

Low Emission Zone Annual Report (LEZAR)

Year 1: June 2024 to March 2025

The City of Edinburgh Council

in compliance with the legislative requirements of Low Emission Zone (LEZ) annual reporting, under Section 29(1)(a) and Section 29(2) of the Transport (Scotland) Act 2019

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Introduction

- 1.1. To meet statutory air quality objectives, reduce harmful emissions and improve public health, the Council agreed to introduce a [Low Emission Zone \(LEZ\) in Edinburgh city centre](#) for moving vehicles.
- 1.2. The LEZ was approved by Scottish Ministers and subsequently introduced locally in 2022. Enforcement of Edinburgh's LEZ began on 1 June 2024, after a two-year grace period for all vehicles. Aspects that may be determined by local authorities and unique to Edinburgh are summarised below:

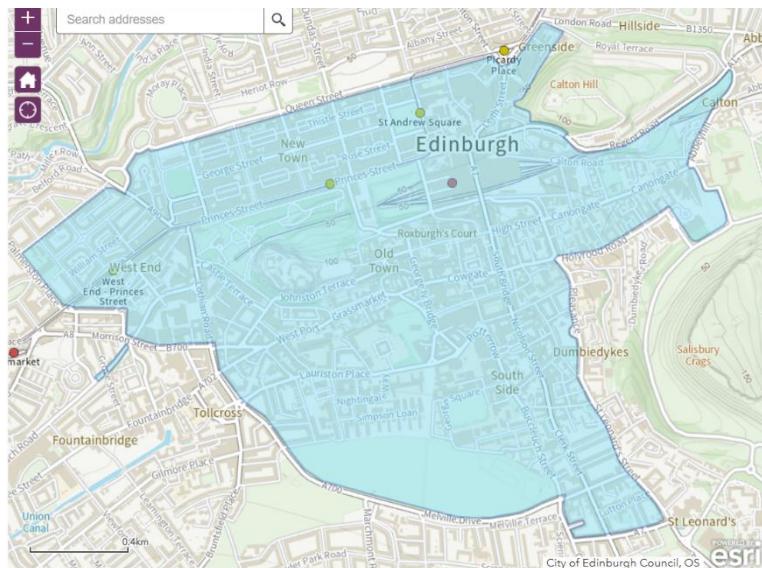
Objectives

- 1.3. LEZ objectives (* denotes statutory objectives) are as follows:
 - 1.3.1. *Contribute towards meeting the air quality objectives prescribed under Section 87(1) of the Environment Act (1995);
 - 1.3.2. *Contribute towards reduction of emissions in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009;
 - 1.3.3. Minimise the impact from traffic displacement across the city's transport network, related to LEZ scheme;
 - 1.3.4. Strategically align with Council sustainable transport, active travel and placemaking objectives; and
 - 1.3.5. Strategically align with national funding provision policies, supporting individual and business adaptation.
- 1.4. Any surplus income from the operation of the LEZ is ring-fenced for projects that support the objectives of the LEZ

Boundary

1.5. The LEZ is located in Edinburgh city centre and is 3.1km² in area. A map of the LEZ is provided in figure 1, below

Figure 1. A map showing the LEZ boundary area in Edinburgh city centre



Operations

- 1.6. The scheme started operation on the 1 June 2022 with a grace period for all vehicle classes, of 24 months prior to enforcement starting on the 1 June 2024.
- 1.7. All vehicles are in scope, with the exception of motorcycles and mopeds.
- 1.8. There has been no stakeholder consultation in the past 12 months, and no responses obtained.
- 1.9. The Council made no changes or amendments to the LEZ scheme design and maintained enforcement 24/7 and did not suspend the LEZ, in full, or in part, at any time.

Local Exemptions

- 1.10. The Council approved a no local exemptions policy but would consider applications received on case-by-case basis to determine the impacts of local exemption identified in relation to the LEZ statutory objectives. According to legislation the Council may grant local temporary ('time-limited') exemptions for a vehicle or type of vehicle for up to 12 months.
- 1.11. To date the Council has issued fewer than 20, 12-month time limited exemptions to specialised vehicles. Examples of these exemptions include specialised tram and railway maintenance vehicles along with a specialist art moving vehicle used by the National Galleries of Scotland.

1.12. Additionally, fewer than 50 one day event exemptions have been granted to vehicles associated with events within the LEZ, although these were all granted within the first six months of enforcement.

Operations

Summary

- 2.1. Since enforcement started on the 1 June 2024, the scheme has operated broadly as expected with some initial challenges.
- 2.2. From June 2024 to March 2025 the Council The key enforcement and compliance activities for the year ending 31 March 2025 show:
 - 2.2.1. 40,945 PCNs were issued, of which 70% were paid across all stages (from discount to debt recovery)
 - 2.2.2. £1,050,780 income was received from Penalty Charge Notices (PCN)
 - 2.2.3. 84.5% of PCNs issued were for first contraventions.
 - 2.2.4. 62.4% of PCNs were paid at the discounted rate.
- 2.3. The Council has begun debt recovery through the Sheriff Officers process and has begun to receive returns.
- 2.4. The Council is finalising the certification of an innovative enforcement solution in the form of a Mobile Enforcement Vehicle (MEV). Since this will be the first of its type in the UK, it has been subject to greater scrutiny than anticipated for cameras and software systems to obtain the relevant certification. At the time of writing, the MEV has received VCA Certification and the Council is finalising the necessary approvals with Transport Scotland. All the operational procedures, people and systems are in place ensuring the MEV can begin enforcement as soon as final approval is granted.

Issues

- 2.5. Overall, the enforcement system operated as expected and specified. As with all new systems, once operational, opportunities for improvements or enhanced customisation can be identified and the Council is working with the provider to introduce several enhancements, specifically around the management of the PCN 'step change' management process and improved operational reporting to enhance efficiency.

Enforcement

- 2.6. The number of vehicles detected entering the LEZ monthly fluctuated by around 30% because of seasonal visitor number variations, with October 2024 being the lowest month (623,372 vehicles) and March 2025 being the highest (785,058 vehicles).
- 2.7. On average this broken down to:
 - 2.7.1. 94% compliant vehicles;
 - 2.7.2. 4% exempted vehicles;

- 2.7.3. 0.8% non-compliant vehicles; and
- 2.7.4. 1.2% covering vehicles that in situations where the vehicle cannot be identified (DVLA inaccuracies, foreign vehicles, misreads etc.).
- 2.8. Since the beginning of enforcement, the number of compliant vehicles detected entering the LEZ rose from around 90% at the start to now being consistently over 95% on a monthly basis. Conversely, the number of exempted vehicles dropped from 8% at the start to now being an average of 3% monthly.
- 2.9. The number of PCNs issued per month is provided in Table 1 below by contravention level.

Table 1. Number of PCNs issued by month and by contravention level (or 'step')

	PCN 1	PCN 2	PCN 3	PCN 4	PCN 5+	Total:
Jun-24	5,765	274	-	-	-	6,039
Jul-24	4,690	638	204	67	23	5,622
Aug-24	4,692	597	193	98	99	5,679
Sep-24	3,334	372	158	69	148	4,081
Oct-24	2,741	286	139	70	131	3,367
Nov-24	3,033	271	98	69	150	3,621
Dec-24	3,692	248	103	49	141	4,233
Jan-25	2,042	192	87	38	137	2,496
Feb-25	2,449	250	68	34	155	2,956
Mar-25	2,318	246	79	52	156	2,851
Total	34,756	3,374	1,129	546	1,140	40,945

- 2.10. An average of 66.5% of the non-compliant, not exempted vehicles detected were issued with a PCN. The remaining 33.5% could not be issued for several reasons including, but not limited to:
 - 2.10.1. No record of the vehicle or keeper at DVLA;
 - 2.10.2. DVLA records being incorrect;
 - 2.10.3. Vehicle identified post capture as having blue badge or other form of exemption;
- 2.11. It is noted that the income lost from incorrect keeper details (name and or address) as a result of inaccurate DVLA records equated to a potential loss of more than £800,000 based on the average payment compliance levels for each stage of enforcement.
- 2.12. The available reporting on cases issued by vehicle category is based on vehicle detections and cases raised within Imperial. This differs from the number of PCNs issued but is a useful general indicator of the number of the volumes of each vehicle category entering the LEZ as shown in Table 2 below.

Table 2. Cases issued by vehicle category and contravention level (or 'step')

Vehicle Category	Step 1 cases	Step 2 cases	Step 3 cases	Step 4 cases	Step 5 cases	All Step cases	% of total
Bus and Coach	172	38	14	9	7	240	0.4%
Heavy goods vehicle	375	62	23	10	15	485	1%
Light goods vehicle (van)	8,622	1,131	426	187	487	10,853	21%
Light passenger vehicle (car)	35,028	2,802	915	433	1,030	40,208	77%
Minibus	223	24	8	2	2	259	0.4%
Motorcycle & Mopeds	12	0	0	0	0	12	0.09%
Special Purpose Vehicle (SPV)	1	0	0	0	0	1	0.01%
TOTALS:	44,433	4,057	1,386	641	1,541	52,058	

This report was run on the 17 June 2025, covering the period from 1 June 2024

2.13. The Council received 3,074 challenges to PCNs with 2,773 PCNs cancelled for a variety of reasons with the top 2 being:

- 2.13.1. Disabled Persons' Blue Badge holder (28%) – where the holder had not registered the vehicle for a one day or long-term exemption.
- 2.13.2. Compliant vehicle (23%) – where the DVLA data was not up to date or entirely accurate.

2.14. The remainder of cancellations cover a wide range of reasons from being diverted into the LEZ as a result of roadworks to compassionate reasons.

2.15. The number of appeals to first tier tribunal is shown in Table 3 below.

Table 3. Appeals to the first tier tribunal by status and number

Status	Number
Appeal lodged but not heard	20
Adjudication appeal allowed	20
Case not contested by Council	47
Appeal rejected. PCN paid in full	9
Appeal rejected. PCN paid at discount	5
Total	101

2.16. The number of 'not contested' cases was higher at the beginning of enforcement where some advanced signage issues were still being resolved or other

mitigating circumstances that led to a not contested decision. Since the advanced warning and directional signage has been put in place, the number of not contested cases has dropped to almost nil. The Council's evidence packs have ensured that the Council's adjudication responses are as robust as possible.

- 2.17. At the time of writing, there were 12,933 live cases in the debt recovery system of which 3,231 were within the time limit for payment prior to external debt recovery. The remaining 9,702 were in the debt recovery process with Sheriff Officers. The first cases were sent to the Sheriff Officers at the beginning of May 2025. It is noted that recovery has commenced, and the Council has started to receive income from debt recovery.

Finance

Costs

- 3.1. The costs of proposing, implementing and operating the LEZ are provided in tables 4 to 6 below, is a copy of the statement of account within this report as per Section 29 as per Transport (Scotland) Act 2019.
- 3.2. From the 2018/19 financial year until the end of 2024/25 financial year: the cost of proposing, implementing and operating the LEZ was £2,946,436; and
- 3.2.1. The majority of this cost was supported by Scottish Government grants, which were offered to all local authorities in Scotland progressing LEZs.

Table 4 LEZ Revenue development spend, by financial year

Year	Grant Funded Expenditure	Non-grant Funded Expenditure	Total Expenditure
2018/19	-	-	-
2019/20	281,677	12,007	293,684
2020/21	53,688	48,427	102,115
2021/22	104,620	36,428	141,048
2022/23	50,000	(2,635)	47,365
2023/24	201,248	12,822	214,070
2024/25	141,301	2,648	143,949
Total	832,534	109,697	942,231

Table 5. LEZ capital spend by financial year

Year	Capital Expenditure
2021/22	43,649
2022/23	154,127
2023/24	897,054
2024/25	909,375
2025/26 (Estimate)	330,000
Total	2,334,205
Total minus Estimate	2,004,205

Table 6. Summary of total LEZ expenditure from financial years 2018/19 to 2024/2

Year	Grant Funded Revenue Expenditure	Non-grant funded Revenue Expenditure	Capital Expenditure	Total Expenditure
2018/19	-	-	-	-
2019/20	281,677	12,007	-	293,684
2020/21	53,688	48,427	-	102,114
2021/22	104,620	36,428	43,649	184,697
2022/23	50,000	(2,635)	154,127	201,492
2023/24	201,248	12,822	897,054	1,111,124
2024/25	141,301	2,648	909,375	1,053,324
TOTAL	832,534	109,697	2,004,205	2,946,436

Revenue

3.3. Revenue is provided as per Section 29 as per Transport (Scotland) Act 2019.

3.4. The gross and net revenue gathered by the authority from the operation of the LEZ is presented in table 7:

- 3.4.1. gross income from PCNs for the year ending 31 March 2025 was £1,050,780.
- 3.4.2. net surplus after costs was £793,187.

Table 7. Net revenue from LEZ in financial year 2024/25

Category	£	£
Revenue from fines and penalties		(1,050,780)
Total revenue costs	552,789	
Less: grant funded costs	(295,196)	
Net revenue costs		(793,187)

Surplus income

3.5. Legislation allows for local authorities to use any surplus income from an LEZ, if generated, to facilitate the achievement of the scheme's mandatory and discretionary objectives. In August 2024, the Council's Transport and Environment Committee approved that where surplus income was not used to fund interventions which have city-wide benefits, priority should be given towards projects on the boundary areas just outwith the LEZ.

3.6. Net allocatable revenue of £793,187 was generated by the scheme in 2024/25.

- 3.7. The surplus income is in the process of being allocated to support various projects and initiatives in accordance the scheme's objectives and the Council's Transport and Environment Committee's additional requirement.
- 3.8. Projects being fully supported by the surplus income include:
 - 3.8.1. Clean Air Day and Clean Air Night 25/26 activities including school engagement on air pollution and climate change and associated actions, with a focus on the two LEZ boundary schools (Preston Street Primary and Tollcross Primary), and a campaign to tackle engine idling
 - 3.8.2. Repeat market research to understand if behaviour/perceptions have changed since LEZ enforcement and use to tailor communications to further support air quality improvement and carbon emission reduction
 - 3.8.3. Research, intelligence gathering and monitoring to provide information to businesses, in respect to air quality issues from licenced premises and wood burning stoves sector
 - 3.8.4. ECOStars Edinburgh Freight Recognition Scheme
 - 3.8.5. Promotion of the Scottish Air Quality Know and Respond service
- 3.9. Projects where surplus income is making a valuable contribution towards their delivery include:
 - 3.9.1. City centre operational planning and renewing the city's strategic transport model to support delivery of the Council's approved [Future Streets - a Circulation Plan for Edinburgh](#). Key objectives include: supporting people to make alternative travel choices that are easier, greener and improve wellbeing, providing suitable and safe space for all users on the city's streets, providing a long-term approach for planning transport and place improvements across the city and delivering a more welcoming, safe, healthier, better-connected and sustainable city centre;
 - 3.9.2. Supporting the delivery of the city's 777 bus lane trial
 - 3.9.3. Progressing the business case to support the expansion of the tram between the north and south of the city and beyond, as a clean form of mass rapid transit
 - 3.9.4. Delivering traffic sensors including within and around the LEZ boundary to improve network data intelligence/monitoring
 - 3.9.5. Employing a full-time data analyst to enhance network data intelligence/monitoring including operation of the city's Urban Traffic Management and Control (UTMC) system which includes digital systems to monitor traffic and environmental conditions to manage traffic flow and air quality in real-time
- 3.10. A proportion of the surplus fund will be retained in reserve as follows:

- 3.10.1. If required, to help mitigate any traffic displacement around the LEZ boundary related to LEZ operation
- 3.10.2. To support future year(s) operational costs associated with enforcing the LEZ to reduce future pressure on Council budgets.

Effectiveness

Air quality impacts

- 4.1. The Local Air Quality Management (LAQM) framework which is set out in the Environment Act (1995) obliges local authorities to review and assess air quality in their areas against statutory pollution objectives.
- 4.2. For the Council's statutory air quality reporting, the Council produces an Air Quality Annual Progress Report (APR) on actions seeking to improve air quality over the previous year. That report also includes detail on air quality monitoring data, trends in local pollutants and emerging issues.
- 4.3. The most recent report, the APR, noted that in general, across the city, there continues to be a decreasing trend of annual mean NO₂ concentrations, with concentrations lower than pre-COVID-19 pandemic levels. This trend is consistent with the national trend of NO₂ pollution showing long-term improvement at urban background and roadside locations and is likely to be the result of lower traffic flows since the pandemic as well as cleaner vehicles in the fleet.
- 4.4. Citywide trends on annual mean NO₂ concentrations are available in the 2024 APR and will be published in the 2025 APR, following review by DEFRA, which will then be presented to Committee in January 2026.
- 4.5. The Scottish Environment Protection Agency (SEPA) are currently updating the LEZ model with updated traffic and air quality information to help evaluate the impact of the LEZ, since enforcement began. This analysis will help assess the LEZ against its statutory objectives; meeting the air quality objectives prescribed under Section 87(1) of the Environment Act (1995) and contributing towards reduction of emissions in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009. SEPA are currently conducting similar analyses for all local authorities with LEZs in Scotland, and results are expected to be available in early 2026. It is anticipated that SEPA will not repeat this modelling exercise in future years for the current LEZ.
- 4.6. Transport Scotland recognise that the first year of the LEZ Annual Report (LEZAR) would likely not align with a full year of LEZ enforcement (starting mid-year) and air quality data (by calendar year), given SEPA timescales. For that reason, in the first year of operation the LEZAR simply refers to the separately published APR.
- 4.7. The SEPA report being drafted, including traffic and air quality impacts relating to the LEZ in 2024/25 will be shared publicly, and with members, when available.
- 4.8. From year 2 of LEZ reporting onwards, Transport Scotland expect local authority LEZARs to include an evaluation of the LEZ's effectiveness on air quality, as outlined in the template provided to them.

Traffic and mode shift impacts

- 4.9. Traffic surveys were undertaken in Edinburgh in May 2025 to validate the LEZ model, post-enforcement. Furthermore, permanent traffic sensors were installed at or near the LEZ boundary. It is anticipated that data may also provide future insight and trend analysis into traffic impacts, in future reporting.
- 4.10. A [study undertaken by the Institute of Occupational Medicine](#) in April 2025, investigated active travel (including walking/footfall) and public transport use following enforcement of the Edinburgh LEZ based on self-reported travel behaviours. Results found a small, but statistically significant, shift towards active travel and public transport within the LEZ, with a decrease in private vehicle use.
- 4.11. LEZ footfall analyses have been made locally with available data by officers. During the study period 2021 – May 2025 various significant transport projects have been delivered by the Council in or near the project area beyond LEZ, including Trams to Newhaven extension and City Centre West East Link cycling and walking project. Analyses of available observed footfall data indicates that walking is a significant mode of travel across the city centre. Over the study period walking mode share and pedestrian volumes have increased. Causality cannot be solely attributed to a single project (including LEZ) but likely to be attributable to the cumulative impacts of the Council's recent projects relating to street-space re-allocation and associated changes to modal priorities on those streets.
- 4.12. Further research with objective, quantitative data will be required to confirm these findings and assess LEZ impacts over a longer time-period.

Impact assessments

- 4.13. No additional impact assessments have been required since the LEZ was enforced in June 2024.
- 4.14. There are no amendments to the scheme being considered at this time.