

Aberdeen Low Emission Zone (LEZ) – Summary of Objections Received and Resulting Actions

The formal objection period on Aberdeen's proposed Low Emission Zone (LEZ) ran from 1st November to 28th November 2021. A total of 79 submissions were received, mostly from members of the public, with only a handful of submissions received from businesses and other stakeholders. The below summarises the key themes to arise from the objection period and provides a response from ACC to each of these.

Issue 1: Concerns about the inclusion of Denburn Road within the LEZ given this is a dual carriageway under the city centre which has been designed for a high capacity of traffic

Response: Traffic and air quality modelling suggests that should Denburn Road not be included in the LEZ, this could increase traffic and worsen air pollution levels in the Hutcheon Street / Skene Square area, potentially pushing these areas beyond objective limits. Given the proximity to Skene Square School, this is not a desirable situation. **No amendments are therefore proposed.**

Issue 2: Concerns about the inclusion of Virginia Street and Market Street within the LEZ given that these are dual carriageways bordering the city centre, have been designed for a high capacity of traffic and provide access to key destinations such as Aberdeen Harbour

Response: A number of different LEZ options have been tested in the traffic and air quality models (including various permutations of the West North Street / Commerce Street / Virginia Street / Market Street corridor) and the option proposed strikes an appropriate balance between addressing air quality concerns and maintaining the accessibility of key areas of the city centre, including the Harbour. Removing Virginia Street and Market Street from the LEZ is predicted to result in continued exceedances of the nitrogen dioxide (NO₂) objective in these locations and could even make air quality worse here by encouraging more non-compliant vehicles to this corridor. **No amendments are therefore proposed.**

Issue 3: Concern over the Western boundary (Holburn Street, Albyn Lane, Union Grove) as this is a largely residential area and residents and local businesses will be impacted

Response: Holburn Street has been included within the LEZ as it is an area of regular NO₂ exceedance. Removing Holburn Street from the LEZ would potentially encourage an increase in non-compliant traffic on this corridor, worsening current air pollution. On the other hand, the inclusion of Albyn Lane (east of Albyn Grove) is not crucial for the LEZ as it is not a through route and simply provides access to residential and business properties. The inclusion of Albyn Lane was a consequence of extending the LEZ along Union Grove to capture the last decision point before non-compliant vehicles would be unable to re-route away from the LEZ. In practice and with careful signage, Albyn Lane and Union Grove could be excluded from the LEZ to allow access to properties but still prevent onward routing of non-compliant vehicles onto Holburn Street and Union Street. Note this does not impact on any modelling or appraisal work or indeed the main operation of the LEZ, it simply changes the look of the LEZ and provides some additional access. **It is therefore proposed to amend the LEZ boundary to remove Union Grove and Albyn Lane from the LEZ (Figure 1).**

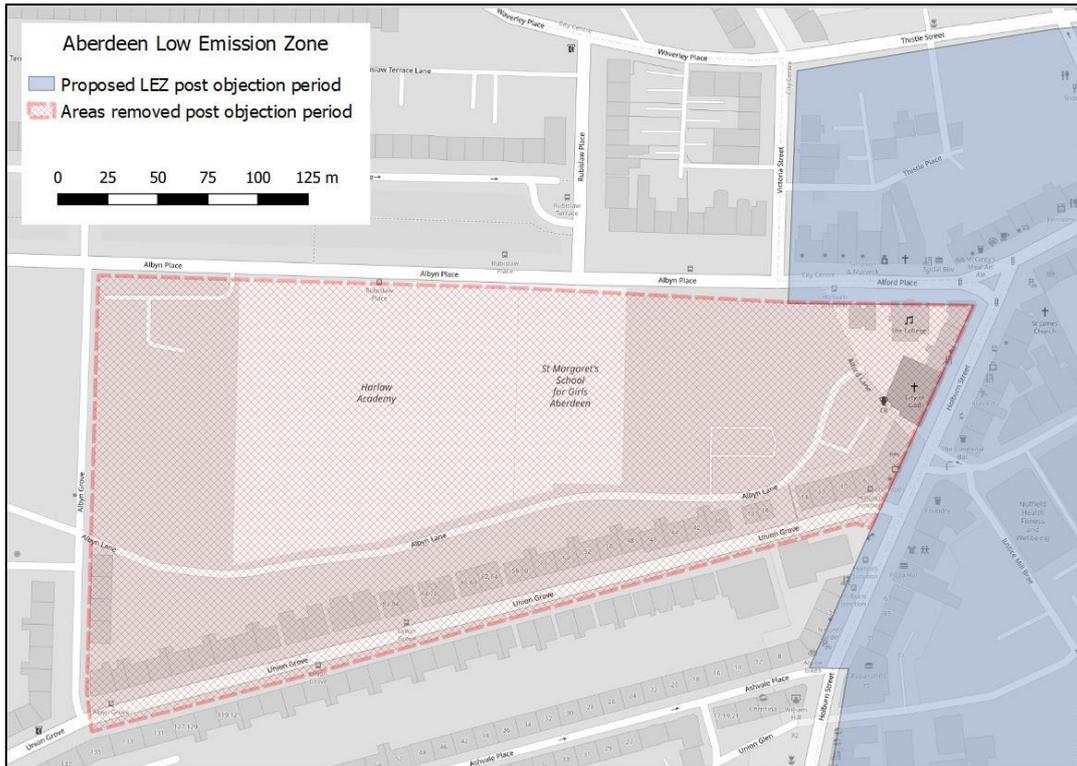


Figure 1: Proposed Revised Western Boundary

Issue 4: Concerns about the inclusion of Littlejohn Street within the LEZ as this is a largely residential street and residents and local businesses will be impacted

Response: Following a high number of submissions raising concerns about Littlejohn Street, this area was revisited in the traffic model. Outputs suggest that removing Littlejohn Street from the LEZ would have negligible impacts on traffic and hence air quality (see Figure 2 below which shows the modelled traffic flow differences on key streets in the area when Littlejohn Street is removed from the LEZ).

	AM	IP	PM	12 Hour
John St EB	-6%	2%	-7%	-2%
John St WB	-8%	-4%	0%	-4%
St Andrew St EB	0%	-2%	1%	0%
St Andrew St WB	-5%	-3%	-2%	-3%
Blackfriars St NB	2%	-8%	5%	-1%
Blackfriars St SB	5%	1%	3%	3%
Littlejohn St EB	-1%	3%	6%	3%
Gallowgate NB	3%	-13%	-5%	-8%
Gallowgate SB	-1%	-5%	5%	-2%

Figure 2: Modelled Flow Differences with Littlejohn Street removed from the LEZ

It is therefore proposed to amend the LEZ boundary to remove Littlejohn Street (Figure 3).

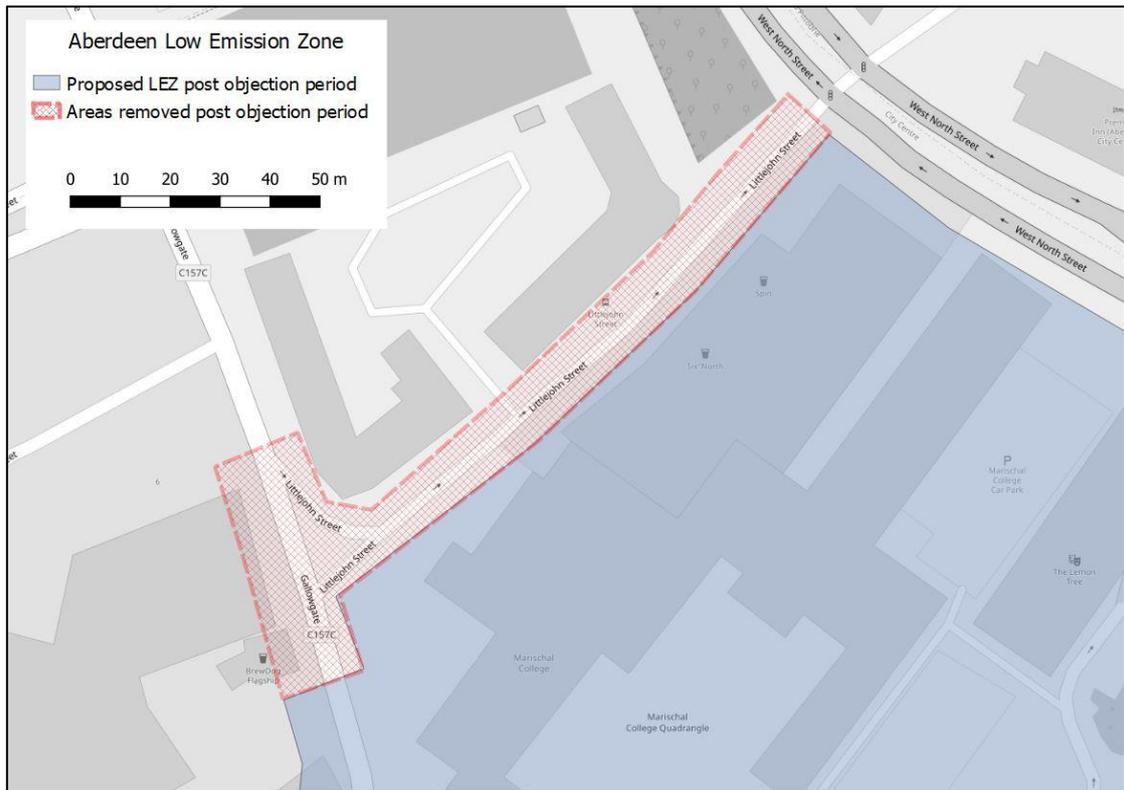


Figure 3: Proposed Revised Boundary (Littlejohn Street / Gallowgate)

Issue 5: Concern that the one-way system on north Hardgate forces traffic using this section into the LEZ

Response: It is proposed to amend the LEZ boundary to allow non-compliant traffic using the Hardgate to exit via Willowbank Road onto Holburn Street (as per Figure 4). This should have minimal impacts on traffic and air quality as the change would only apply to traffic exiting Hardgate onto Willowbank Road and then heading westwards towards Holburn Street. Traffic turning right onto Willowbank Road from Hardgate would still require to be LEZ-compliant.

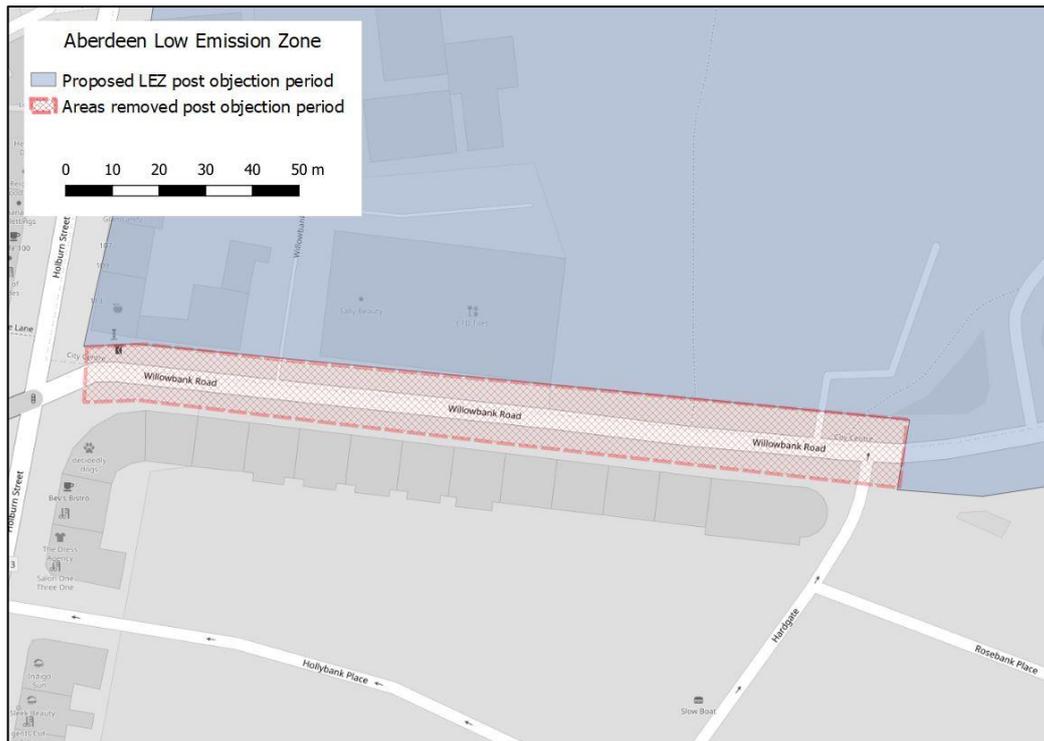


Figure 4: Proposed Revised Boundary (Willowbank Road)

Issue 6: Concern that the LEZ will increase travel distances, congestion and pollution

Response: While the LEZ will introduce longer travel distances for trips that continue to be made in a non-compliant vehicle, the impacts of this have been tested in traffic and air quality models, and the LEZ is anticipated to reduce congestion and emissions overall. Some potential re-routing concerns have been observed in the model and mitigation identified where relevant. ACC is committed to monitoring the impacts of the LEZ once operational and addressing any problems encountered. **No amendments are therefore proposed.**

Issue 7: Concern that the LEZ does not consider emissions from trains and ships

Response: Ships within Aberdeen Harbour are not in scope of the LEZ. The contribution of shipping to NO₂ levels in the City Centre has been identified as less than 10% of total emissions. Emissions from trains are not measured by ACC as the number, location and nature of the train operations fall below the threshold required for consideration. They are insignificant when compared to other transport emission sources in the city and very localised. **No amendments are therefore proposed.**

Issue 8: Concern about the impacts on local residents and businesses

Response: Funding has also been made available from Transport Scotland to help residents and businesses become LEZ-compliant, with support available for the retrofitting of non-compliant vehicles with the costs of purchasing a compliant vehicle, or to change transport mode. The impacts of the LEZ are being mitigated via the introduction of a two-year grace period to allow residents and businesses additional time to comply with LEZ requirements. **No amendments are therefore proposed.**

Issue 9: Concern that the LEZ is too small and/or the grace period is too long

Response: Throughout the LEZ option development and testing process, ACC has sought to balance the need to respond to longstanding issues of poor air quality in the city centre (for the benefit of the health and wellbeing of our residents and visitors) with the need to maintain accessibility of the city centre to support our local businesses as they recover from the impacts of the COVID-19 pandemic.

We believe the proposed LEZ strikes an appropriate balance. **No amendments are therefore proposed.**

Issue 10: Improving traffic flow and making it easier for people to use sustainable transport would be preferable to a LEZ

Response: Modelling has shown that neither a LEZ nor traffic reductions alone will achieve all air quality objectives, and a two-pronged approach is required – a LEZ with complementary traffic reductions. This is why our preferred package is the LEZ accompanied by traffic restrictions on and around Union Street, the latter of which is now being progressed via the City Centre Masterplan. This will also see the development of much more pedestrian and cycle-friendly spaces in the city centre and enhanced bus accessibility and permeability. **No amendments are therefore proposed.**

Summary:

Following analysis of the submission received during the objection period, it is therefore proposed to remove the following streets from the LEZ boundary:

- Littlejohn Street;
- Willowbank Road (Holburn Street to Hardgate)
- Union Grove; and
- Albyn Lane.

Figure 5 shows the proposed changes, with the final proposed LEZ boundary in Figure 6.

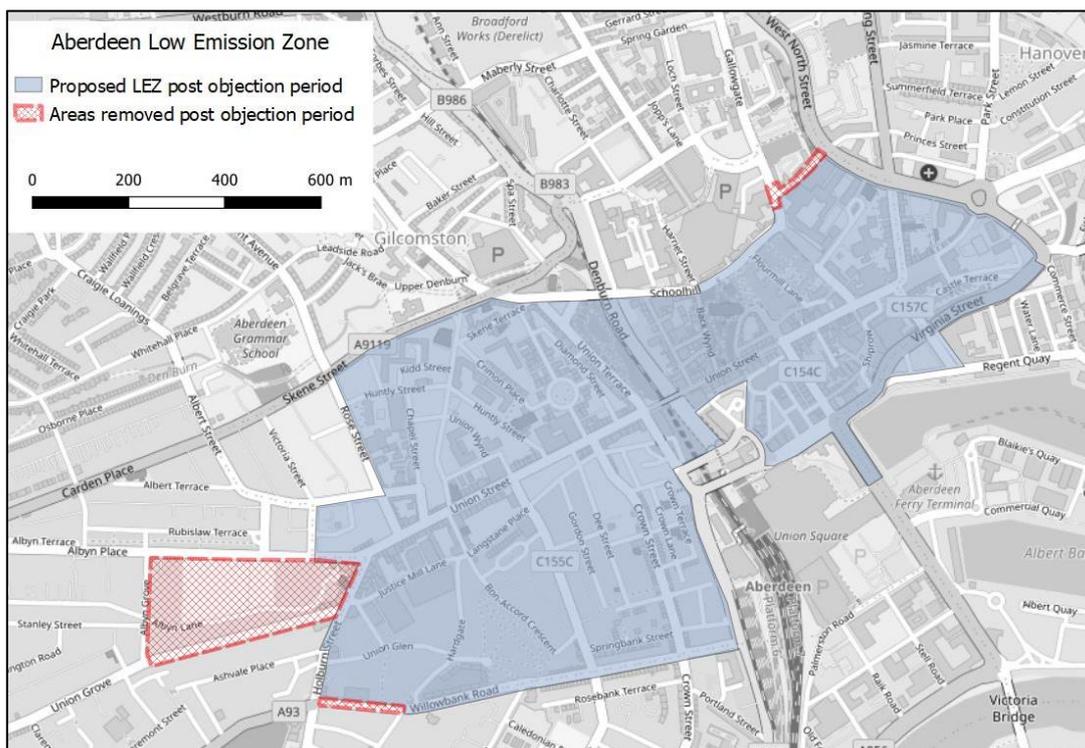


Figure 5: Proposed LEZ Changes Post-Objection Period

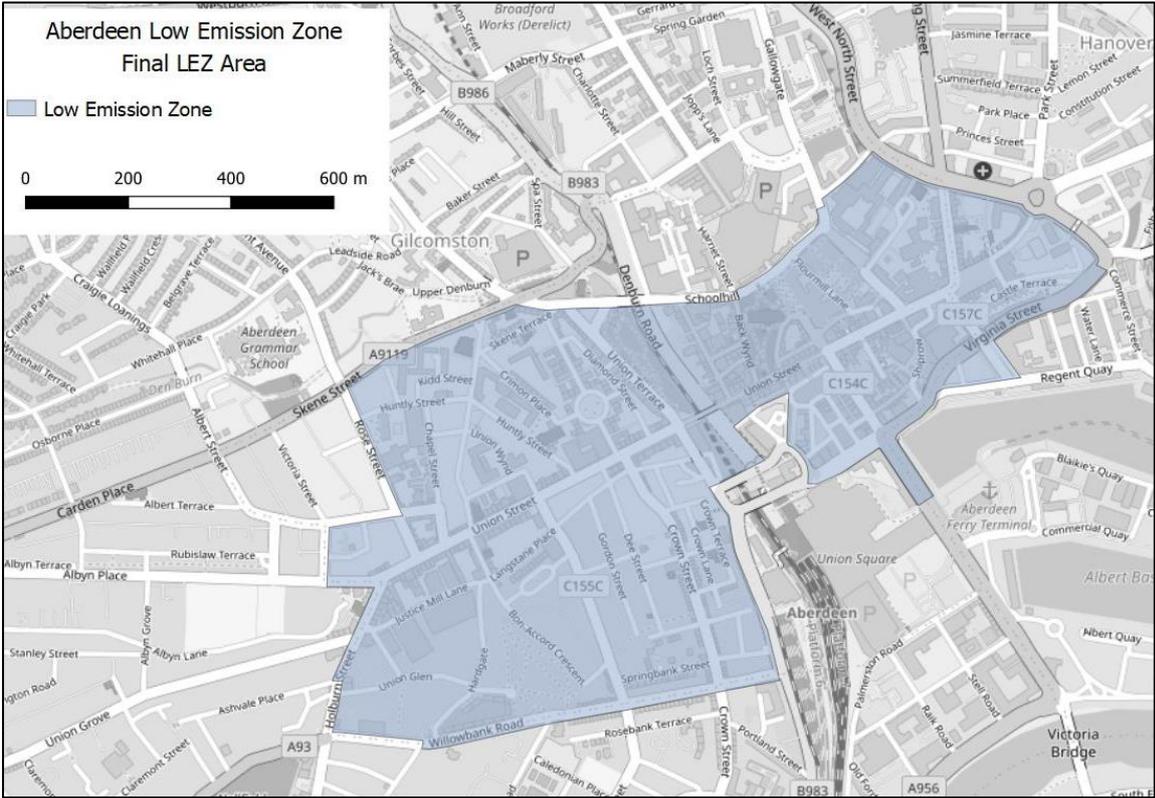


Figure 6: Final proposed LEZ for Submission