

Low Emission Zone Annual Report (LEZAR)

Year 2: April 2025 to March 2026

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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1. 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 in Edinburgh's city centre and is 3.1km² in area. A map of the LEZ is provided in Figure 1, below.

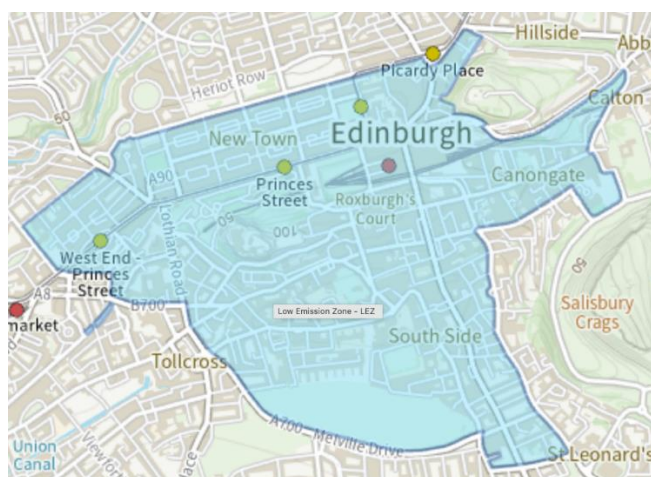


Fig 1.0 – map of [Low Emission Zone \(LEZ\) boundary](#) – The City of Edinburgh Council

Background

- 1.6. The scheme started 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 during the year.

Local Exemptions

- 1.10. The Council approved a no local exemptions policy but will consider applications received on a case-by-case basis to determine the benefits and impacts of such requests 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. No one day exemptions were granted in 2025/26

2. Operations

- 2.1 The LEZ has operated as expected throughout the year, with the number of PCNs issued falling when compared to Year 1 of operation. Analysis shows that this is due to three main factors:
- 2.1.1 The volume of vehicles being driven into the LEZ is reducing annually.
 - 2.1.2 The composition of vehicles in the UK is shifting from non-compliant to compliant vehicles.
 - 2.1.3 There is anecdotal and [empirical evidence](#) to suggest that people are choosing alternative and more sustainable methods of transport to and from the city centre..
- 2.2 In March 2026, the Vehicle Certification Agency (VCA) certified the use of the Mobile Enforcement Vehicle (MEV) for LEZ operations and enforcement started shortly thereafter. The MEV provides additional enforcement within the LEZ and at various LEZ entry points. In addition, it provides a back-up enforcement capability should there be planned maintenance or intermittent issues with existing fixed camera devices. In the first few weeks of operations, 16 PCNs were issued by the MEV and, at the time of writing, officers are still optimising the MEV operations to ensure that the vehicle is both a highly visible deterrent and operates efficiently.

Operational Issues

- 2.3 There were no LEZ suspensions during the year
- 2.4 In general, the scheme operated as planned and expected. A few issues affected camera availability which resulted in a few cameras experiencing some downtime . In the main these were related to software issues, cellular network coverage or water ingress. Of these, only one was significant, with downtime of just over one month due to road works in the vicinity and several interruptions to the camera power supply over this period. All the issues however, have been resolved satisfactorily with upgrades or replacements.

LEZ Scheme Enforcement 2025/26

- 2.5 37,092 LEZ PCNs were issued
- 2.6 During the year we note the following general trends in enforcement:
- 2.6.1 73.7% of PCNs issued were paid.
 - 2.6.2 Payment compliance drops significantly as the value if the PCNs issued increases.
 - 2.6.3 7.1% of PCNs could not be issued as a result of missing or inaccurate keeper records held by the DVLA.

DVLA Keeper Records

- 2.7 There are issues with missing and inaccurate keeper details within the DVLA databases. Inaccuracies can sometimes be the result of people moving home, but taking longer to update their records with the DVLA, or updating their driver license details, but not realising they must also do the same for their vehicle. These are two separate processes managed by the DVLA.
- 2.8 However, data also suggests some drivers are not maintaining their statutory responsibilities to ensure that their vehicle keeper details remain up to date with the DVLA. As a result, 7.1% of PCNs issued were unenforceable because the keeper details were either missing or incorrect.

Cases by Vehicle Category

- 2.9 The table below shows the number of cases issued by vehicle type and PCN level during the year.

Table 1: Cases issued by vehicle category and contravention level (or 'step')

Vehicle Category	Penalty Charge Contraventions						
	Level 1	Level 2	Level 3	Level 4	Level 5+	All	% of Total
Bus and Coach	123	28	17	12	49	229	0.6%
HGV	263	43	14	7	6	333	0.8%
LGV	6,514	792	302	141	564	8,313	21.1%
Light Passenger Vehicle	26,530	1,875	649	314	1,059	30,427	77.1%
Minibus	152	20	7	2	1	182	0.46%
Special Purpose Vehicle	2	0	0	0	0	2	0.1%
Totals	33584	2758	989	476	1679	39486	100%

Note: This is different from the total number of PCNs issued as reports cannot distinguish between the number of cases created and the number of PCNs issued.

Appeals at 1st Tier Tribunal

- 2.10 During the year, the number of appeals heard by the first-tier tribunal service was 61, of which:
- 2.10.1 Dismissed (won by the Council): 21
 - 2.10.2 Non-contested by the Council: 19
 - 2.10.3 Withdrawn by Appellant or Tribunal: 12
 - 2.10.4 Allowed (won by Appellant): 8
 - 2.10.5 Awaiting decision: 1

Pursuing Unpaid PCNs

- 2.11 Around 19% of LEZ PCNs issued, where a keeper can be traced, are unpaid and require the Council to use its powers to recover the unpaid debt through the sheriff officers' process. This is compared to 15% for bus lane and 11% for parking penalty charges, respectively.

- 2.12 Unfortunately, the majority of these cases currently remain open with sheriff officers, but efforts continue to pursue motorists for outstanding payments. This process was successful in recovering an additional £230,000 of LEZ income during the year.
- 2.13 The escalating nature of the LEZ PCNs values means that the top 50 debtors currently owe the Council a total of almost £530,000 from a total of 864 PCNs. The largest individual debtor owes in excess of £20,000 in LEZ PCNs.
- 2.14 It is also noted that of those vehicles issued with multiple LEZ PCNs, there is a high percentage that are on the road illegally:
- 2.14.1 Without a valid MOT
 - 2.14.2 Without Road Tax
 - 2.14.3 Without accurate keeper details or with deliberately falsified details
 - 2.14.4 Should be off the road as have a SORN declaration.
- 2.15 Whilst these matters are outwith the Council's control or current enforcement powers, this shines a light on the condition of vehicles driving on the city's streets. Thus, we are exploring sharing this data with the Police so that they may pursue these issues further.

PCNs Issued

- 2.16 Table 2 below shows the PCNs issued at each level on a monthly basis through the year.

Table 2: LEZ PCNs issued each Month

Month	Level 1	Level 2	Level 3	Level 4	Level 5+	Total
1	2,860	210	92	34	142	3,338
2	2,846	264	102	42	147	3,401
3	2,627	252	86	58	134	3,157
4	2,752	250	88	51	152	3,293
5	3,643	271	88	36	155	4,193
6	2,390	229	75	36	123	2,853
7	2,491	235	89	41	139	2,995
8	2,659	222	83	39	151	3,154
9	3,105	225	85	33	137	3,585
10	1,918	169	63	40	119	2,309
11	1,974	197	45	28	124	2,368
12	1,983	207	78	30	148	2,446
Total	31,248	2,731	974	468	1,671	37,092

3. Finance

- 3.1 The costs of proposing, implementing and operating the LEZ are provided in tables 4 to 6 below. This details the statement of account within this report as specified by Section 29 of the Transport (Scotland) Act 2019.
- 3.2 From the 2018/19 financial year until the end of 2025/26 financial year: the cost of proposing, implementing and operating the LEZ was £3,335,082.
- 3.3 The majority of the implementation costs were supported by Scottish Government grants, which were offered to all local authorities in Scotland progressing LEZs.

Table 3: 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 4: LEZ capital spend by financial year

Year	Capital expenditure
2018/19	-
2019/20	-
2020/21	-
2021/22	£43,649
2022/23	£154,127
2023/24	£897,054
2024/25	£909,375
2025/26	£388,646
Total	£2,392,851

Table 5: Summary of total LEZ expenditure from financial years 2018/19 to 2025/26

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
2025/26	-	-	£388,646	£388,646
Total	£832,534	£109,697	£2,392,851	£3,335,081

Revenue

- 3.4 Revenue is provided as per Section 29 of the Transport (Scotland) Act 2019.
- 3.5 The gross and net revenue gathered by the authority from the operation of the LEZ is presented in table 7:
- 3.5.1 LEZ PCN revenue received was £1,225,658
- 3.5.2 A net surplus after costs of £441,578.

Table 6: Net revenue from LEZ in financial year 2024/25

Category	£
Revenue from PCNs	1,225,658
Less revenue costs	784,080
Less grant funded costs	-
Net revenue costs	441,578

Surplus Income

- 3.6 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 out with the LEZ.
- 3.7 Net allocatable revenue of £793,187 was generated by the scheme in 2024/25 and allocated to various workstreams as reported in the [LEZ Annual Report 2024/25](#).
- 3.8 Net allocatable revenue of £441,578 was generated by the scheme in 2025/26.
- 3.9 This surplus income has been allocated to support various projects and initiatives in accordance with the scheme's objectives as laid out in Table 8.

Table 7: Use of LEZ Surplus Income

Project / Resource	Estimated cost	Full cost or contribution	Details
Visitor Levy Funded Schemes - Design Work	£100,000	Contribution	Provide funding toward design and development stages of projects with Visitor Levy funding for delivery.
Street Trees - Rolling contribution available to projects within the LEZ	£100,000	Contribution	Projects would support air quality and reduce carbon emissions. Key opportunity to also reduce heat island effects through the city as our climate warms. Approach supports the Council's Climate Ready Edinburgh Plan.
Data Analyst post within CEC Data Team	£90,000	Full cost (1 year only)	One-year fixed term post embedded within the Council's Data Team to support development of in-house traffic volume data storage and analysis capabilities.
Turnhouse Road Bus Gate	£43,000	Full cost	Implement on a trial basis, includes monitoring, evaluation and reporting.
Bus Congestion Analysis	£23,875	Full cost	To analyse congestion data and report results to the Transport and Environment Committee.
PT Rolling Programme	£44,000	Contribution	A contribution to Public Transport's rolling improvement programme.

- 3.10 Similar to last year, a portion of the surplus income will be set aside to support future year(s) operational costs associated with enforcing the LEZ to reduce future pressure on Council budgets.

4. Evaluation

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 [Air Quality Annual Progress Report](#) 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 from 2025 data and will be published in the 2026 APR and presented to the Council's Transport and Environment Committee in November 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 presented to the Council's Transport and Environment Committee in November 2026.

Traffic and mode shift impacts

- 4.6 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.
- 4.7 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.

- 4.8 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.
- 4.9 Further research with objective, quantitative data will be required to confirm these findings and assess LEZ impacts over a longer time-period.

Impact Assessments

- 4.10 No additional impact assessments have been required since the LEZ was enforced in June 2024.

Future Scheme Amendments

- 4.11 No amendments are planned within the next 12 months.