

Integrated Impact Assessment

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Consumer Duty](#)
- Section 5 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- Section 7 [Environmental impacts](#)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

1. About the Policy

1.1 Title
City Centre Transport Improvements
1.2 What does this policy seek to achieve?
The policy seeks to respond to an instruction from the Council to look at the feasibility and impacts of amending or removing certain traffic restrictions in the city centre, and to recommend a preferred way forward.
1.3 Is this a strategic programme/proposal/decision?
Yes – the project forms a core element of the Aberdeen City Centre Masterplan.
1.4 Is this a new or existing policy?
Existing – the measures are currently in place and officers have been instructed to consider adjustments.
1.5 Is this report going to a committee?
Yes.
1.6 Committee name and date:
Council – 2 nd October 2024.
1.7 Report no and / or Budget proposal number and / or Business Case reference number:
CR&E/24/287
1.8 Function and cluster:
Strategic Place Planning, City Regeneration and Environment

Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children’s rights and our socio-economic duty. This is our Public Sector Equality Duty. The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [protected characteristics](#).

2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	Negative			Neutral	Positive
	High	Medium	Low		
Age			X		X
Disability			X		X
Gender Reassignment					X
Marriage and Civil Partnership				X	
Pregnancy and Maternity				X	
Race					X
Religion or Belief					X
Sex					X
Sexual Orientation					X

2.2 In what way will the policy impact people with these protected characteristics?

Age and Disability - Responses to the consultation on the Experimental Traffic Regulation Order (ETRO) suggest that older people and those with certain disabilities are particularly concerned and anxious about the traffic management changes in the city centre, and their ability to understand and navigate these. However, with these measures in place for a year now, any amendments risk causing further confusion. Concerns were also raised about increased walking/wheeling distances to/from shops and services resulting from the new traffic management measures. However, access to all city centre car parks and on-street parking bays (including blue badge spaces) has been maintained for all users, albeit some may now have to be accessed via different routes than people have traditionally used, potentially adding minimal time and distance increases to some journeys. Ultimately, though, it is likely that perceptions of negative impacts are worse than the reality in this regard, as analysis of car park accessibility shows that the bus gates have necessitated only modest increases in distances to car parks (less than half a mile in all the examples considered, with most journeys experiencing no or negligible change) and no real impact on car journey times. An extensive media campaign including the development of maps was undertaken at the time to explain the changes and show how access to all car parks was maintained.

Less traffic in the city centre core should make it easier for people to move around when walking, wheeling, cycling – this should have particular benefits for elderly people and those with mobility impairments who require more time to cross roads safely, for example, and for children and young people, who are more likely to be reliant on active travel when moving around the city centre.

Less traffic should also result in fewer harmful pollutants emitted in the city centre (an area of high population exposure), with particular benefits for children (including the unborn), elderly people and those with existing cardio-pulmonary conditions, who are known to suffer disproportionately from the impacts of poor air quality.

Measures to improve bus journey times to and through the city centre will have particular benefits for the 30% of the population that do not have access to a car, children and young people, the over 60s and those with certain disabilities who are more likely to use public transport than drive, as a result of public transport concession schemes offering free bus travel to these groups and/or not being able to drive.

Sex – Women typically travel by bus more than men so will experience greater benefits from measures that improve bus journey times and journey time reliability. Women cycle less than men and have less favourable views on cycle safety, therefore any measures to improve the cycling environment could benefit women in particular, encouraging more active and healthy lifestyles. Lone females are potentially more vulnerable to harassment and assault, therefore any measures to improve natural surveillance of public spaces by encouraging more pedestrian and cyclist activity throughout the day will have positive impacts.

Gender Reassignment, Race, Religion or Belief, Sexual Orientation – people with these protected characteristics may be more vulnerable to harassment or assault in public spaces, especially at night, therefore any measures to improve natural surveillance of such spaces by encouraging more pedestrian and cycle activity to the area throughout the day will have positive impacts.

Marriage and Civil Partnership, Pregnancy and Maternity – no impacts have been identified for these groups.

2.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

Responses received during the 6-month consultation period on the Experimental Traffic Regulation Order (ETRO) provided an indication of the level of satisfaction of members of the public, businesses and stakeholders with the measures and what the main concerns are, and has encouraged the Council to look at the impacts and feasibility of removing some restrictions.

[Impacts of Air Pollution Across the Life Course – Evidence Highlight Note](#) – summarises the available evidence of the impacts of air pollution on health, and the disproportionate impact on vulnerable groups.

[Scottish Transport Statistics 2023](#) – provides data on passenger journeys on local bus services, including number and percentage of concessionary fare passengers.

[CIVITAS Policy Note – Gender Equality and Mobility: Mind the Gap!](#) – this report provides evidence on how different genders use transport, with women identified as using transport for more short and complex tasks (they will generally do the school run, shops and work etc, whereas men often just travel to work) and so are more likely to use public transport to achieve that.

[Comprehensive Travel Study](#) – includes data showing that women use public transport more than men.

[Walking and Cycling Index 2023](#) – suggests women currently cycle less than men in Aberdeen and have less favourable view of cycle safety.

What consultation and engagement has been undertaken with officers and partner organisations?

The City Centre Masterplan and its individual elements have been developed across multiple teams and with support from external agencies working on behalf of the Council (Hub). Transport Strategy, Traffic

Management and Road Safety, Roads Operations, City Growth and Communications have had key roles in terms of developing and delivering the current transport measures.

What consultation and engagement has been undertaken with people who may be impacted by this policy?

The Experimental Traffic Regulation Order (ETRO) was subject to a 6 month open public consultation process through the Consultation Hub, supported by stakeholder consultation / meetings with relevant bodies including the Disability Equity Partnership, cycling groups, public transport providers, taxi representatives, business representatives (through Aberdeen Inspired and other events) and emergency services. The statutory component of advertising the consultation, in accordance with legislation, was a press advertisement and street notices on the roads concerned, while it was additionally highlighted through news updates, media releases, and social media. The information was also available through paper copies, which could be arranged for viewing by way of visiting the Council offices. Likewise, if an alternative format was requested, the Traffic Management and Road Safety Team would have arranged for this. Additionally, officers would have undertaken in-person meetings if requested.

There were 500+ direct responses to the ETRO received during the consultation, coming from individuals and businesses, while further input was provided via Aberdeen Inspired and Aberdeen & Grampian Chamber of Commerce.

2.4 What mitigations can be put in place?

What can be done to reduce any negative impacts of this policy (if applicable)?

As highlighted in section 2.2, the majority of negative impacts are perceived rather than actual, primarily relating to the accessibility of the city centre. These have been, and will continue to be, addressed via positive messaging about the city centre still being fully accessible for all people, with information on how journeys can continue to be made without incurring a bus gate penalty.

Changes to signing and lining to make the restrictions clearer to members of the public have already been delivered.

With mitigations in place, what is the new overall rating of the negative impact(s)?

High	
Medium	
Low	
Negative Impact Removed	x

3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/pages/10.aspx)

3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
Low income – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.		X	
Low/ no wealth – those who have no savings for unexpected spend or provision for the future.		X	
Material deprivation – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.			X
Area deprivation – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.			X
Socio-economic background – social class, parents’ education, employment, income.			X

3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

Walking and cycling are low-cost forms of transport, available to most people who are physically able. Measures to make it easier and safer to walk and cycle to and through the city centre could therefore have positive impacts on those suffering from material deprivation – by making walking and cycling more accessible, such households may be more likely to be able to access social, cultural, recreational, employment and education opportunities.

Similarly, those suffering from material deprivation can be assumed to have limited access to private transport so may be more reliant on bus travel – 2022 Census outputs show that 30.7% of households in Aberdeen do not have access to a car or van and it can be assumed that these are generally less affluent households. Quicker and more reliable bus journey times could improve opportunities for such people to use the bus to access key facilities, such as healthcare, employment, education and training. Sustained journey time and reliability improvements could ultimately translate into cost savings for passengers.

Those living and working in the city centre could be said to be suffering area deprivation as a result of traffic congestion and associated noise and pollution. Measures to reduce traffic will therefore have positive impacts on those living and working in the city centre.

The objections received from the public to the Experimental Traffic Regulation Order (ETRO) expressed alarm at the impact the changes have on the viability of existing retail and hospitality provisions in the city centre, with particular concerns raised about employment in these trades which supports many low-income households.

The counter to the above is the measures work towards establishing a modern welcoming city centre that is vibrant and pleasant to negotiate by walking, wheeling and cycling, and where people want to

spend time, whether that be for shopping, visiting cafes / restaurants, or entertainment. Accordingly, the measures could support the retail and hospitality trades by consolidating and increasing footfall in the city centre, and where successful, also encourage new retail / hospitality investment.

3.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

[Transport and Inequality: An Evidence Review for the Department for Transport](#) – this concluded that: cost is a primary obstacle to the use of transport; transport is an important facilitator of social inclusion and wellbeing, which can affect economic and social outcomes, and therefore inequality; People who depend more on the bus network for work tend to be lower paid, live in more deprived areas, and are more likely to turn down jobs due to transport issues, than those on higher incomes, who tend to use cars and trains more often.

[Scotland's Census](#) – shows that 30.7% of households in Aberdeen do not have access to a car or van.

What consultation and engagement has been undertaken with officers and partner organisations?

As per section 2.3.

What consultation and engagement has been undertaken with people who may be impacted by this policy?

As per section 2.3.

3.4 What mitigations can be put in place?

What can be done to reduce any negative impacts of this policy (if applicable)?

N/A – no negative impacts identified.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

4: Consumer Impacts

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: [How to meet the consumer duty: guidance for public authorities](#)

4.1 What impact could this policy have on any of the below consumer groups?

	Negative	Neutral	Positive
Individuals	x		x
Small businesses	x		x

4.2 In what way will the policy impact people in these consumer groups?

The traffic management measures have resulted in a perception that the city centre is less accessible, with claims that people cannot access services, and small businesses are suffering as a result of this. Given that all areas of the city centre remain fully accessible to all, this is a perceived, rather than real, issue. The measures actually make the area more accessible to people using active travel and public

transport, with shorter bus journey times and a safer and more welcoming walking, wheeling and cycling environment.

4.3 What mitigations can be put in place?

What can be done to reduce any negative impacts of this policy (if applicable)?

As highlighted in section 2.2, the majority of negative impacts are perceived rather than actual, and primarily relate to the accessibility of the city centre. These have been, and will continue to be, addressed via positive messaging about the city centre still being fully accessible for all people, with information on how journeys can continue to be made without incurring a bus gate penalty.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

x

5: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of 'Articles'. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

5.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 2: Right to life		X	
Article 4: Prohibition of slavery and forced labour		X	
Article 5: Right to liberty and security		X	
Article 6: Right to a fair trial		X	
Article 7: No punishment without law		X	
Article 8: Right to respect for private and family life, home and correspondence		X	
Article 9: Freedom of thought, belief and religion		X	
Article 10: Freedom of expression		X	
Article 11: Freedom of assembly and association		X	
Article 12: Right to marry and start a family		X	
Article 14: Protection from discrimination in respect of these rights and freedoms		X	
Article 1 of Protocol 1: Right to peaceful enjoyment of your property		X	
Article 2 of Protocol 1: Right to education		X	
Article 3 of Protocol 1: Right to participate in free elections		X	

5.2 In what way will the policy impact Human Rights?

No impacts identified.

5.3 What mitigations can be put in place?

What can be done to reduce any negative impacts of this policy (if applicable)?	
N/A	
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains
	Yes – negative impact reduced
	Yes - negative impact removed

6: Children and Young People’s Rights Impacts

The United Nations Convention has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” e.g. care leavers aged 18-26 years old.

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

6.1 What impact could this policy have on the rights of Children and Young People?

	Negative	Neutral	Positive
PROVISION			
Article 2: non-discrimination		X	
Article 3: best interests of the child provision and protection		X	
Article 5: parental guidance and a child's evolving capacities		X	
Article 16: right to privacy		X	
Article 17: access to information from the media		X	
Article 18: parental responsibilities and state assistance		X	
Article 22: refugee children		X	
Article 23: children with a disability		X	
Article 24: health and health services		X	
Article 26: social security		X	
Article 27: adequate standard of living		X	
Article 28: right to education		X	
Article 29: goals of education		X	
Article 30: children from minority or indigenous groups		X	
Article 31: leisure, play and culture		X	
Article 39: recovery from trauma and reintegration		X	
Article 40: juvenile justice		X	
PROTECTION			
Article 6: life, survival and development		X	
Article 7: birth registration, name, nationality, care		X	
Article 8: protection and preservation of identity		X	
Article 9: Separation from parents		X	
Article 10: family reunification protection		X	
Article 11: abduction and non-return of children		X	
Article 15: freedom of association		X	
Article 19: protection from violence, abuse and neglect		X	
Article 20: children unable to live with their family		X	
Article 21: adoption		X	
Article 25: review of treatment in care		X	
Article 33: drug abuse		X	
Article 34: sexual exploitation		X	
Article 35: abduction, sale and trafficking		X	
Article 36: other forms of exploitation		X	
Article 37: inhumane treatment and detention		X	
Article 38: war and armed conflicts		X	
Article 32: child labour		X	

PARTICIPATION			
Article 12: respect for the views of the child		x	
Article 13: freedom of expression		x	
Article 14: freedom of thought, belief and religion		x	
Article 42: knowledge of rights		x	

6.2 In what way will the policy impact the rights of Children and Young People?

No impacts identified.

6.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?		
N/A		
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	
	Yes – negative impact reduced	
	Yes - negative impact removed	

7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the [biodiversity duty](#) and [sustainable procurement duty](#).

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
Council or City-wide carbon emissions			X
Active and sustainable travel			X
Facilities for local living			X
Resilience and adaptability to flooding and weather events		X	
Biodiversity improvement and wildlife/habitat connectivity		X	
Water consumption and drainage		X	
Pollution (air, water, noise, light and land contamination)			X
Impact on resource use and waste		X	
Sustainable procurement of goods and services		X	

7.2 In what way will the policy impact the environment?

Bus journey times and reliability to and through the city centre have improved as a result of the measures, potentially resulting in sustained modal shift from the car to the bus for some trips, and reduced emissions.

Restricting general traffic on key city centre streets makes these streets safer and more welcoming for people walking, wheeling and cycling, increasing the attractiveness of these modes of travel and encouraging greater usage. If modal shift from motorised to active and sustainable forms of transport is achieved, there would be a consequent reduction in emissions.

The measures may make driving to the city centre less attractive for some people (depending on their origins and destinations) as a result of journey time increases, again resulting in fewer emissions and less noise.

Air quality in the City Centre (an area of high population exposure) would be expected to improve as a result of modal shift and less traffic in the central core.

Improved walking, wheeling and cycling facilities in the city centre should allow city centre residents to access key shops and services on foot or by bike, helping people to 'live local'.

7.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

Data provided by bus operators has demonstrated improved journey times through the city centre and passenger growth on relevant services, following introduction of the measures.

What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.

Consultation on the ETRO was undertaken as per section 2.3. Liaison between public transport providers and active travel representatives is ongoing through a variety of fora. Traffic modelling has been used to understand the likely traffic impacts of changing or removing the measures.

7.4 What mitigations can be put in place?

What can be done to reduce any negative impacts of this policy (if applicable)?

No negative impacts identified.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

8: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?

An overarching aim of the bus priority measures is to reduce traffic congestion and lower air pollution.

Reducing traffic while ensuring our city centre is still accessible, through better public transport, is at the heart of the ambition to make Aberdeen's city centre a more attractive place in which to live, work and spend leisure time.

Giving priority to buses in the city centre improves traffic flow, reduces pollution and removes the barriers that deter people from making the switch to public transport.

More people taking the bus, more often, will lead to a better, more cost-effective service with greater frequency and reliability and reduced journey times.

There has already been growth in bus use (almost 10% by late 2023), particularly among younger, older people and students since the bus priority measures came into force.

The future changes to Union Street streetscape which is enabled by these traffic management changes will provide improved conditions for walking and wheeling within the city centre. It also improves active travel provisions by creating a segregated route for cyclists.

Does the policy relate to the Council's [Equality Outcomes](#)? If yes, how:

No.

Overall summary of changes made to the policy as a result of impact assessment.

There are no changes made to the policy as a result of this assessment, although a need for continuous positive messaging is identified.

Outline of how impact of policy will be monitored.

Engagement with key user groups and affected stakeholders will continue as part of the ongoing delivery of the City Centre Masterplan.

If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.

N/A

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