

**NATIONAL LOW EMISSION FRAMEWORK – INTERIM
STAGE 2 ASSESSMENT – EXECUTIVE SUMMARY
REPORT**



ABERDEEN LOW EMISSION ZONE

NATIONAL LOW EMISSION FRAMEWORK – INTERIM STAGE 2 ASSESSMENT – EXECUTIVE SUMMARY REPORT

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1. INTRODUCTION

1.1 Background

- 1.1.1 In September 2017, the Scottish Government, in their [Programme for Government](#), committed to the introduction of Low Emission Zones (LEZs) into Scotland's four biggest cities (Glasgow, Edinburgh, Dundee and Aberdeen) by 2020.
- 1.1.2 Despite improvements in air quality since the introduction of the Aberdeen City Council (ACC) Air Quality Action Plan, there remain several locations in the city where exceedances of emissions exist and where the Air Quality Standards (AQS) are not being met. While the number of exceedances of the nitrogen dioxide (NO₂) annual mean objective has decreased since annual monitoring began, a LEZ is being introduced in the city to accelerate Aberdeen's required compliance with the AQS.
- 1.1.3 An assessment and appraisal process to inform the size and scope of Aberdeen's LEZ follows the [National Low Emission Framework](#) (NLEF) guidance. The NLEF is "*an air quality-focused, evidence-based appraisal process developed to help local authorities consider transport related actions to improve local air quality, where transport is identified as the key contributor to air quality problems*" (NLEF, 2019).
- 1.1.4 NLEF is a two stage process consisting of Stage 1 Screening and Stage 2 Assessment.
- 1.1.5 The NLEF Stage 1 screening should review Aberdeen's Local Air Quality Management and build an evidence base to assist in the decision of whether a LEZ is appropriate for an Air Quality Management Area (AQMA) and subsequently inform the appraisal and implementation of Aberdeen's LEZ through the Stage 2 Assessment process. Transport Scotland advised Aberdeen City Council (ACC) that NLEF Stage 1 was not formally required as Aberdeen are committed to delivering a LEZ for the city as a result of the Programme for Government commitment.
- 1.1.6 A first Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework Interim Stage 2 Report, SYSTRA 2020*) was published in June 2020. The report provided an evidence base and policy review from which came the identification of the LEZ objectives and the LEZ options for stakeholder and public consultation and detailed testing through local traffic and air quality models.
- 1.1.7 The second Interim NLEF Stage 2 Assessment Report builds on the first interim report and incorporates findings from public and stakeholder engagement and detailed traffic modelling to identify a final LEZ option for Aberdeen.
- 1.1.8 The final Aberdeen LEZ option identified in this second Interim NLEF Stage 2 Report will then be subject to further stakeholder and public consultation, as set out in the [LEZ Regulations](#). It will also be subject to detailed impact and environmental assessments (Strategic Environmental Assessment, Integrated Impact Assessment, Business and Regulatory Impact Assessment) and be assessed in the National Modelling Framework (NMF) Aberdeen City Air Quality Model before the NLEF process is finalised and a final NLEF Stage 2 Report is prepared. It is expected that these tasks will be complete by autumn 2021.
- 1.1.9 **This report summarises the second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*).**

1.2 Legislative Framework

- 1.2.1 Low Emission Zones are included in the [Transport \(Scotland\) Act 2019](#) which received Royal Assent in November 2019. The Act provides the legislative framework for Scottish local authorities to design, establish and operate nationally consistent LEZs.
- 1.2.2 The accompanying LEZ Regulations were laid in Parliament in January 2021, thereby allowing Scottish Ministers to set nationally consistent standards (Regulations) on LEZ matters specified in the Act (e.g. emission standards, penalties and exemptions, statutory consultees). There are two sets of regulations for LEZs in Scotland. The [Low Emission Zones \(Emission Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#) cover the topics of emission standards, exemptions, penalty charge rates, and enforcement. [The Low Emission Zones \(Scotland\) Regulations 2021](#) cover the topics of consultation, publication and representations, examinations, approved devices, accounts and amending or revoking LEZs.
- 1.2.3 A full review of the plans, policies and strategies that relate to the introduction of a LEZ in Aberdeen is provided in Chapter 3 of the second Interim NLEF Stage 2 Assessment Report. The application of the legislative framework in the context of Aberdeen's LEZ is detailed in Chapter 8 of this summary.

1.3 Covid-19 pandemic

- 1.3.1 Due to the impact of the Covid-19 pandemic in 2020 and 2021, plans to implement LEZs were temporarily paused with an indicative timeline for the introduction moved to between February 2022 and May 2022. The LEZ Leadership Group, which includes Scottish Ministers and representatives from Glasgow City Council, The City of Edinburgh Council, Dundee City Council, Aberdeen City Council, Public Health Scotland and SEPA, agreed the [indicative timeframe](#) to introduce LEZs across Scotland's four largest cities.
- 1.3.2 It is recognised that the Covid-19 pandemic has had an unprecedented impact on society, including on the wider environment and the economy. Transport Scotland and ACC recognise that the Covid-19 pandemic may significantly influence future travel demand and in turn emissions attributed to road transport. Transport Scotland commissioned a study to consider the uncertainty over what travel will look like after the Covid-19 pandemic has ended. Outcomes from this study are used to inform the final LEZ Option.
- 1.3.3 In light of the difficulties faced by many throughout 2020 and 2021, ACC were keen to understand the level of support for the introduction of a LEZ in the city post pandemic and gauge the impact the pandemic may have had on businesses and bus operators in preparing for its introduction. As a result, additional consultation on this issue was undertaken in March 2021, with the outcomes used to inform the final LEZ Option detail.

2. OBJECTIVES OF ABERDEEN LOW EMISSION ZONE

2.1 Objectives of Aberdeen's Low Emission Zone

2.1.1 Objectives were developed by the Aberdeen LEZ Project Group, comprising representatives of ACC, Aberdeenshire Council, Nestrans, NHS Grampian, Transport Scotland, SEPA and SYSTRA. Two primary objectives were identified to reflect that the principal aim of a LEZ is to improve air quality and a requirement within the Transport (Scotland) Act that a LEZ should contribute towards the climate change targets (towards net zero by 2045) set out in the Climate Change (Scotland) Act 2009.

2.1.2 The objectives for Aberdeen's Low Emission Zone were agreed at the City Growth and Resources Committee meeting on 5th December 2019, in the light of the context set out above.

2.1.3 Aberdeen's Low Emission Zone will:

Improve air quality in Aberdeen by reducing harmful emissions from transport and delivering on the Scottish Government's statutory air quality objectives.

Support climate change targets by reducing road transport's contribution to emissions.

2.1.4 It is recognised that a LEZ can help realise wider benefits beyond air quality improvement, but that these are influenced by many other factors and not solely or directly attributable to a LEZ. Therefore the following supplementary objectives for Aberdeen's Low Emission Zone have been identified:

- Protect public health and wellbeing;
- Support local and regional transport strategies by contributing to the development of a vibrant, accessible, and safe city centre, where the volume of non-essential traffic is minimised and active and sustainable transport movements are prioritised; and
- Contribute to ongoing transformational change in Aberdeen, helping promote the city as a desirable place to live, visit and invest in.

3. AIR QUALITY IN ABERDEEN

3.1 Introduction

3.1.1 ACC has a legal obligation to regularly review and assess air quality in the city, and to determine whether or not the air quality objectives are likely to be achieved. As of 2016, there is a requirement on ACC to deliver Annual Progress Reports (APR) to summarise the work being undertaken by the local authority to improve air quality and report any progress that has been made.

3.1.2 The APRs provide extensive detail on existing air quality issues in Aberdeen City, the level of success from the Local Air Quality Management (LAQM) measures and provide a key source of information for the NLEF process. ACC have produced APRs for 2016 to 2020. The results and findings of the [2019 APR](#) and [2020 APR](#) have been used to inform the option development and appraisal process for Aberdeen's LEZ.

3.1.3 A summary of the 2019 air quality data (reported in the [2020 APR](#)) is provided in Section 3.2 below. Detailed analysis of air quality in Aberdeen is reported in the second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*).

3.2 2019 Air Quality Monitoring Data

3.2.1 ACC undertook automatic (continuous) monitoring at 6 sites and non-automatic (passive diffusion tube) monitoring of NO₂ at 72 sites during 2019. All monitoring site locations (continuous and passive) are shown in Figure 3.1, with a summary of observed individual pollutants described below.

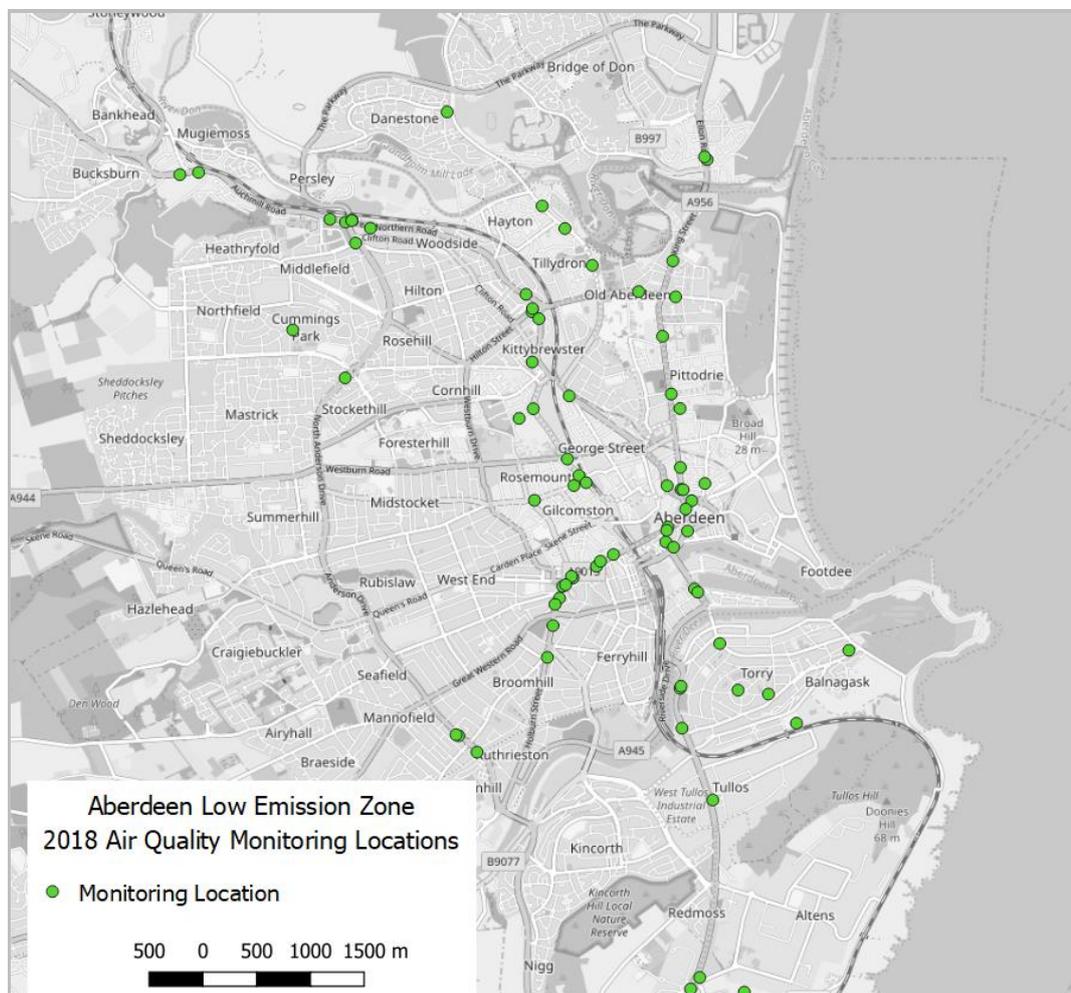


Figure 3.1 : ACC 2018 Monitoring Locations

Nitrogen Dioxide (NO₂)

- 3.2.2 The [2020 APR](#) provided the full ratified and adjusted 2019 dataset for monthly means for automatic monitoring sites and diffusion tubes.
- 3.2.3 The report states all automatic monitoring site data in 2019 was comparable to 2017 and 2018 levels and that concentrations at all automatic sites were below the annual mean air quality objective of 40 µg/m³ for the second year running. Generally, NO₂ levels monitored across Aberdeen were marginally lower than previous years. The report states data from the diffusion tube network was comparable to 2017 and 2018 and that exceedances of the annual mean objective occurs in the city centre AQMA only.
- 3.2.4 2019 NO₂ levels at monitoring locations outside the AQMAs remain well below the annual mean objective except for Skene Square where diffusion tube data suggest levels continue to be just below the threshold of the annual mean objective. Major transportation infrastructure measures with an anticipated completion date in 2023 will be implemented around Berryden Road and the Skene Square area to improve travel connectivity, reduce congestion and impact on air quality at this location.
- 3.2.5 The locations where 2019 annual mean concentrations of NO₂ are recorded as greater than 36 µg/m³ is detailed in Table 3.1 alongside the annual mean concentrations recorded from 2015 to 2018. The cells highlighted in grey are the locations where the AQO of 40 µg/m³ was exceeded.

Table 3.1 : Annual Mean Concentrations of NO₂ greater than 36 µg/m³

Site ID	Site Name/Location	AQMA	Annual mean NO ₂ concentration (µg/m ³)				
			2015	2016	2017	2018	2019
DT10	184/192 Market Street	City Centre	56.1	54.1	47.6	47.0	47.0
DT11	105 King Street	City Centre	54.4	51.1	48.1	48.0	45.0
DT9	39 Market Street	City Centre	50.9	50.2	47.9	46.0	44.0
DT12	40 Union Street	City Centre	49.8	48.9	45.9	44.0	43.0
DT17	43/45 Union Street	City Centre	51.8	46.7	42.8	44.0	43.0
DT19	468 Union Street	City Centre	53.3	45.4	40.9	40.0	43.0
DT29	469 Union Street	City Centre	58.2	48.8	42.7	45.0	42.0
DT82	7 Virginia Street	City Centre	0.0	0.0	0.0	44.0	42.0
DT30	335 Union Street	City Centre	50.9	46.5	41.9	41.0	39.0
DT18	14 Holburn Street	City Centre	50.2	48.5	41.6	39.0	39.0
DT16	1 Trinity Quay	City Centre	45.4	43.8	37.4	37.0	39.0
DT73	61 Skene Square	No	0.0	0.0	39.7	40.0	38.0
DT77	27 Skene Square	No	0.0	0.0	0.0	37.0	38.0
DT39	819 Great Northern Road	Anderson Dr	54.2	47.4	45.4	43.0	37.0
CM2	Union Street	City Centre	46.0	43.0	40.0	38.0	36.0
DT33	16 East North Street	City Centre	46.4	43.1	40.4	40.0	35.0
CM5	Wellington Road	Wellington Rd	40.0	46.0	39.0	39.0	35.0
DT25	21 Holburn Street	City Centre	50.3	42.8	37.1	37.0	35.0
DT22	104 King Street	City Centre	44.1	39.3	36.2	36.0	34.0
Total No. Sites > 40 µg/m³			15	15	11	9	8

source: 2020 Air Quality Annual Progress Report (APR) for Aberdeen City Council

- 3.2.6 In total, there are 8 locations where annual mean concentrations of NO₂ exceed the AQO of 40 µg/m³ (down 1 from 2018) and a further 7 sites where annual mean concentrations of NO₂ exceed 36 µg/m³ (down 3 from 2018). Table 3.1 shows that the total number of exceedance locations in the city continue to reduce each year. From 2018, there are three locations where annual mean concentrations of NO₂ have increased in 2018, namely 468 Union Street (DT19), 1 Trinity Quay (DT16) and 27 Skene Square (DT77).
- 3.2.7 Figure 3.2 shows the locations where annual mean concentrations of NO₂ were recorded as greater than 36 µg/m³ in 2019.

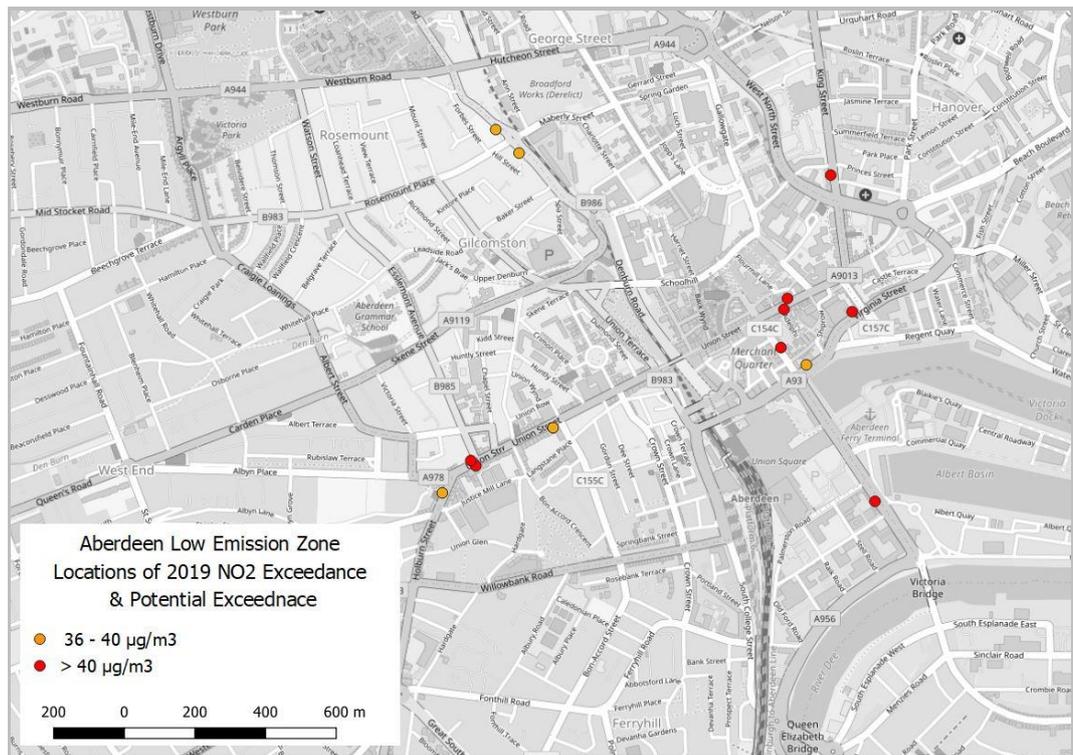


Figure 3.2: 2018 Annual Mean Concentrations of NO₂ greater than 36 µg/m³ (City Wide)

- 3.2.8 The 2020 APR also compares the continuous monitored NO₂ hourly mean concentrations for the past 5 years with the air quality objective of $200\mu\text{g}/\text{m}^3$, *not to be exceeded more than 18 times per year* and reports that no exceedances of the hourly mean objective were identified at automatic monitoring locations in 2019, in line with 2018.

Particulate Matter (PM₁₀)

- 3.2.9 The 2019 APR reports that no exceedances of the PM₁₀ annual mean objective ($18\mu\text{g}/\text{m}^3$) or 24 hour mean objective ($50\mu\text{g}/\text{m}^3$ not to be exceeded more than 7 times per year) were observed at any of the continuous monitoring sites in 2019. This is in line with 2018 where the 24 hour mean objective has been met at all monitoring sites for the last 4 years.

Particulate Matter (PM_{2.5})

- 3.2.10 There are 5 continuous monitoring sites measuring PM_{2.5} levels in Aberdeen City and no exceedances of the annual mean were recorded at any of the continuous monitoring sites in 2019, in line with 2018.

3.3 Focus of Aberdeen's LEZ

- 3.3.1 Analysis of observed 2019 air quality data demonstrated that the City Centre AQMA captures all recorded instances of exceedances of the NO₂ air quality objectives, with no exceedances outside this area.

- 3.3.2 In 2018 there was one exceedance of the NO₂ objective in the Anderson Drive AQMA, at Haudagain roundabout but this has fallen below the legal threshold in 2019 for the first time since monitoring began in 2009. Transport studies also highlight the committed Haudagain Roundabout improvement scheme is anticipated to address congestion issues at this location with expected positive benefits for air quality. There are no current exceedances of the air quality legal limits in the Wellington Road AQMA.

- 3.3.3 The current observed air quality data has therefore identified the focus of the NLEF appraisal of Aberdeen's LEZ is the Aberdeen City Centre AQMA.

4. THE NATIONAL MODELLING FRAMEWORK

4.1 Introduction

4.1.1 The Cleaner Air for Scotland Strategy (CAFS) provided a commitment to develop a National Modelling Framework (NMF) to provide a standardised approach to modelling air quality to support the consideration of LEZs in Scotland. The NMF ensures that the analysis and generation of evidence to support decision-making in the LEZ development process is consistent across those local authorities undertaking a NLEF Stage 2 assessment.

4.1.2 The NMF air quality modelling is undertaken by SEPA who support local authorities throughout a Stage 2 assessment and the LEZ decision-making process. Modelling results from the NMF are detailed in Chapter 5 of the second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*).

4.2 Summary of NMF High Level Scenario Testing

4.2.1 The City Centre AQMA, in particular the Union Street, Holburn Street and King Street corridor currently experiences the highest number of NO₂ exceedances. The biggest emitters along these roads through the city centre are buses. These streets are lined with high buildings that can be described as narrow and deep “street canyons” which can trap air pollution close to ground level.

4.2.2 The high level Aberdeen NMF Model results show that should all buses meet the Euro VI standard, this would bring the largest single reduction in NO₂ network-wide and that this reduction is significantly more than any other vehicle type would provide. This suggests that a LEZ for Aberdeen will be required to include buses in order for a LEZ to achieve its air quality objective.

4.2.3 When applying modelled NO₂ reductions from the bus only scenario to observed exceedance locations however, the Aberdeen NMF Model predicts there to be 6 locations still exceeding 40 µg/m³ and a further 7 sites between 36 µg/m³ and 40 µg/m³. This result suggest that while a Euro VI bus fleet would bring the largest reduction in NO₂, this alone is not sufficient in addressing all exceedances in Aberdeen.

4.2.4 Whilst buses dominate emissions along the Union Street, Holburn Street and King Street corridor, diesel cars are the primary contributors to annual average total (oxides of nitrogen) NO_x elsewhere. Light goods vehicles (LGVs) are the third largest contributor with other Goods Vehicles adding smaller amounts. By combining the percentage reduction in NO₂ resulting from all vehicles being of LEZ standard, it can be inferred that an all vehicle LEZ does not bring a sufficient enough reduction in NO₂ to allow a LEZ alone to tackle all air quality exceedances. It can therefore be suggested at this stage, prior to any LEZ option development that a LEZ for Aberdeen will have to include all vehicle types and have to be delivered with traffic management measures if all exceedances of the air quality objectives are to be addressed.

5. LEZ OPTION GENERATION

5.1 Introduction

5.1.1 NLEF is objective-led and consistent with the principles of Scottish Transport Appraisal Guidance (STAG). The starting point for the Stage 2 assessment is to define the objectives for the potential LEZ to inform the LEZ option generation, sifting and development

5.1.2 The NLEF process identified the existing air quality problems and issues in Aberdeen, and the LEZ objectives were derived such that any options that satisfy these objectives will address the current air quality issues in the city.

5.1.3 Following STAG principles, an unconstrained option generation exercise was undertaken to allow all possible options to be considered and open to appraisal. This led to a large number of potential options that required sifting, refinement and high level appraisal to filter down to the relevant options to be carried forward to consultation and detailed appraisal and testing. The full option development, sifting, refinement and appraisal process is documented in second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*) and the final outcomes summarised below.

5.2 LEZ Options for consultation and detailed model testing

5.2.1 The NLEF Appraisal recommended that four main LEZ options be taken to wider consultation and detailed model testing undertaken using the NMF air quality model and the Paramics microsimulation traffic model. The analysis demonstrated that from the four options there were two possible variants to each option as follows:

- Option 1A – Union Street Area, including Denburn Rd (Figure 5.1)
- Option 1B – Union Street Area, excluding Denburn Rd (Figure 5.2)
- Option 2A – Union Street & George Street Area, including Denburn Rd (Figure 5.3)
- Option 2B – Union Street & George Street Area, excluding Denburn Rd (Figure 5.4)
- Option 3A – CCMP East including Denburn Rd (Figure 5.5)
- Option 3B – CCMP East excluding Denburn Road (Figure 5.6)
- Option 4A – CCMP, including Denburn Rd (Figure 5.7)
- Option 4B – CCMP, excluding Denburn Rd (Figure 5.8)

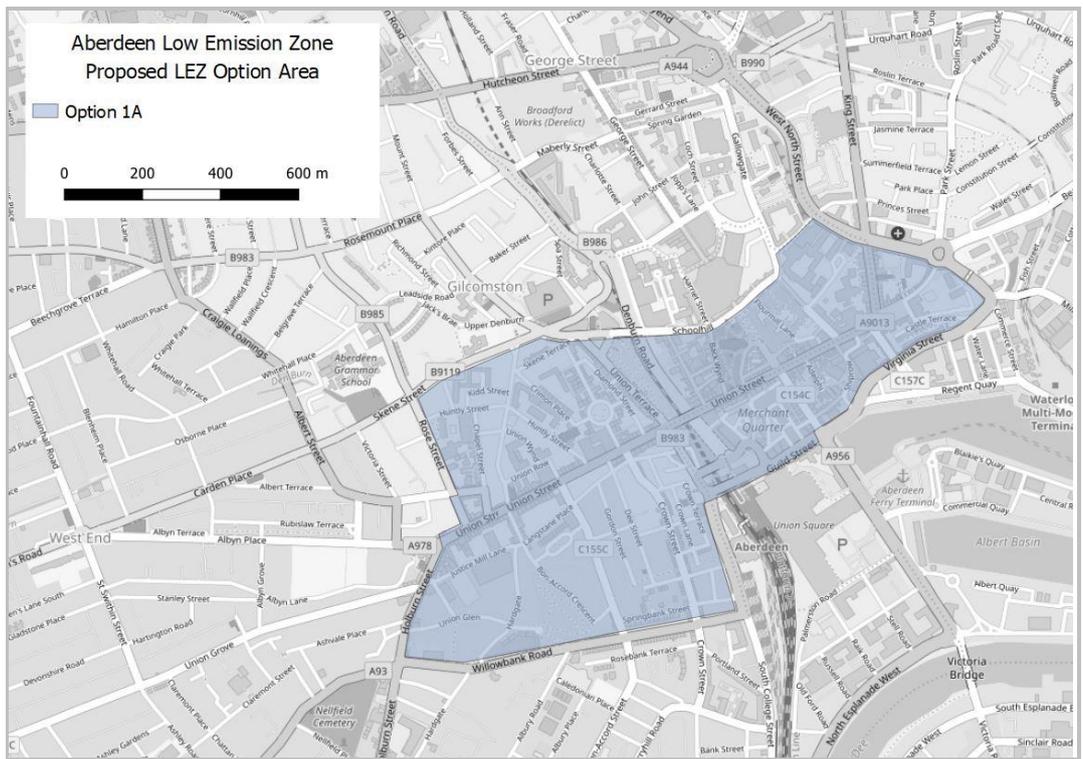


Figure 5.1 : Option 1A – Union Street Area, including Denburn Road



Figure 5.2 : Option 1B – Union Street Area, excluding Denburn Road

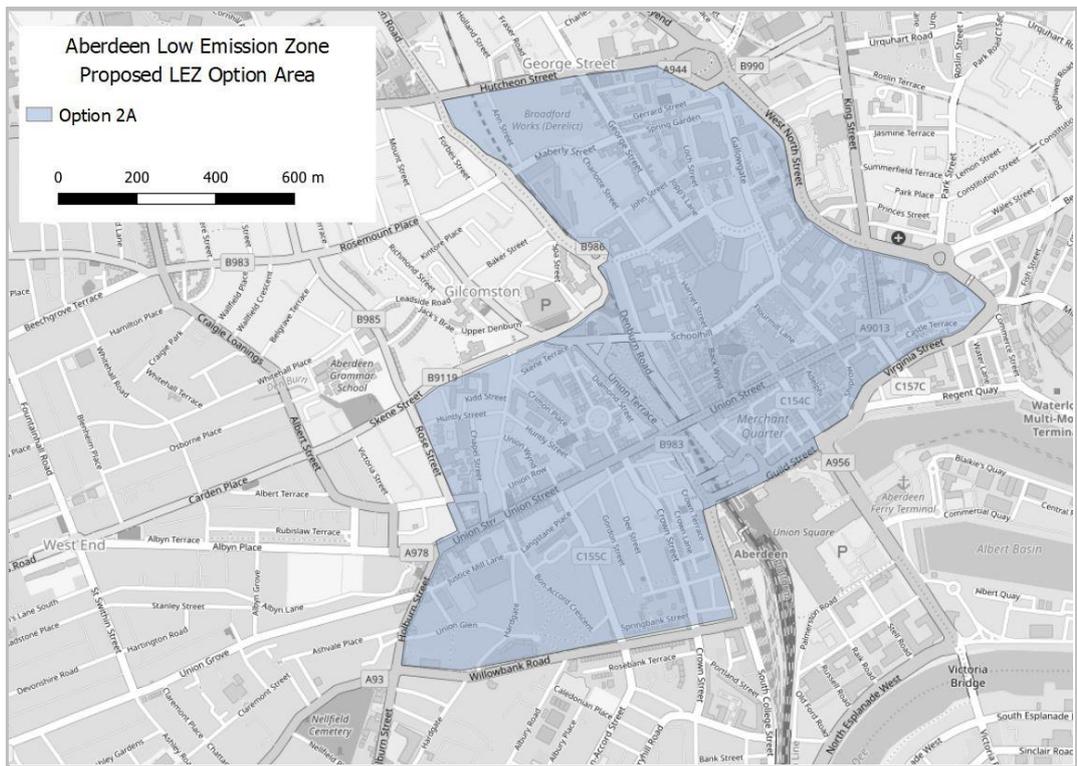


Figure 5.3 : Option 2A – Union Street and George Street Area, including Denburn Road

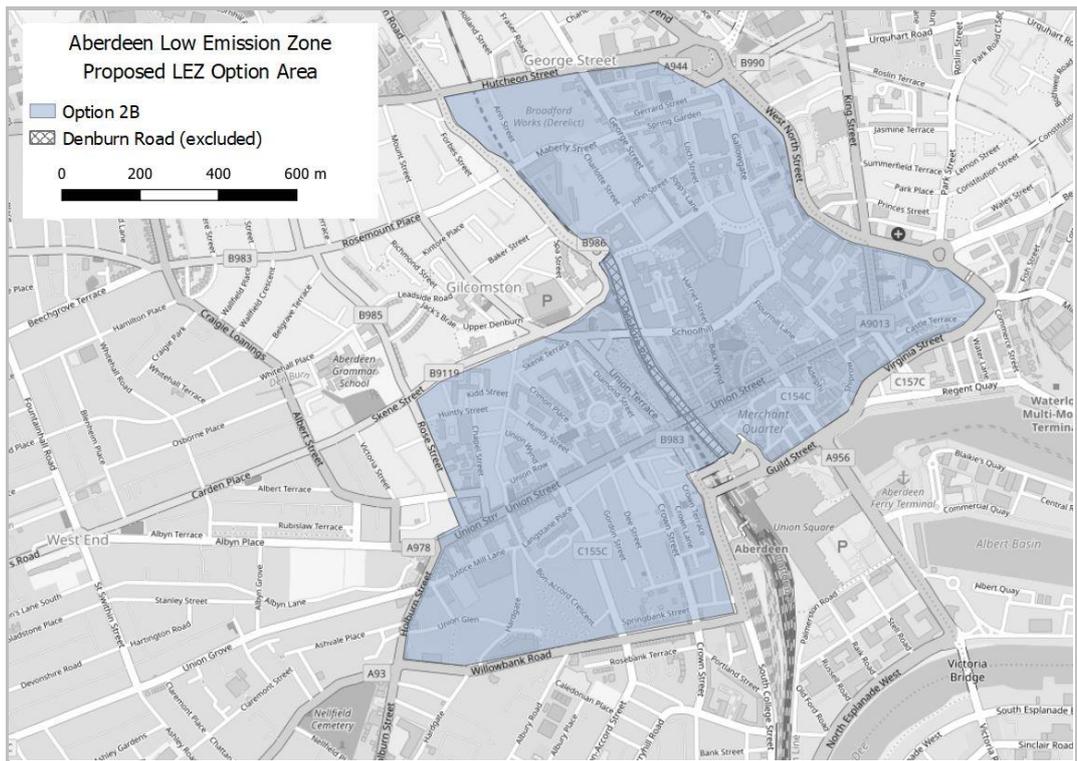


Figure 5.4 : Option 2B – Union Street and George Street Area, excluding Denburn Road

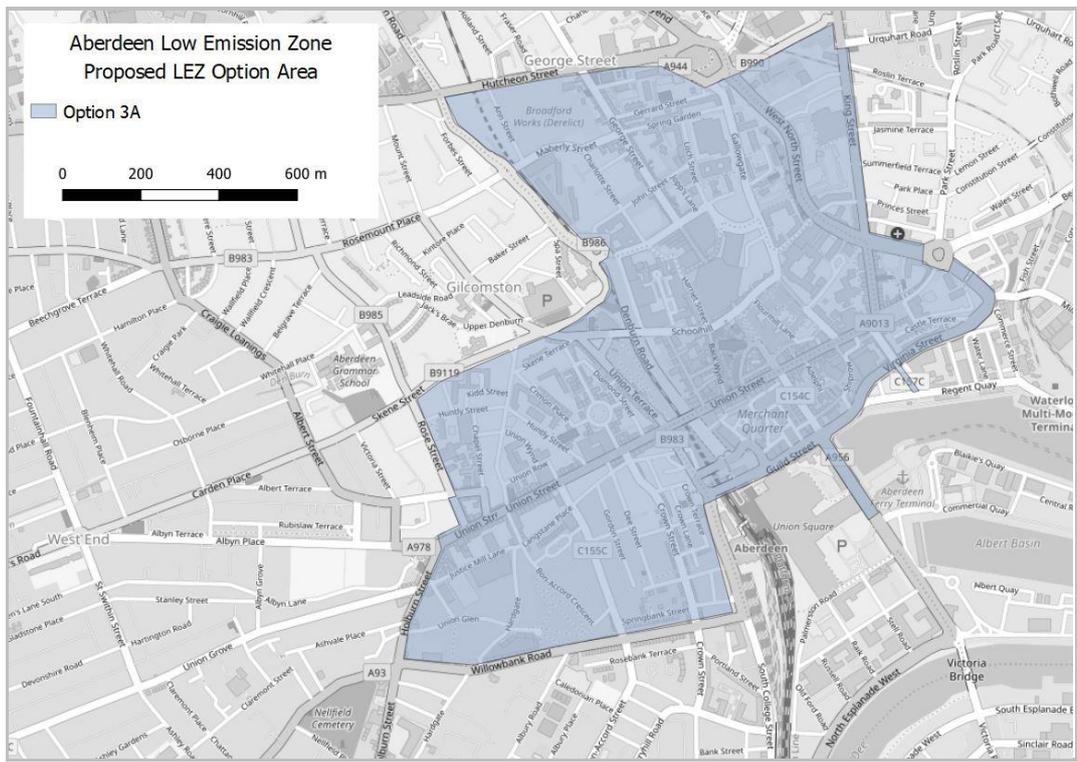


Figure 5.5 : Option 3A – City Centre Masterplan East, including Denburn Road

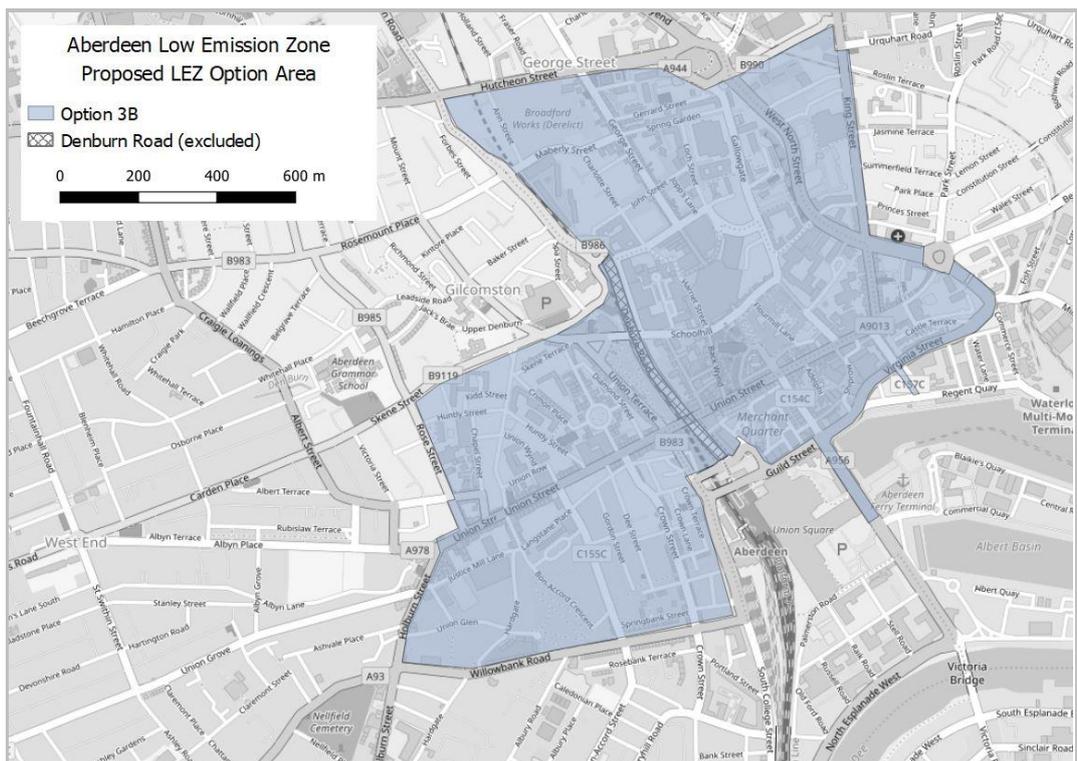


Figure 5.6 : Option 3B – City Centre Masterplan East, excluding Denburn Road



Figure 5.7 : Option 4A – City Centre Masterplan, including Denburn Road

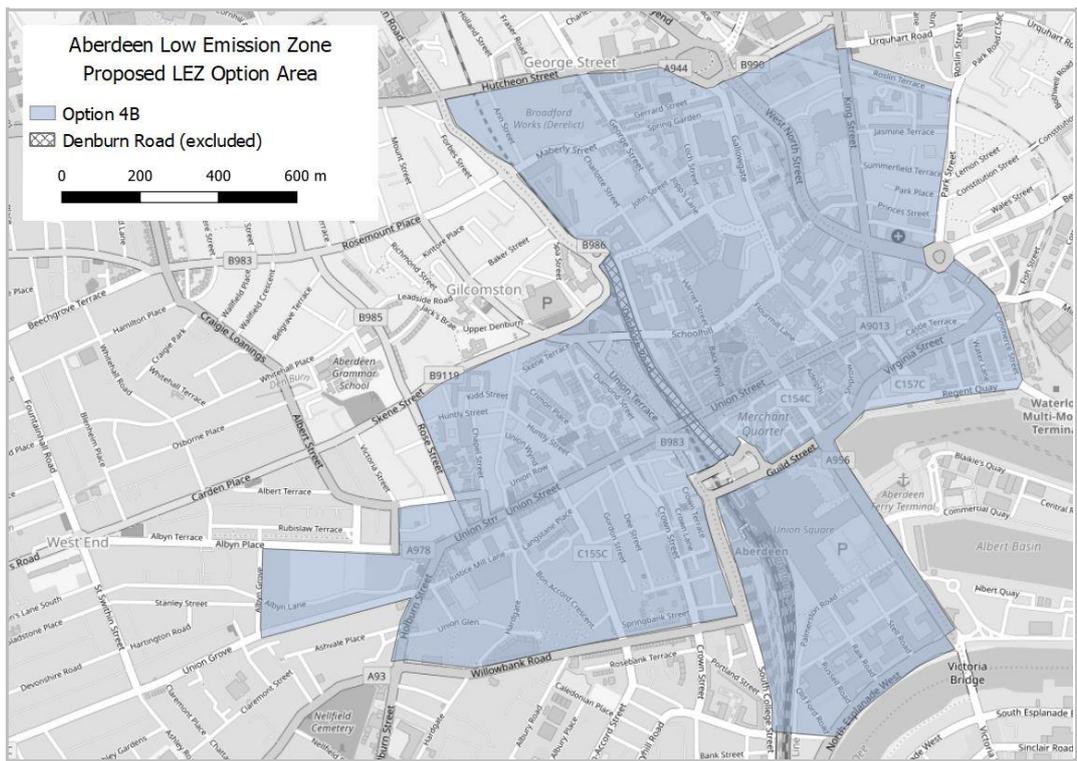


Figure 5.8 : Option 4B – City Centre Masterplan, excluding Denburn Road

6. LEZ PUBLIC AND STAKEHOLDER ENGAGEMENT

6.1 Introduction

- 6.1.1 Upon completion of the first Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework Interim Stage 2 Report, SYSTRA 2020*) ACC undertook a consultation exercise on the eight identified LEZ Options for consultation detailed in Chapter 5. The consultation took the form of an online public survey and face to face workshops with key (and statutory) stakeholders. The outcomes from the consultation period are reported in the City Growth and Resources Committee Report, June 2021 and summarised in second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*) with key outcomes detailed below.
- 6.1.2 An online public survey ran for six weeks from 14 September 2020 to 25 October 2020 and was administered by ACC. Consultation responses were also accepted by email to the Council's Transport Strategy address. The survey received 506 responses with a further 10 received by email. Of the 506 responses received, 488 (96.5%) were from individuals, 18 (3.6%) were from businesses
- 6.1.3 A range of workshops with key stakeholders were held concurrently with the live public survey dates during September and October 2020. Five workshops were held in total and the format involved a presentation by a member of the Aberdeen LEZ Delivery Group on the Interim NLEF Stage 2 Report findings and the recommended LEZ options, followed by a questions and answer session. The stakeholders represented at the workshops were as follows:
- Bus industry representatives:
 - Stagecoach East Scotland, First Bus, Bains Coaches and the Confederation of Passenger Transport (CPT)
 - Local freight industry representatives
 - Aberdeen Harbour
 - Community Councils:
 - George Street, Rosemount and Mile End, Castlehill and Pittodrie
 - Environmental/interest groups
 - Friends of the Earth, Aberdeen Cycle Forum, Asthma UK and British Lung Foundation Partnership, Aberdeen Environment Forum
 - Taxi representatives.
- 6.1.4 No business representatives attended the planned business workshops, despite several attempts to contact business groups and their members. This was considered likely to be a result that the current Covid-19 pandemic is having on businesses. It is recognised that the Covid-19 pandemic has had an unprecedented impact on society, including on the wider environment and the economy. In light of the difficulties faced by many throughout 2020 and 2021, particularly, in the context of an Aberdeen city centre LEZ, city businesses and bus operators, ACC were keen to understand the level of support for the introduction of a LEZ in the city post-pandemic and gauge the impact the pandemic may have had on businesses and bus operators in preparing for its introduction.
- 6.1.5 As such, a further business workshop was organised for April 2021, where representative from Union Square shopping centre and Aberdeen & Grampian Chamber of Commerce attended. Bus operators in the city have been consulted regularly and kept up to date with ongoing proposals for the city's LEZ and given the importance of bus compliance to the success of any LEZ, the operators were approached in March 2021 and asked to complete a short questionnaire.

6.2 Key Outcomes from Consultation of LEZ Options

- 6.2.1 The consultation showed that the introduction of a LEZ in Aberdeen is generally evenly supported and not supported, however the public responses do show an awareness of the benefits for the introduction of a LEZ in the city.
- 6.2.2 A consistent theme across the consultation exercises was the belief that the LEZ should be integrated with other improvements, such as general traffic reduction measures or an improved sustainable transport offering. Similarly there was recognition that the LEZ should not create new congestion or air quality problems in the city. Both these views are consistent with the approach and outcomes taken through the option development process and the subsequent traffic model analysis.
- 6.2.3 Bus operators have been significantly impacted by the Covid-19 pandemic and are not likely to be able to suitably invest in their fleets to meet a 2023 enforcement date. A 2024 enforcement date or later would provide more a realistic timeline to meet LEZ compliance. Across the consultation exercises, there was considerable support for the longest possible grace period to be applied although there was also notable support for the shortest grace period to apply.
- 6.2.4 Although the consultation did not conclude that any of the 8 LEZ options could be ruled out at this stage, support for any options that excluded Denburn Road was low.

7. LEZ TRAFFIC MODELLING AND DETAILED APPRAISAL

7.1 Introduction

7.1.1 In 2019, Aberdeen City Council commissioned the development of a traffic microsimulation model of Aberdeen City Centre for the purpose of assessing road network options associated with the development of a LEZ in Aberdeen.

7.1.2 The initial Base Model development (ACCPM19) is detailed in the report ‘Aberdeen City Centre Paramics Model Upgrade 2019’ (SYSTRA Ref: GB01T19F42/2, October 2020). The subsequent development of the 2024 Reference Case Model, from which the LEZ scenarios have been assessed, is detailed in the report ‘Aberdeen City Centre: Future Year (2024) Model Development Report (SYSTRA, Ref: GB01T20D62/1, December 2020).

7.1.3 The 2024 Reference Case model was used as a basis to test the eight LEZ boundary options detailed in Chapter 5 (LEZ options 1A to 4B), with these options forming the initial model test scenarios.

7.1.4 From the initial option model assessment process, there was clear evidence that further consideration of potential boundary options could be undertaken which would combine the benefits of both the smaller scale LEZ options (i.e. Option 1A) and the large scale LEZ options (i.e. Option 4A) and also reduce their disbenefits. The resultant Option 5 is shown in Figure 7.1. The option is shown to intersect all key approach routes into the city centre thereby having an impact on the volume of non-compliant traffic in the city centre on a much wider scale than the boundary itself, while still maintaining access to the majority of city centre car parks.

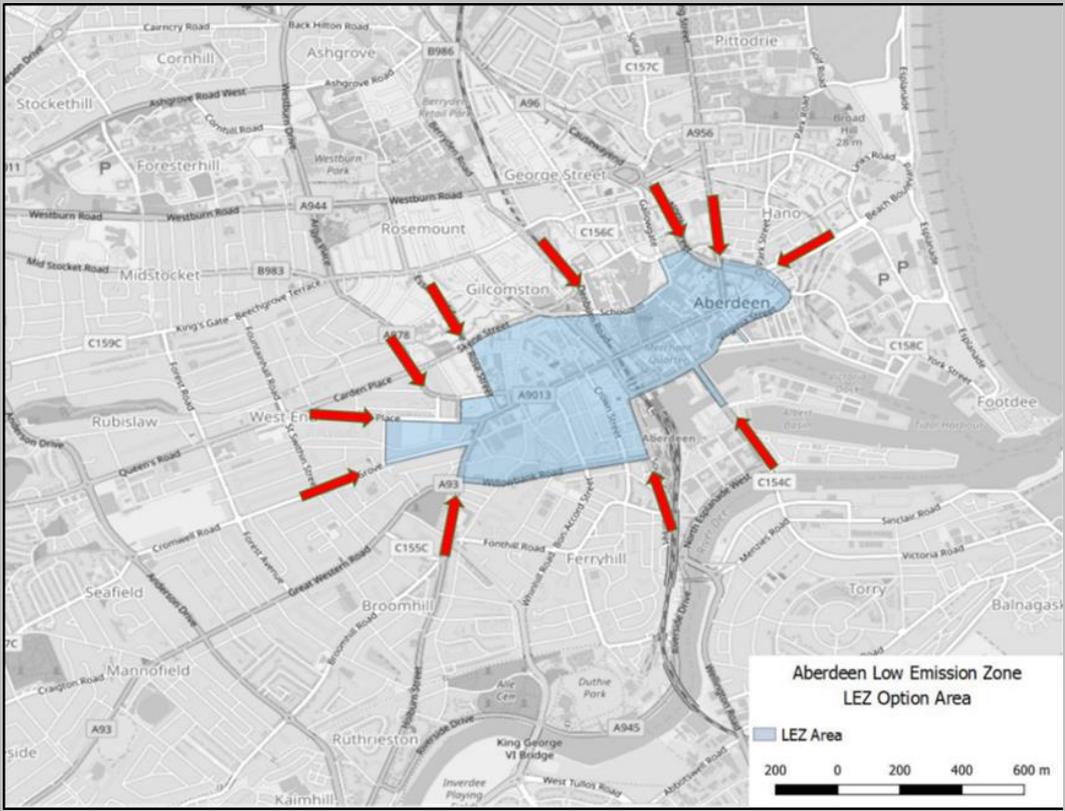


Figure 7.1 : LEZ Option 5

7.1.5 A LEZ Option Testing Report’ (SYSTRA Ref: GB01T20D62/2, May 2021) outlines the development of each of the LEZ option models and assesses the impact the introduction of each LEZ has on the Aberdeen Road network.

7.2 LEZ Boundary Option Sifting

7.2.1 The first step in the modelling assessment allowed for the total number of LEZ options to be reduced if they were shown to negatively impact on network traffic conditions or known air quality exceedance locations. The outcomes of this assessment are summarised below with full details provided in the accompanying *LEZ Option Testing Report*. Those options that remained after this initial assessment were progressed to option refinement (Section 7.3) and detailed modelling (Section 7.4).

7.2.2 The model appraisal of each of the LEZ scenarios included:

- Traffic Demand Level that the model was able to run at
- Traffic flow changes at the 2019 NO₂ exceedance locations
- Alignment to agreed North East of Scotland Roads Hierarchy
- Car Park Accessibility
- Residential Impact of LEZ boundary.

7.2.3 From the option sifting process detailed in the *LEZ Option Testing Report*, ACC agreed to take LEZ boundary Options 4A and 5 forward for further appraisal of their suitability, as shown in Figure 7.2

7.2.4 The initial modelling of these LEZ options highlighted that additional measures were required to fully address all air quality exceedances in the city and, after appraisal of these remaining options (Section 7.3), the supporting measures were identified through further detailed modelling (Section 7.4).

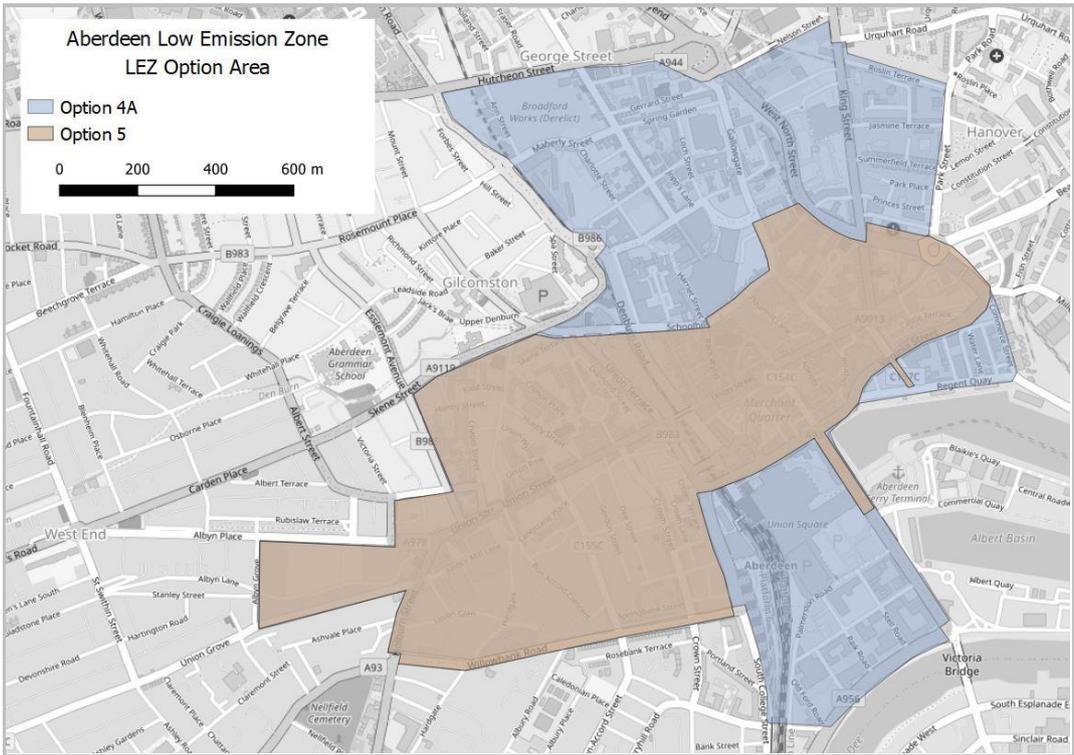


Figure 7.2 : LEZ Option 4A and Option 5

7.3 LEZ Option Appraisal

7.3.1 The NLEF is objective-led and consistent with the principles of Scottish Transport Appraisal Guidance (STAG). The LEZ option generation, sifting and development process and subsequent consultation and reporting undertaken through the NLEF closely mirrors that of the STAG Pre-Appraisal Stage. Following NLEF due process and initial traffic model analysis, two LEZ options remain, namely Option 4A and Option 5. To ensure their continued suitability as LEZ options a further appraisal exercise, aligned with the principles of STAG Part 1 Appraisal, was undertaken. It is important to note that NLEF does

not require a full STAG Appraisal to be undertaken, the STAG principals were simply utilised to provide structure to appraise the suitability of the two remaining options.

7.3.2 The LEZ option appraisal (and STAG Part 1 Appraisal) concentrated on the following areas:

- An appraisal of the likely impact of options against LEZ Objectives
- An appraisal of the likely impact of options against the STAG Criteria;
- An appraisal of the fit of options with established policy directives; and
- An appraisal of the feasibility, affordability and likely public acceptability of options.

7.3.3 Chapter 13 of the second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*) details the outcomes from the LEZ option appraisal with the results summarised in Table 7.1 below.

Table 7.1 : Summary of LEZ Option Appraisal

Appraisal Criteria		4A	5
LEZ Objective	1	++	++
	2	+	+
	3	+	++
	4	+	++
	5	+	++
STAG Criteria	Environment	++	++
	Safety	0	0
	Economy	-	+
	Integration	+	+
	Accessibility & Social Inclusion	-	0
Other criteria	Feasibility	Yes	Yes
	Affordability	Yes	Yes
	Public Acceptability	Yes	Yes

7.3.4 The appraisal of the two remaining LEZ options showed that Option 4A failed to meet the criteria for economy or accessibility and social inclusion. The appraisal identified that there were key issues and implications for Option 4A, namely:

- Alignment with agreed North East of Scotland Roads Hierarchy
- Access to city centre car parks and implications to city centre economic recovery post Covid-19
- Access to the city centre services and amenities for those who rely on transport made by non-compliant vehicles (particularly impacting vulnerable groups)
- Implications to the large number of residential properties within the LEZ area
- Option 4A will have a higher scheme costs and higher cost of compliance (for residents and businesses).

7.3.5 For these reasons, and in light of the impact of the Covid-19 pandemic to the city, it was agreed with ACC that Option 4A would not be progressed in the NLEF appraisal process. While the appraisal showed that there are also several issues and implications for Option 5, the appraisal concluded that each criteria scored neutral to positive and that further work through detailed modelling should be undertaken on Option 5 to identify a final preferred LEZ option for Aberdeen.

7.4 Detailed LEZ Modelling

7.4.1 The traffic model sifting (7.2) and option appraisal (7.3) identified LEZ Option 5 as the preferred LEZ option boundary. Detailed modelling was then undertaken to further develop the option and define the complementary package of measures required to

address the remaining predicted air quality exceedances and network operational issues identified in the initial LEZ model testing.

7.4.2 The following analysis was undertaken in the detailed assessment of Option 5 to develop a preferred final LEZ scheme for Aberdeen which best meet the objectives of the study:

- LEZ air quality improvement supporting measures
- Management of non-compliant traffic
- Finalisation of LEZ boundary
- Model statistics of final proposed LEZ.

7.4.3 The NLEF process recognised that additional traffic management interventions are required to be delivered alongside a LEZ in Aberdeen to ensure all of the statutory air quality objectives (AQO) are met. Any supporting interventions for Aberdeen's LEZ are required to complement other committed network proposals for Aberdeen City Centre to provide a package of measures which will meet the objectives of the LEZ and wider Council objectives for Aberdeen City Centre. These committed proposals include the City Centre Masterplan (CCMP) and the changes to the roads hierarchy.

7.4.4 To enable the development of a package of measures to meet the objectives of the LEZ study and satisfy the AQOs, traffic modelling was utilised to identify if any elements of the CCMP not yet implemented would enhance and support the LEZ in meeting the objectives.

7.4.5 The Option 5 LEZ boundary was shown to generally fit well with the agreed revised hierarchy proposals. Option 5 has the effect of restricting all non-compliant vehicles from routing through the city centre area, but critically, it does not restrict access to the city centre (car park options still available for all traffic). This is consistent with other policies and aspirations for Aberdeen City Centre. However, the model analysis highlighted that some traffic was finding local routes around the periphery of the LEZ but within the boundary of Anderson Drive and, through discussion with ACC, several options to manage the displacement of traffic were modelled in detail.

7.4.6 The results from this detailed modelling are summarised in the second Interim NLEF Stage 2 Report, with full details provided in the accompanying *LEZ Option Testing Report* (SYSTRA Ref: GB01T20D62/2, May 2021). The resulting final preferred LEZ Option, incorporating a package of supporting measures that align with other committed network proposal for Aberdeen City Centre, is detailed below in Chapter 8.

8. ABERDEEN LEZ OPTION DETAIL

8.1 Introduction

8.1.1 The analysis undertaken and summarised in Chapters 5 to 7 has identified a final preferred option for Aberdeen's LEZ, including the package of supporting measures to enable the LEZ to meet its objectives. The next stage of the NLEF process is to define the LEZ Option detail in line with the Transport (Scotland) Act 2019.

8.1.2 [Section 14](#) of the Transport (Scotland) Act 2019 states the required content of a LEZ, namely:

- The zone to which it relates, which must be specified by
 - i. reference to an area on a map, and
 - ii. specifying the roads (or parts of a road) which form part of the zone
- the types of vehicles to which it applies
- the date on which the scheme comes into effect
- the grace periods applicable
- the LEZ objectives

8.1.3 This chapter provides information on the required content of Aberdeen's LEZ.

8.2 Aberdeen LEZ Area

8.2.1 In line with [Section 14](#) of the Transport (Scotland) Act 2019, the final detailed drawing of the Aberdeen LEZ Option is shown in Figure 8.1

8.2.2 The detail presented in Figure 8.1 is considered appropriate for this stage of the Interim Stage 2 Reporting and subsequent submission to Aberdeen City Council Committee and for the consultation period thereafter. However, detailed design work should be undertaken prior to final submission of the Aberdeen LEZ Option to Scottish Ministers that will include aspects such as signage and camera placement and will present a further opportunity to finalise the LEZ boundary. It is anticipated that through the final consultation, locations, accesses or land uses may be identified and require consideration of whether they fall inside or outside the LEZ area.

8.2.3 A list of all roads which form part of the zone, as required by the Transport (Scotland) Act 2019 are included in Appendix C of the second Interim NLEF Stage 2 Assessment Report (*Aberdeen Low Emission Zone, National Low Emission Framework 2nd Interim Stage 2 Report, SYSTRA May 2021*).

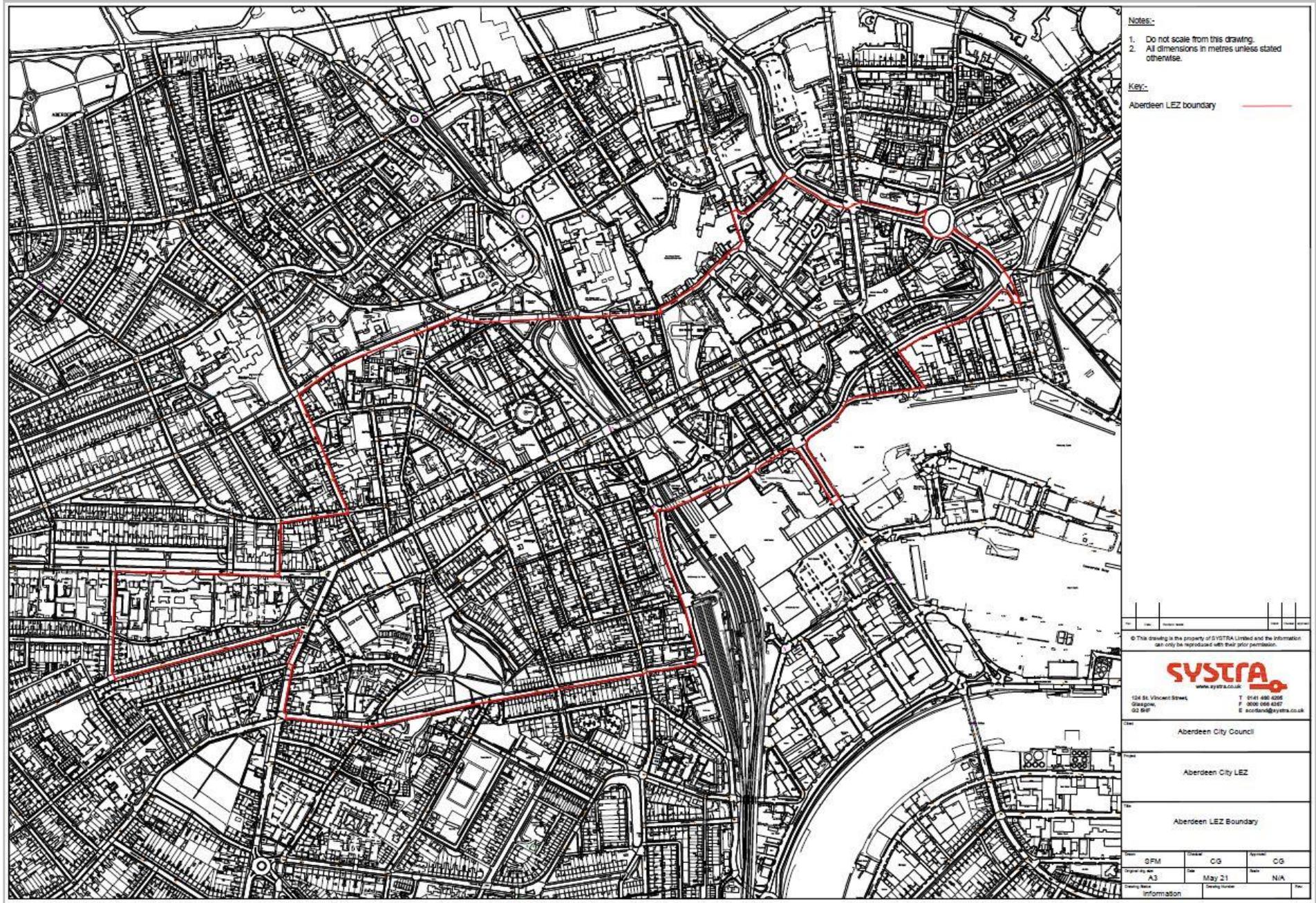


Figure 8.1 : Aberdeen LEZ Option Area

8.3 Vehicles types restricted from entering Aberdeen LEZ

8.3.1 The [Low Emission Zones \(Emission Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#) sets the emission standards for entry to the LEZ without penalty and allows ACC to define which vehicle types are to be restricted from entering the LEZ area.

8.3.2 NLEF Guidance states “*all vehicle types should be considered for inclusion in a LEZ and be assessed as part of the NLEF appraisal process...a single vehicle type or a combination of vehicle types could be subject to the LEZ requirements*” (NLEF, 2019).

8.3.3 The final decision of the vehicles types restricted from entering Aberdeen’s LEZ is informed by NMF Aberdeen air quality modelling, traffic modelling and consultation outcomes as well as enforcement considerations.

8.3.4 Analysis of modelled emission by vehicle type in the NMF Aberdeen Air Quality Model (Chapter 4) concluded that a LEZ in Aberdeen will have to include all vehicle types and have to be delivered with traffic management measures if all exceedances of the air quality objectives are to be addressed.

8.3.5 The traffic modelling assessed LEZ options that restricted all vehicles (buses, diesel cars, HGVs, LGVs and petrol cars) from access to the city centre unless they were compliant with LEZ emission standards. All non-compliant buses, LGVs, taxis and HGVs were assumed to become compliant while non-compliant cars were assumed to remain on the road network and access the city centre by utilising car parks outside the LEZ area. The detailed modelling results show the road network operates with small increases to average journey distance travelled and average journey times. This impact is balanced against the significant predicated reductions in NO₂ levels and traffic flows inside the LEZ area as a result of the introduction of an all vehicle LEZ and complementary traffic management measures.

8.3.6 In addition to evidence from modelling, the wider messaging and publicising of the LEZ is simplified if vehicle restrictions apply to all vehicle types that do not meet LEZ emission standards. It is also noted that the three other cities in Scotland (Glasgow, Dundee and Edinburgh) plan to introduce a LEZ for all vehicles and introducing an all vehicle LEZ for Aberdeen would ensure consistency across the country.

It is proposed that the final Aberdeen LEZ Option applies to all vehicles types as specified in [Regulation 2](#) of the Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021.

8.3.7 The LEZ emission standards for Aberdeen LEZ are therefore:

- Euro VI emission standards for buses, coaches and heavy good vehicles with diesel engines, with retrofitted vehicles to this standard also being acceptable (Euro VI vehicle registrations from 2013)
- Minibuses, large vans, taxis and cars are set at the Euro 6 for diesel vehicles and Euro 4 for petrol vehicles (Euro 6 diesel vehicle registrations in 2015, Euro 4 petrol vehicles in 2006).
- Euro 3 for motorcycles and mopeds

8.3.8 Although the model analysis did not consider motorcycles or mopeds (as they are not generally represented in the traffic or air quality model) these are listed in Regulation 2 and are therefore considered applicable to the emissions standards for Aberdeen’s LEZ.

8.3.9 [Section 6\(4\)\(a\)](#) of the Transport (Scotland) Act 2019 set enforcement exemptions consistently across Scotland, with the national LEZ exemptions listed in [Regulation 3](#) of

the LEZ Regulations and outlined in Table 8.1. Aberdeen LEZ will operate in accordance with the exemption list.

Table 8.1 : National LEZ Exemptions

Vehicle type of classification	Description
Emergency Vehicles	For or in connection with the exercise of any function of: the Scottish Ambulance Service, the Scottish Fire and Rescue Service, Her Majesty's Coastguard, and the National Crime Agency.
Military Vehicles	Vehicles belonging to any of Her Majesty's forces; or used for the purposes of any of those forces
Vehicles of Historic Interest	Vehicles which are 30 years old or older, are no longer in production and historically preserved or maintained
Vehicles for Disabled Persons	Vehicles registered with a 'disabled' or 'disabled passenger vehicles' tax class Vehicles being used for the purposes of the 'Blue Badge Scheme'.
Showman Vehicles	Highly specialised vehicles used for the purposes of travelling showmen, where the vehicle is used during the performance, used for the purpose of providing the performance or used for carrying performance equipment.

8.4 Aberdeen LEZ Package of Measures

- 8.4.1 To enable the development of a package of measures to be delivered as part of the LEZ, traffic modelling was utilised to identify if any elements of the City Centre Masterplan (CCMP) not yet implemented would enhance and support the LEZ in meeting its objectives. The CCMP Union Street Scheme was shown to complement the proposed LEZ and is expected to positively impact on the NO₂ exceedance locations in the city. This combination of the LEZ plus CCMP Union Street Scheme is predicted to significantly reduce the emission levels at all the 2019 observed NO₂ exceedance locations, with the reduction anticipated to bring all locations within AQO limits.
- 8.4.2 The model testing of various proposals to manage traffic displaced from the city centre identified that a revision to the operation of the Milburn Street / South College Street junction is best placed to address potential rat runs through the south and west border of the LEZ. Junction changes are required to restrict or prevent strategic traffic (both compliant and non-compliant) routing through Milburn Street and the Ferryhill corridor. Further assessment of the specifics of these measures will be considered by ACC in due course.
- 8.4.3 It is therefore recommended that the LEZ, the CCMP Union Street Scheme and the Milburn Street junction revision is viewed as a combined package of measures to meet the objectives of the LEZ, as shown in Figure 8.2.

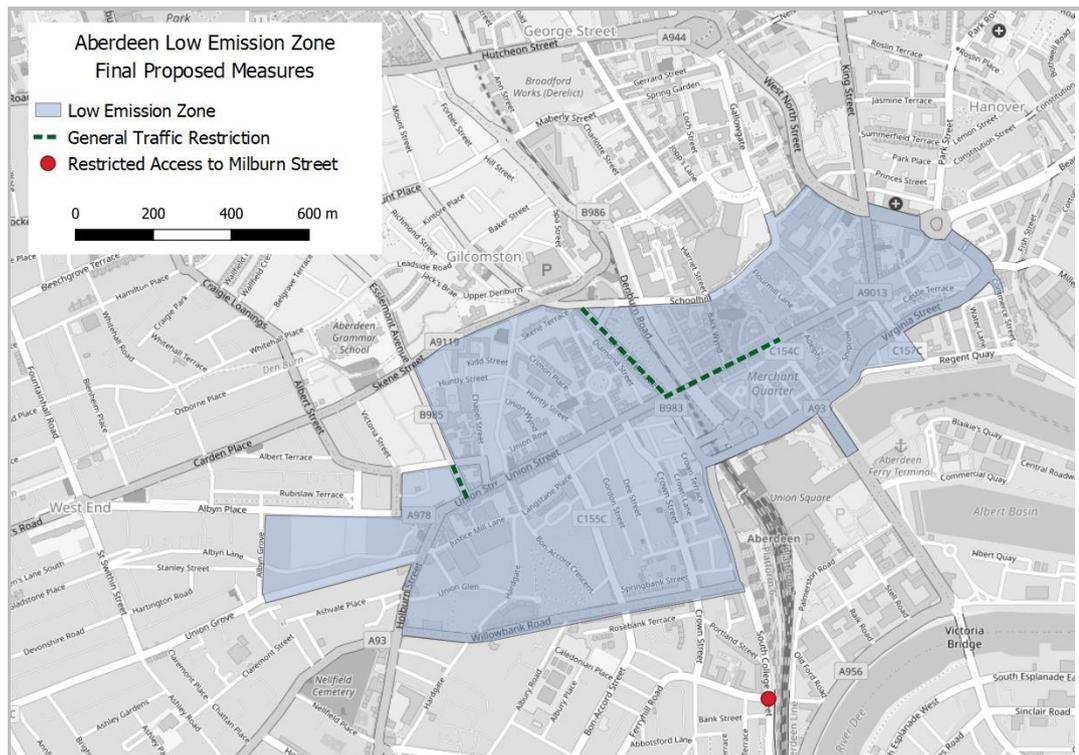


Figure 8.2 : LEZ Supporting Measures

8.5 Enforcement of Aberdeen LEZ

- 8.5.1 ACC will submit its final proposals for the LEZ to Scottish Ministers in late 2021 and, subject to any objection, is required to declare its LEZ by May 2022. While a decision on the final exact date is made, the working assumption for this Interim Stage 2 Report is that ACC will declare the LEZ in May 2022, and that the LEZ will apply to all vehicle types (not meeting LEZ standards) from this date.
- 8.5.2 The Transport (Scotland) Act 2019 requires a LEZ to specify a grace period before penalty enforcement of the scheme. [Section 15](#) details the scope and time-limits of the grace period. The grace period applicable to non-residents must expire:
- not less than 1 year after it (LEZ declaration) begins, and
 - not more than 4 years after it begins.
- 8.5.3 The grace period applicable to residents (whose registered address is inside the zone) must expire not more than 2 years after the expiry of the grace period applicable to non-residents.
- 8.5.4 With declaration of Aberdeen’s LEZ in May 2022, the grace period for the LEZ must therefore:
- Not expire before May 2023
 - Expire by May 2026 for non-residents
 - Expire by May 2028 for residents but can expire from May 2023.
- 8.5.5 To inform the grace period dates, consultation with two key stakeholders, namely bus operators and the business community, was undertaken in March 2021. All bus operators confirmed their full fleet would not be compliant with LEZ emission standards by 2023, the minimum grace period. While a key purpose of any LEZ is to speed up improvements to air quality (through compliance with emission standards) and ACC could enforce the LEZ in 2023, it is considered counter-productive to set a date that bus operators will be unable to meet.

8.5.6 In addition, it is recognised that the Covid-19 pandemic has had an unprecedented impact on society, including on the wider environment and the economy. Cognisance of the difficulties faced by many throughout 2020 and 2021, particularly in the context of a Aberdeen city centre LEZ and its implications for city businesses and bus operators, suggests that a grace period greater than the required minimum is desirable.

8.5.7 A key theme from consultation with key stakeholders was the need for consistency of the grace periods applied to the LEZ enforcement. It is therefore considered important that the grace period should be applicable to all vehicle types from the same date to ensure consistency and ease of enforcement and wider communications. In line with the theme of consistency, it is proposed that residents of the LEZ area are required to comply with the LEZ emission requirements at the same time as non-residents.

With the above considerations in mind, it is proposed that the grace period for Aberdeen's LEZ expires in May 2024 for all vehicle types and for residents and non-residents of the zone.

8.5.8 This represents an additional grace period of two year from the declaration of the LEZ in May 2022.

8.5.9 As context, in May 2024, the approximate age of non-compliant vehicles will be as follows:

- Bus – 11 years or older (including those retrofitted to Euro VI standard)
- HGV – 11 years or older
- Diesel car/van – 9 years or older
- Petrol vehicle – 18 years or older

8.5.10 [Section 8](#) of the Transport (Scotland) Act 2019 enables the enforcement of LEZ schemes. The LEZ will be enforced through Automatic Number Plate Recognition (ANPR) cameras with the LEZ Regulations [Schedule 6](#) detailing the approved devices.

8.5.11 ANPR camera enforcement is currently subject to funding decisions from Transport Scotland and procurement procedures with suppliers. The exact number and location of ANPR cameras is therefore not concluded and will be confirmed in the final NLEF Stage 2 Report and submission to Scottish Ministers.

8.5.12 In line with [Section 18](#) of the Transport (Scotland) Act 2019, it is anticipated that the LEZ will be enforced at all times. [Section 17](#) of the Act does allow for ACC to apply time-limited exemptions to enforcement should it be required, for example for road closures and diversion routes.

9. SUMMARY OF NEXT STEPS

9.1 Timetable of Aberdeen LEZ

9.1.1 Table 9.1 below presents the proposed timetable from committee submission of the final Aberdeen LEZ presented in the second Interim NLEF Stage 2 Report through to full enforcement of the LEZ after the proposed grace period ends.

Table 9.1 : Timetable towards Aberdeen LEZ enforcement

Activity	Indicative Date
City Growth and Resources Committee Report recommending final Aberdeen LEZ as defined in this report	June 2021
Statutory Consultation	Summer 2021
Completion of additional impact assessments (IIA, BRIA, SEA)	Autumn 2021
Submission of final LEZ scheme to Scottish Ministers	End 2021
Scottish Minister approval and ACC declaration of Aberdeen LEZ	Spring 2022
Enforcement of Aberdeen LEZ	Spring 2024

9.2 Emissions Analysis and the National Modelling Framework

9.2.1 SEPA, who develop and run the National Modelling Framework (NMF) Aberdeen City Air Quality Model, were subject to a cyber-attack in late 2020 resulting in the NMF being temporarily unavailable, with model runs not possible prior to completion of this second Interim NLEF Stage 2 Report. The final Aberdeen LEZ option will however be assessed in the NMF prior to submission to Scottish Ministers (late 2021 as noted above).

9.2.2 As an interim step to inform the likely impact on emissions resulting from the introduction of the LEZ, analysis of emissions based on traffic model outputs using EMIT software is currently being undertaken by SEPA and findings will be incorporated in the NLEF process as available.

9.3 Impact Assessments

9.3.1 NLEF guidance advises that as part of the NLEF Stage 2 Assessment, the final Aberdeen LEZ should be subject to detailed impact, equality and environmental assessments to ensure any impacts, beyond improvements to air quality, are fully considered.

9.3.2 In line with Transport Scotland's approach to the national introduction of LEZs, Aberdeen's LEZ will be subject to the following impact assessments:

- Strategic Environmental Assessment (SEA)
- Integrated Impact Assessment (IIA)
- Business and Regulatory Impact Assessment (BRIA).

9.3.3 These assessments are ongoing and it is anticipated that these tasks will be complete prior to the final submission of the Aberdeen LEZ to Scottish Ministers in Autumn 2021.

9.4 Statutory Consultation

9.4.1 [Section 11](#) of the Transport (Scotland) Act 2019 states that before a local authority submits its final LEZ proposals to Scottish Ministers for approval, it must consult with:

- the Scottish Environment Protection Agency,
- Scottish Natural Heritage (now NatureScot),
- Historic Environment Scotland,
- such persons as the authority considers represent the interests of—
 - i. the road haulage industry,
 - ii. the bus and coach industry,
 - iii. the taxi and private hire car industry,
 - iv. local businesses, and
 - v. drivers, likely to be affected by the proposal,
- such persons as are specified by the Scottish Ministers in regulations
 - i. neighbouring local authorities
 - ii. the Regional Transport Partnership (Nestrans)
 - iii. the local Health Board
- such other persons as the authority considers appropriate.

9.4.2 All statutory consultees have been involved in previous consultation and/or are part of the Aberdeen LEZ Delivery Group. However, in line with The Transport (Scotland) Act 2019, consultation on the final Aberdeen LEZ will take place from June 2021. Thereafter, ACC will publish a Report on the consultation findings and, if required, take account of any representations received in the course of the consultation.

9.4.3 Once the consultation findings have been taken into consideration, ACC will publish the final proposed Aberdeen LEZ scheme and, at this time, objections can be made. When the period in which objections can be made has ceased, ACC will publish a report outlining any objections received and its response, prior to submission to Scottish Ministers in late 2021.