

National Low Emission Framework (NLEF) and Low Emission Zones

Stage 1 Screening Appraisal for The Highland Council

(extracted from [The Highland Council 2021 Annual Progress Report](#))

The [NLEF](#)

The NLEF is directly linked to Air Quality Action Planning (AQAP) for local authorities with Air Quality Management Areas (AQMAs) and will help to identify actions to improve local air quality within AQMAs. The NLEF appraisal takes the form of a two-stage process, as summarised in Table 1:

Table 1 – NLEF Appraisal Process

Stage		Outcome	Actions Required
1	Screening	<ul style="list-style-type: none"> • decision on whether to proceed to stage two assessment 	<ul style="list-style-type: none"> • screening process to identify actions that will benefit air quality within the AQMA • screening evidence should form part of the Annual Progress Report, with the decision agreed by Scottish Government and SEPA
2	Assessment	<ul style="list-style-type: none"> • decision to proceed with introduction of LEZ or identification of alternative transport-related measures required to improve air quality • Stage two assessment report agreed by Scottish Government and SEPA 	<ul style="list-style-type: none"> • NMF approach to support assessment of sources of pollution and options • quantitative impact assessment (based on predicted change in pollutant concentrations) • consideration of consequential impacts (e.g. congestion, export of pollution)

Our NLEF Stage 1 Screening Appraisal is detailed in Table 2. It is our opinion that proposed measures are sufficient and there is therefore no need to proceed to a Stage 2 Assessment. The general trend of monitoring data suggests that the nitrogen dioxide concentrations have reduced within the AQMA other than what is believed to be a temporary increase in 2019 due to specific short-term traffic conditions. Action plan measures and local developments such as the bus station remodelling are expected to offer up longer-term improvements in air quality within the AQMA.

Table 2 – NLEF Stage 1 Screening Appraisal

No.	NLEF Stage 1 Screening Appraisal Question	Appraisal Response
1	What is the name of the declared AQMA(s)?	Inverness City Centre
2	What pollutants are the AQMA(s) declared for?	Nitrogen dioxide
3	What are the main sources of air pollution, or other factors, contributing to the declaration of the AQMA? (If the main source is not transport-related no further screening is required).	Road Traffic
4	Are the declared AQMA(s) (and therefore area(s) of exceedance) restricted in nature geographically to a small area for which a Low Emission Zone (LEZ) would not be appropriate or proportionate (e.g. single streets, road junctions, small town centre)?	Yes
5	Do the monitored concentrations within the AQMA(s) meet the air quality objective(s)? If yes, for how long has compliance been achieved? If not, what are the extent of the exceedances?	Generally yes, at locations with relevant exposure. Exceedances recorded in 2019 relate to monitoring undertaken at kerbside or street level where relevant exposure is at first floor level.
6	What is the current trend for pollutant concentrations within the AQMA(s) (state the trend for each pollutant declared)?	Automatic monitoring within the AQMA only began in 2016, after the declaration of the AQMA. Some electric buses had already begun operating within the AQMA at that point. 2017 and 2018 annual mean NO ₂ concentration was 38µg/m ³ . 2019 concentration has increased to

No.	NLEF Stage 1 Screening Appraisal Question	Appraisal Response
6 (cont)		43µg/m ³ but it is believed that this is due to temporary traffic conditions caused by temporary road restrictions nearby. Diffusion tube site IV3A, which is the only long-term monitoring site in the AQMA has shown a steadily decreasing trend from the high of 48µg/m ³ in 2012, before AQMA declaration. This site also, however, saw a significant increase in 2019 above what was recorded in the previous two years.
7	Are there any major planned developments which could impact air quality within or surrounding the AQMA(s)?	No known planned developments likely to impact on air quality
8	What are the current trends for vehicle movements within the AQMA and surrounding areas?	Traffic flow has varied significantly over the past few years due to temporary changes in traffic management. Closure of lanes to accommodate repairs to buildings involved re-routing of bus journeys. Most recently the Space for People initiative resulting from the response to the COVID19 pandemic has narrowed some traffic routes.
9	Provide evidence showing how the AQAP (and associated plans, programmes and strategies) will deliver significant improvements towards achieving the air quality objective(s) in as short a timescale as possible?	Many of the Action Plan points have overtaken the Action Plan in practice and have already been implemented. In addition, future developments include proposals to completely revise bus movements around the bus station. The proposals are to create a new exit route via Rose Street which will dramatically reduce the number of journeys via Academy Street and the AQMA