AWPR is the main route that they utilise from Aberdeenshire to locations throughout the country. It was also noted that their fleet is predominately Euro VI so at the moment there are no major concerns about LEZ enforcement in 2022 (or thereafter with grace periods).

## **2.5 Bus Operators 21/10/20**

2.5.1 The meeting was attended by representatives from First, Stagecoach and CPT. The invite was extended to Bains Coaches (who were unable to attend) and to the wider coach industry (through CPT).

2.5.2 A key point made by CPT and echoed by all operators who are utilising the Scottish Government Covid-19 support grants that run until mid-January. The grants cover the cost of running a certain level of service but the operators cannot make profit. It is very uncertain what the future holds. Additional funding will help cover costs thereafter but it cannot last indefinitely. In addition, coach operators (i.e. non-timetabled) are not receiving any financial help and many vehicles bought recently (Euro VI complaint) are on finance and will likely be repossessed if no help materialises/customers do not return. The issue is very live and clarity is needed for all. For all bus and coach operators, investment cannot currently be made and therefore fleet improvements have stopped. At the moment, operators will not have the ability to improve fleets to ensure all buses LEZ complaint by 2022. There must be a collective understanding (from Council/Transport Scotland/Ministers) of the difficulties faced by the industry and while supportive of a LEZ in principle, operators should not be forced to take action they simply cannot afford at present.

2.5.3 There were also a number of comments and questions, as summarised below.

- What will term “resident” mean when defining grace periods? Could it be used for a business with premises outside the LEZ area but which serves it regularly and/or provides a valuable service for its residents?
- Glasgow has/had a stepped approach to introducing 100% compliance, can this be done in Aberdeen?
- Concern was expressed that a number of the proposed areas skirt current congested locations on the network and it must be ensured that a LEZ does not make traffic conditions worse for buses. Is this being taken into account?

## **2.6 Key themes from engagement**

2.6.1 At each workshop session, several questions and themes were consistently discussed and similar points were made:

- No stakeholder expressed views against the LEZ. Some stakeholders made the point of expressing support for a LEZ while others stated they were accepting that a LEZ was to be introduced; the LEZ option development process and eight options seemed reasonable at this stage.

- The LEZ should not create problems elsewhere in the city. Whether this is new air quality exceedances or increased congestion. If required, the LEZ should be delivered with complementary measures to ensure this does not happen.
- Grace periods, particularly for residents of the LEZ and those on a lower income/income support, should be as long as possible.
- Exemptions are needed for certain vehicles (mobility vehicles, vintage vehicles etc.)
- Bus and coach operators are in a very difficult financial position due to the impact of Covid-19 and will not be able to ensure all vehicles meet LEZ standards if current level of income continues. There is a need for a collective understanding of the difficulties faced by the industry when deciding on the date and impact of the implementation and enforcement of the LEZ.
- The majority of HGVs will be compliant by 2022, 7/8 year cycle on vehicles (i.e. based on 7 years from 2015 (Euro VI introduction)).