

## REPORT TO INFRASTRUCTURE SERVICES COMMITTEE – 19 AUGUST 2021

### ABERDEEN CITY LOW EMISSIONS ZONE - CONSULTATION

#### 1 Reason for Report/Summary

- 1.1 Aberdeen City Council are consulting on the introduction of a Low Emissions Zone in Aberdeen City Centre. The effect will be to limit access to vehicles failing to meet pre-set limits for emissions. The consultation is on the proposed boundaries and other details for the operation of the zone. It is proposed that Aberdeenshire Council submit a response to the consultation.

#### 2 Recommendations

**The Committee is recommended to:**

- 2.1 Consider the proposals for a Low Emissions Zone in Aberdeen as set out in the consultation document in Appendix 1;**
- 2.2 Consider and comment on the draft consultation response in Appendix 3; and**
- 2.3 Delegate authority to the Director of Infrastructure Service to submit the finalised consultation response to Aberdeen City Council by 22 August 2021, following consultation with the Chair, Vice Chair and Opposition Spokesperson.**

#### 3 Purpose and Decision Making Route

- 3.1 The purpose of this report is to make members aware of the proposed Low Emissions Zone in Aberdeen City and to seek comments for a response to the public consultation.
- 3.2 The Low Emission Zone proposals are subject to approval by Scottish Ministers and the consultation comments will be reported back to Aberdeen City Council's City Growth and Resources Committee for consideration prior to moving to implement the Low Emissions Zone scheme.

#### 4 Discussion

- 4.1 On 30 June 2021 Aberdeen City Council approved a proposed scheme for the introduction of a Low Emissions Zone in the Aberdeen City Centre.
- 4.2 The introduction of Low Emissions Zone's in Scotland's 4 largest cities was a key part of the Transport (Scotland) Act 2019 and is intended to improve air quality in city centres where there are regular exceedances of acceptable limits of noxious air pollutants.

- 4.3 A Low Emission Zone is an area where only motorised vehicles which have engine types which meet pre-set emissions criteria may enter. Enforcement is via Automatic Number Plate Recognition cameras using the DVLA database to determine if a vehicle complies with the emissions limits regulations. Fines are levied on non-compliant vehicles which enter the zones.
- 4.4 **Appendix 1** sets out the proposed scheme in more detail and **Appendix 2** is an enlarged plan of the proposed Low Emissions Zone boundary. **Appendix 3** contains a draft consultation response for discussion.
- 4.5 Officers from Aberdeenshire Council have been part of the Aberdeen City Low Emissions Zone project steering group and have provided input into the proposals. The Committee has previously been appraised of the Low Emissions Zone proposals in the quarterly Strategic Transport Update reports. The Council, through its response to the Nestrans Regional Transport Strategy and its Climate Change commitments, has broadly supported the introduction of a Low Emissions Zone within the City, which is a statutory expectation under the Transport (Scotland) Act 2019.
- 4.6 It is proposed that the Council submits a response to the proposed Low Emissions Zone with some specific comments on the location of the boundaries of the Zone where it is felt that some issues may be caused for vehicles, notably HGVs, accessing the harbour area, particularly from the north.
- 4.7 A draft consultation response is attached as **Appendix 3** and it is recommended that this Committee consider and comment on the draft response and agree for the submission of the final response be delegated to the Director of Infrastructure Services, following consultation with the Chair, Vice Chair and Opposition Spokesperson.

## 5 Council Priorities, Implications and Risk

- 5.1 This report supports the Infrastructure and Resilient Communities Priorities within the Pillar of Our Environment.
- 5.2 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial		X	
Staffing		X	
Equalities and Fairer Duty Scotland			X
Children and Young People's Rights and Wellbeing			X

Subject	Yes	No	N/A
Climate Change and Sustainability			X
Health and Wellbeing			X
Town Centre First			X

- 5.3 An integrated impact assessment is not required as the Committee is being asked to consider a consultation response to an external body, namely Aberdeen City Council. The proposed policy being consulted has been subject to the City's own equalities and fairness assessment processes.
- 5.4 There are no staffing implications associated with the proposals. Aberdeenshire officers continue to engage with Aberdeen City Council officials in respect of the proposed Low Emissions Zone as part of their overall duties.
- 5.5 There are no direct financial implications with the recommendation of this report. However, there are potential financial implications in the proposed Low Emissions Zone. It is unlikely that Aberdeenshire Council vehicles will have a requirement to enter the Low Emissions Zone but we would have to be mindful of compliance of any vehicle in the scenario that required accessing Low Emissions Zone. There are potential financial implications to the Council in terms of cross-boundary supported bus services which have been costed by the operator on the basis of Euro IV or V rated vehicles. In such a situation, the company may seek a contract price increase to deploy Euro VI or better vehicles to comply with the Low Emissions Zone or instigate the break clause in the contract with higher prices received on re-tender. It is estimated that if this is the case, relevant contract prices could increase by approximately 15-25%, amounting to additional bus service support costs of the order of £85,000 per annum in the short term, until operator fleets achieve 100% Euro VI or better compliance.
- 5.6 There are no risks identified in terms of the Corporate or Directorate Risk Registers.

## 6 Scheme of Governance

- 6.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report and are satisfied that the report complies with the Scheme of Governance and relevant legislation.
- 6.2 The Committee is able to consider and take a decision on this item in terms of Section F 3.2 of the [List of Committee Powers in Part 2A](#) of the Scheme of Governance as it relates to a consultation response within the Committee's policy area.

**Alan Wood**  
**Director of Infrastructure Services**

Report prepared by Martin Hall, Strategy Manager  
4 August 2021

**List of Appendices**

Appendix 1 – Aberdeen City Council Proposed Low Emissions Zone Consultation

Appendix 2 – Enlarged Plan of Proposed LEZ Boundary

Appendix 3 – Draft Aberdeenshire Council Consultation Response

## **Appendix 1**

### **Proposal to make a LEZ Scheme – Aberdeen City Council**

#### **1 Introduction**

Under the powers granted by the [Transport \(Scotland\) Act 2019](#), and in accordance with [The Low Emission Zones \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#) and [The Low Emission Zones \(Scotland\) Regulations 2021](#), Aberdeen City Council (ACC) proposes to introduce a Low Emission Zone (LEZ) in Aberdeen.

#### **2 Statement of Reasons**

ACC believes a LEZ is required and is an appropriate response to longstanding issues of poor air quality in the Aberdeen City Centre Air Quality Management Area (AQMA) for the following reasons:

- Air pollution is believed to be a contributing factor in a number of serious health problems suffered by individuals and the number of health concerns linked to poor air quality is growing every day. This has a disproportionate impact on the most vulnerable members of society, particularly the young, the elderly and those with chronic heart, lung and respiratory conditions. Air pollution is therefore a significant Public Health concern and a LEZ is one of the most effective ways of responding to this;
- Although pollution levels have been reducing in Aberdeen in recent years and since the publication of Aberdeen's Air Quality Action Plan in 2011, in many City Centre locations monitoring stations still show regular exceedance or near exceedance of the Scottish Government's annual mean Nitrogen Dioxide (NO<sub>2</sub>) objective. This can be seen in the map below where the red dots show exceedances of legal air quality levels and the amber dots show levels close to exceedance in 2019. As most of the exceedance locations are along busy roads, it is clear road traffic is the main source of pollution.

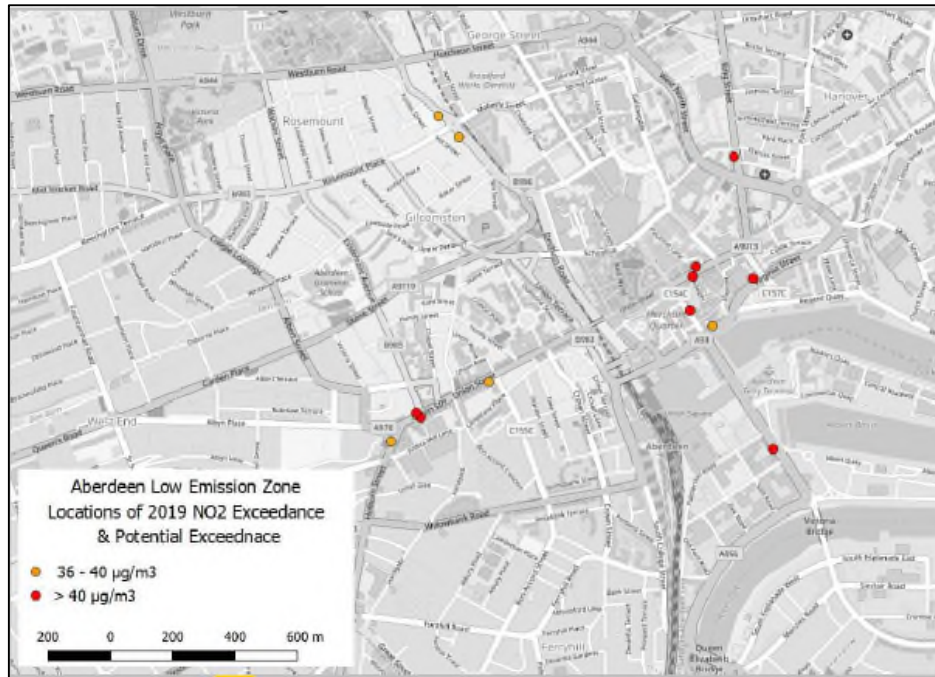


Figure 1: Locations of NO<sub>2</sub> exceedance and near-exceedance in Aberdeen City Centre

- While the opening of the Aberdeen Western Peripheral Route (AWPR) in 2019 has reduced traffic levels within the City, the impact on emissions in the City Centre has not been so great that all air quality objectives are being met;
- Air Quality modelling has shown that, even with the delivery of ambitious transport improvements in the City Centre, such as those identified in the Aberdeen City Centre Masterplan, emissions exceedances will remain unless tailpipe emissions are also addressed;
- While the COVID-19 pandemic and resulting travel restrictions have positively impacted on air quality in the short term, the medium to long term impacts on transport and travel remain uncertain, therefore the pandemic should not be a reason for delaying action. Indeed, monitoring undertaken by ACC throughout the pandemic has shown that, as restrictions on movement ease, traffic levels slowly rise again to near pre-pandemic levels. It would take a significant and sustained long-term decrease in traffic for a LEZ to no longer be necessary in the City Centre. Scenario Planning has been undertaken, looking at the impacts of a LEZ on a range of plausible post-COVID scenarios. Although the impacts of a LEZ vary between scenarios, it is clear that a LEZ will reduce pollution and protect the City Centre in all scenarios;
- As well as the Public Health benefits, ACC believes that there are wider benefits to improving air quality, in terms of making Aberdeen and the City Centre safe, desirable and welcoming environments for living, working, shopping and leisure. In this regard, we anticipate the LEZ will support economic recovery and city centre regeneration as we emerge from the COVID-19 pandemic;

- The LEZ supports and contributes to national, regional and local plans and policies, which seek to reduce unnecessary traffic, encourage modal shift to sustainable transport, and reduce transport's impact on the environment. In this regard, the LEZ is fully compliant with the aims and objectives of Scotland's National Transport Strategy, the Nestrans Regional Transport Strategy, the Aberdeen Local Transport Strategy, the Cleaner Air for Scotland Strategy, Aberdeen's Air Quality Action Plan, and the Aberdeen City Centre Masterplan and supporting Sustainable Urban Mobility Plan. Transport changes engendered by the LEZ may also contribute to meeting national and local net-zero carbon aspirations;
- The proposed LEZ has been subject to a robust option appraisal process which has included public and stakeholder engagement, traffic microsimulation modelling, sensitivity testing against various future scenarios, and emissions analysis. This process, which has culminated in the identification of the preferred LEZ option, is described in detail within the 'National Low Emission Framework - Interim Stage 2 report'.

### **3 LEZ Objectives**

The following objectives for the LEZ have been agreed by ACC.

- Primary Objectives:
  - Improve air quality in Aberdeen by reducing harmful emissions from transport and delivering on the Scottish Government's statutory air quality objectives (prescribed under section 87(1) of the Environment Act 1995);
  - Support climate change targets (as set out in Part 1 of the Climate Change (Scotland) Act 2009) by reducing road transport's contribution to emissions.
- Secondary objectives:
  - 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.

### **4 Proposed LEZ Boundary**

A map of the proposed LEZ boundary is shown in Figure 2 below.

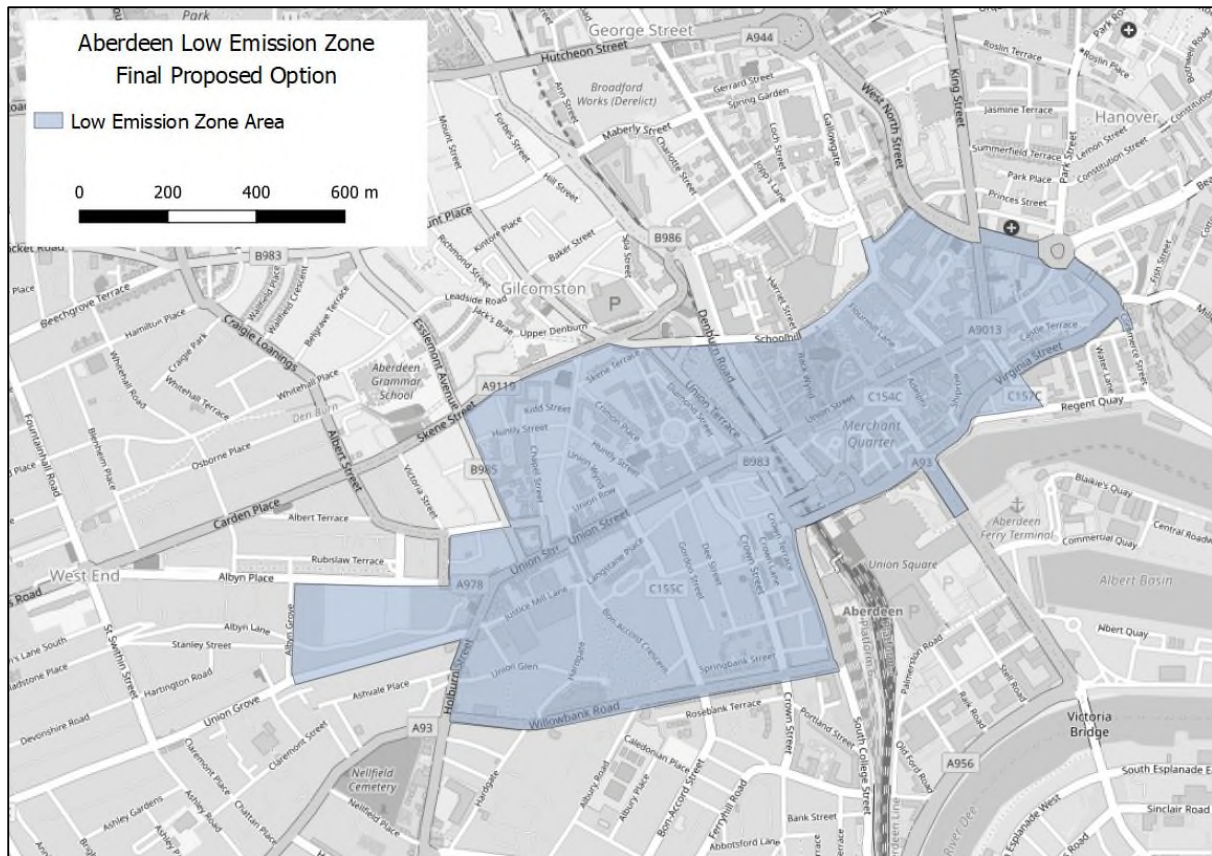


Figure 2: Proposed LEZ

A list of roads falling within the proposed LEZ area are provided in Table 1 below.

Table 1 : Schedule of Streets within Proposed LEZ

Roads within LEZ Boundary	Detail
Academy Street	Full length
Adelphi	Full length
Affleck Place	Full length
Affleck Street	Full length
Albany Court	Full length
Albyn Lane	From Albyn Grove Junction to end of lane by Holburn Street
Albyn Place	From Albyn Place Junction to Albyn Place Junction (semi crescent by Harlaw Academy)
Alford Place	Full length
Back Wynd	Full length
Bath Street	Full length
Belmont Street	Full length
Board Street	Full length
Bom-Accord Crescent	Full length
Bom-Accord Crescent Lane	Full length
Bon-Accord Lane	Full length



Bon-Accord Square	Full length
Bon-Accord Street	Full length
Bon-Accord Terrace	Full length
Bridge Place	Full length
Bridge Street	Full length
Carmelite Lane	Full length
Carmelite St	Full length
Castle Street	Full length
Castle Terrace	Full length
Castlehill	Full length
Chapel Street	Full length
College Street	From Windmill Brae Junction to Wapping Street
Commerce Street	From Beach Boulevard Roundabout to Mearns Street Junction
Concert Court	Full length
Correction Wynd	Full length
Craibstone Lane	Full length
Crimon Place	Full length
Crown Lane	Full length
Crown Street	Full length
Crown Terrace	Full length
Dee Place	Full length
Dee Street	Full length
Denburn Road	Full length
Diamond Lane	Full length
Diamond Place	Full length
Diamond Street	Full length
East Craibstone Street	Full length
East Green	Full length
East North Street	Full length
Exchange Lane	Full length
Exchange Street	Full length
Flourmill Lane	Full length
Gaelic Lane	Full length
Gallowgate	From Upperkirkgate Junction to Littlejohn Street Junction
Gilcomstoun Court	Full length
Golden Square	Full length
Gordon Street	Full length
Guild Street	Full length
Hadden Street	Full length
Hardgate	Full length
Holburn Street	From Union Street Junction to Ashvale Place Junction
Huntly Street	Full length

Imperial Place	Full length
Justice Mill Brae	Full length
Justice Mill Lane	Full length
Justice Street	Full length
Kidd Street	Full length
King Street	From Marischal Street Junction to West North Street Junction
Langstane Place	Full length
Lindsay Street	Full length
Little Belmont Street	Full length
Little Chapel Street	Full length
Littlejohn Street	Full length
Marischal Street	Full length
Market Street	From Union Street Junction to Union Square bus station
Market Stance	Full length
Marywell Street	Full length
Minister Lane	Full length
North Silver Street	Full length
Netherkirkgate	Full length
Oldmill Road	Full length
Peacock's Close	Full length
Poultry Market Lane	Full length
Queen Street	Full length
Rennie's Court	Full length
Rennie's Wynd	Full length
Rose Place	Full length
Rose Street	From Thistle Street Junction to Union Street Junction
Ruby Lane	Full length
Ruby Place	Full length
South Silver Street	Full length
Schoolhill	From Upperkirkgate to Back Wynd Junction
Shiprow	Full length
Shoe Lane	Full length
Shore Brae	Full length
Shore Lane	Full length
Skene Terrace	Full length
Springbank Street	Full length
Springbank Terrace	Full length
St John's Place	Full length
St Mary's Place	Full length
St Nicholas Lane	Full length
St Nicholas Street	Full length
Stirling Street	Full length

Strawberry Bank Parade	Full length
Summer Street	Full length
The Green	Full length
Theatre Lane	Full length
Thistle Place	Full length
Thistle Street	From Rose Street Junction to Chapel Street Junction
Trinity Lane	Full length
Trinity Quay	Full length
Trinity Street	Full length
Union Bridge	Full length
Union Glen	From Holburn Street Junction to Bon Accord Gardens
Union Glen Court	Full length
Union Grove	From Albyn Grove Junction to Holburn Street Junction
Union Row	Full length
Union Street	Full length
Union Terrace	Full length
Union Wynd	Full length
Uppr Kirkgate	Full length
Virginia Court	Full length
Virginia Street	Full length
W Craibstone Street	Full length
Wapping Street	Full length
Weigh-House Square	Full length
Whitehouse Street	Full length
Willowbank Road	Full length
Willowgate Close	Full length
Windmill Brae	Full length
Windmill Lane	Full length

The option being proposed is considered by ACC and delivery partners as the optimum LEZ for Aberdeen following option appraisal in accordance with the National Low Emission Framework (NLEF) and Scottish Transport Appraisal Guidance (STAG). This has encompassed:

- Identification of a longlist of possible LEZ options which were sifted into a manageable number of realistic options for appraisal;
- Ongoing and iterative sifting and appraisal of options against a range of criteria, supplemented by traffic and air quality modelling; and
- Public and stakeholder engagement on options to understand the likely impacts on residents and businesses.

The option being proposed is the one that, upon completion of the above processes, is considered feasible and deliverable and has been shown to strike the most appropriate balance between maximising the air quality and public health benefits and minimising disbenefits, in terms of traffic displacement and impacts on local residents

and businesses. Based on previous consultation it is also anticipated that this option will have a reasonably high degree of public acceptability compared to other options previously consulted upon.

The traffic and air quality modelling suggests that, even with the LEZ in place, some areas of pollution will remain unless further traffic reduction measures are introduced, therefore it is likely that the LEZ will be accompanied by changes to roads in the city centre to prioritise people walking, wheeling, cycling and using public transport.

The modelling also suggests that the LEZ may cause traffic increases on certain streets to the south and west of the zone that are not suitable for such an increase. The LEZ will also therefore require access restrictions to and from Millburn Street at its junction with South College Street / Palmerston Place to mitigate these impacts.

The full option appraisal process that has culminated in the identification of the preferred option is described in detailed within the Interim NLEF Stage 2 report, which is available to view alongside the consultation materials.

## **5 Introduction Date and Grace Period**

It is ACC's intention to introduce the LEZ on 30th May 2022.

A 2-year grace period (during which enforcement of the LEZ will not take place) is proposed for both residents and non-residents of the LEZ area and for all non-exempt vehicle types, meaning enforcement will commence on 30th May 2024.

The decision to apply a 2-year grace period has been informed by feedback obtained through previous consultation and stakeholder engagement as to how quickly those affected by the introduction of the LEZ may become compliant. In addition, the unprecedented impact of the COVID-19 pandemic on society, including the wider environment and economy, needs to be considered. Potential implications for city centre businesses and bus operators suggests that a grace period greater than the required 1 year minimum is appropriate. The 2-year grace period would be applicable to all vehicle types from the same date to ensure consistency and ease of enforcement and wider communications. No additional grace period for residents of the zone is proposed.

## **6 Hours of Operation**

It is proposed that the LEZ operates for 365 days a year, 24 hours a day. The legislation allows for the LEZ to be suspended for the duration of events of local or national significance. These will be determined on a case by case basis but could include events such as the Winter Festival. The LEZ can also be suspended in emergency situations, such as an incident on the wider road network that requires all vehicles to be temporarily diverted through the LEZ area (but only where vehicles follow prescribed diversionary routes).

## **7 LEZ Scope**

The LEZ will apply to all vehicle types specified in the table below, unless subject to an exemption (see section 8):

Table 2: Vehicle types within scope of the LEZ

Vehicle	Vehicle Category	Description
Light passenger vehicles	M1	Vehicles designed and constructed for the carriage of passengers and comprising no more than eight seats in addition to the driver's seat.
Minibus	M2	Vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass not exceeding 5 tonnes.
Bus and coach	M3	Vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass exceeding 5 tonnes.
Light Goods Vehicles (LGVs)	N1	Vehicles designed and constructed for the carriage of goods and having a maximum mass not exceeding 3.5 tonnes.
Heavy Goods Vehicles (HGVs)	N2	Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 3.5 tonnes but not exceeding 12 tonnes.
	N3	Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 12 tonnes.

Vehicles will be permitted access to LEZs on the basis of their exhaust emissions standard. Mandatory nationally consistent emission standards for Scottish LEZs have been set for virtually all petrol and diesel vehicle classifications (e.g. buses, taxis, vans, HGVs, cars, motorcycles) within [The Low Emission Zones \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#)). These are shown in Tables 3 and 4.

Table 3: LEZ emission standard for compression ignition (diesel) engines

Vehicle category	Emission standards	Euro Categories
Heavy-duty vehicles (e.g. HGVs and buses/coaches)	Euro VI	M2, M3, N2, N3
Light passenger and light goods vehicles	Euro 6	M1, M2, M3, N1, N2
Special category vehicles: <ul style="list-style-type: none"> <li>an ambulance (which is not exempt under the Regulations);</li> <li>a hearse;</li> <li>a motor caravan.</li> </ul>	Euro 6	M1, M2, M3

Table 4: LEZ emission standard For positive ignition (petrol and gas) engines

Vehicle category	Emission standards	Euro Categories
Heavy-duty vehicles (e.g. HGVs and buses/coaches)	Euro IV	M2, M3, N2, N3
Light passenger and light goods vehicles	Euro 4	M1, M2, N1, N2
Special category vehicles: <ul style="list-style-type: none"> <li>an ambulance (which is not exempt under the Regulations);</li> <li>a hearse;</li> <li>a motor caravan.</li> </ul>	Euro 4	M1, M2, M3

Vehicles can be retrofitted with emission abatement technology to improve emissions. Suitably certified retrofitted or repowered vehicles - where the emission standards are confirmed to a Euro 6/VI standard equivalent - will also be LEZ compliant.

Aberdeen's LEZ will not apply to motorcycles and mopeds given the limited contribution these make to NO<sub>2</sub> emissions.

## 8 Exemptions

As identified in [The Low Emission Zones \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#), a number of vehicle types will be exempt from LEZs in Scotland, meaning that any restrictions will not apply to them.

Table 5: National Exemptions

Vehicle type or classification	Description
Emergency vehicles	<p>The vehicle is being driven by any person who is:</p> <ul style="list-style-type: none"> <li>undertaking their duty as a constable;</li> <li>providing a response to an emergency at the request of the Scottish Ambulance Service Board;</li> <li>exercising the functions of the Scottish Ambulance Service Board, the Scottish Fire and Rescue Service, Her Majesty's Coastguard or the National Crime Agency.</li> </ul>
Naval, military or air force vehicles	<ul style="list-style-type: none"> <li>Vehicles being used for naval, military or air force purposes.</li> </ul>
Historic vehicles	<ul style="list-style-type: none"> <li>The vehicle was manufactured or registered under the Vehicle Excise and Registration Act 1994 for the first time at least 30 years ago;</li> <li>The vehicle is no longer in production; and</li> <li>The vehicle has been historically preserved or maintained in its original state and has not undergone substantial changes in the technical characteristics of its main components.</li> </ul>
Vehicles for disabled persons	<ul style="list-style-type: none"> <li>The vehicle is being driven by any person who is in receipt of a badge (a blue badge) that has been issued under Section 21(2) of the Chronically Sick and Disabled Persons Act 1970,</li> <li>a passenger in the vehicle has been issued with a badge under that Section of that Act; or</li> <li>a badge for the vehicle has been issued under Section 21(4) of that Act; or</li> <li>a reduction in annual rate of vehicle excise duty applies because the vehicle is being used by a disabled person in receipt of personal independence payment at the standard rate; or</li> <li>Vehicles registered with a 'disabled' or 'disabled passenger vehicles' tax class e.g. the vehicle is exempt from payment of vehicle excise duty under paragraph 19(1) or 20(1) of schedule 2 of the Vehicle Excise and Registration Act 1994 (exemptions from excise duty for vehicles used by disabled persons).</li> </ul>
Showman vehicles	<ul style="list-style-type: none"> <li>Vehicles described as either "showman's goods vehicle" or "showman's vehicle" according to Section 62(1) of the Vehicle Excise and Registration Act 1994. Note: these are 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.</li> </ul>

\* Note: blue badges are assigned to a person, not a vehicle, so a blue badge holder could travel in any vehicle and the rules of the blue badge would be applied to that vehicle on that day of travel.

ACC can also grant and renew time-limited exemptions to any vehicle type that is not covered by a national exemption, meaning the registered keeper of the vehicle would be exempt from LEZ enforcement for the period of time that the exemption applies. Such exemptions are likely to only be granted in exceptional circumstances where it can be clearly demonstrated that

vehicle operators or groups are doing all they can to comply with the LEZ but may require longer time than the agreed grace period. There are no exemptions proposed at the moment, although there may be examples raised during consultation that ACC will consider prior to making final proposals.

## 9 Penalty Charges and Surcharges

Should ACC believe a vehicle is in contravention of the LEZ, it will serve a Penalty Charge Notice (PCN) on the registered keeper.

The default penalty charges for LEZs are set in [Schedule 4 of the Low Emission Zones \(Emissions Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#) and therefore are consistent across all of Scotland.

The initial penalty charge for all non-compliant vehicles is set at £60, reduced by 50% if it is paid within 14 days. The penalty amount doubles with each subsequent breach of the rules detected in the same LEZ. The penalty charges are capped at £480 for cars and light goods vehicles and £960 for buses and HGVs. Where there are no further breaches of the rules detected within the 90 days following a previous violation, the penalty is reset to the base tier of charge i.e. £60.

Table 6 – LEZ Penalty Rates and Surcharges

Vehicle category	Initial Penalty Charge	Subsequent Penalty Charges			
	1	2	3	4	5
Light passenger vehicle	£60	£120	£240	£480	
Minibus	£60	£120	£240	£480	£960
Bus and coach	£60	£120	£240	£480	£960
Light goods vehicles	£60	£120	£240	£480	
Heavy goods vehicle	£60	£120	£240	£480	£960
Special Purpose Vehicles	£60	£120	£240	£480	

Enforcement will commence following the end of the 2-year grace period and will be via Automatic Number Plate Recognition (ANPR) cameras.

## 10 Representations and Next Steps

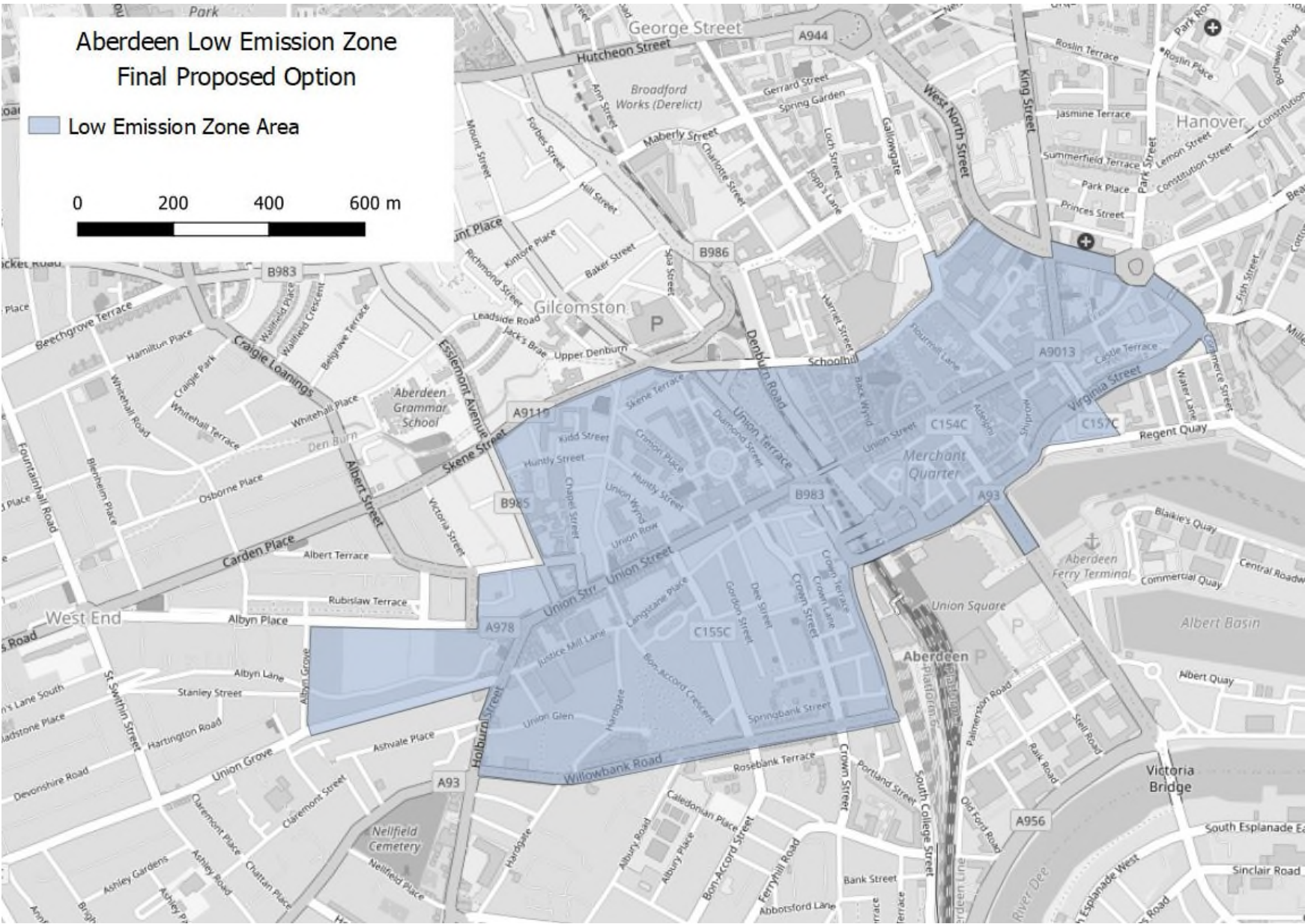
ACC is now inviting responses to our LEZ proposals. A consultation period will run from 28<sup>th</sup> June to 22<sup>nd</sup> August 2021. Those wishing to respond can:

- Submit a response via the online consultation page: <https://consultation.aberdeencity.gov.uk/planning/lowemissionzone>;
- Email a response to [transportstrategy@aberdeencity.gov.uk](mailto:transportstrategy@aberdeencity.gov.uk); or
- Submit a written response to: Transport Strategy and Programmes, Aberdeen City Council, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB

Responses received will help inform the final LEZ scheme submitted to Scottish Ministers later in the year.



Appendix 2



## Appendix 3

### Draft Consultation Response on behalf of Aberdeenshire Council to Aberdeen City Council's Proposed Low Emissions Zone.

**1. Are you responding to this questionnaire as an individual or on behalf of an organisation?**

Organisation

**5. What is the name of your organisation?**

Aberdeenshire Council

**6. Which of the following statements is true for your organisation (please select all that apply)?**

Other

**Please expand upon your answer in the box below:**

Aberdeenshire Council is responding on behalf of and in the interests of its residents and businesses in the area as a democratically elected representative body. In addition, Aberdeenshire Council are currently in various contracts with bus operators to provide supported bus services from Aberdeenshire to Aberdeen, therefore there is a potential for impact on those services.

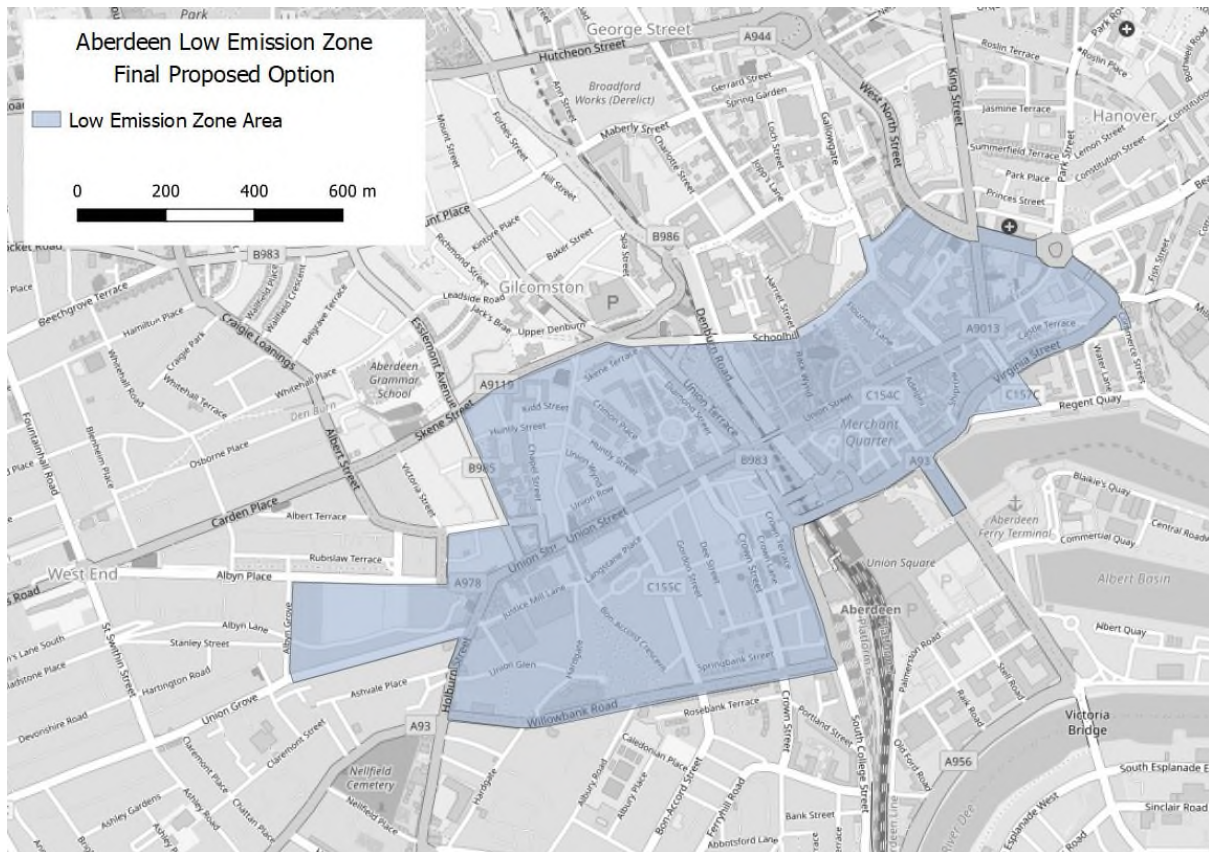
**7. Based on the information provided in the 'Proposal to make a LEZ scheme', on a scale of 1-5 (where 1 is very easy and 5 is very hard) how easy do you think it will be for your organisation to comply with the LEZ by 2024?**

3

**If you would like to expand upon your answer, please use the box below.**

Compliance is less of an issue for Aberdeenshire Council's own vehicles and perhaps more of an issue for those outwith the City who require access to the City Centre for employment and for the potential implications on out of town bus services.

## Proposed LEZ Area



### 8. Generally, are you in favour of a Low Emission Zone in Aberdeen?

Yes

If you would like to expand upon your answer, please use the box below.

Aberdeenshire Council recognises the expectation on the City Council set out by the Transport (Scotland) Act 2019. In addition, Aberdeenshire Council supports Aberdeen City Council in its ambition to improve air quality within the City Centre and the City Council's wider aspirations within its City Centre Masterplan.

### 9. Do you agree with the proposed LEZ boundary?

Please see below

If you would like to expand upon your answer, please use the box below.

In general, the proposed Low Emission Zone area is reasonable. However, there are potential issues with specific type of vehicles and access from the north.

The proposed scheme design area places restrictions on access between Aberdeen Harbour and the North which, as stated in the consultation aim, to reduce emissions on King Street. The proposal does not provide obviously suitable alternative routes for non-compliant vehicles to access the North Harbour area at all given the other neighbourhood restrictions either statutory (eg Golf Road width restriction) or suitability (residential etc) – an alternative design and consultation with identified stakeholders should be considered with routes for both the ordinary LCV and large HGV non-compliant vehicles clearly identified.

The impact of the proposed Low Emission Zone will be to increase mileage, average journey times and emissions for some journeys that non-compliant vehicles would make. These alternative routes would add a long diversion (approximately up to 20km) especially if restrictions on weight/width/height are factored in. It is unclear how and if any alternative routes would be robustly signed for both restricted and unrestricted non-compliant vehicles (and if there would then be an unintended pressure to break the less comprehensively monitored restrictions within Aberdeen City).

There would be an ongoing requirement for very large lifting and specialist vehicles to access Aberdeen harbour areas that are unlikely to be compliant by the introduction and may require exemptions if that were possible – having such vehicles conduct long diversions is not a suitable solution from emissions nor other perspectives.

**10. Do you agree with the proposed 2-year grace period until LEZ enforcement will commence?**

Yes

**If you would like to expand upon your answer, please use the box below.**

This would seem an appropriate and justifiable grace period.

**11. In your view, should any additional time-limited exemptions (in addition to the national exemptions described in the 'Proposal to make a LEZ scheme') be granted to any particular user group or class of vehicle?**

No

**If you answered yes, please provide details in the box below.**

Aberdeenshire Council agree that to be effective there needs to be a clear cut-off point for the introduction of the Low Emissions Zone accompanied by a lead-in period and appropriate publicity.