

2024/2025 ANNUAL LOW EMISSION ZONE REPORT



DUNDEE CITY COUNCIL

LOW EMISSION ZONE

ANNUAL REPORT 2025

2025 Dundee Low Emission Zone Annual Report for Dundee City Council

In fulfilment of Section 29 of Part 2 of the Transport (Scotland) Act 2019

April 2025

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1 Introduction

- 1.1 Under the powers granted by Part 2 of the [Transport \(Scotland\) Act 2019](#) (the 'Act'), and in accordance with [The Low Emission Zones \(Scotland\) Regulations 2021](#) and [The Low Emission Zones \(Emission Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#), Dundee City Council (DCC) introduced a Low Emission Zone (LEZ) in Dundee. The Dundee LEZ became fully operational with enforcement beginning on 30 May 2024.
- 1.2 Section 29 of the [Transport \(Scotland\) Act 2019](#) states: A local authority which is operating a low emission zone scheme during a financial year must, as soon as reasonably practicable after the end of the financial year:
- prepare an annual report on the operation and effectiveness of the scheme;
 - publish the report in such manner as it considers appropriate;
 - send a copy of the report to the Scottish Ministers; and
 - lay a copy of the report before the Scottish Parliament.

2 Required Content of LEZ Annual Report

- 2.1 Guidance on the content of an LEZ Annual Report is provided within the Transport Scotland document, [Low Emission Zone Guidance](#). The LEZ annual report must include summary detail of the LEZ as previously set out in the LEZ Scheme Design approved by Scottish Ministers, including:
- the scheme size, boundary location, vehicle scope, the date of scheme introduction and grace period start/end dates;
 - any modifications to the scheme in the past 12 months (noting that Section 9(1) (b) of the Act provides a local authority with powers to amend an LEZ following a consultation); and
 - consultation(s) undertaken and responses obtained from stakeholders as listed in Section 11 of the Act and in the Low Emission Zones (Scotland) Regulations 2021.
- 2.2 The annual report must also include a summary of the operation and effectiveness of the scheme including an assessment of:
- the number of penalties issued, with details to include vehicle type, repeat offenders and associated surcharge application;
 - the number of appeals received and a summary statement on their outcomes (success or decline);
 - the costs of proposing, making and operating the scheme;
 - The gross and net revenue gathered by the authority from the operation of the scheme; and
 - details of how the revenue has been used to facilitate the achievement of the scheme's mandatory and discretionary objectives.

- 2.3 The performance of the LEZ in respect to air pollutant concentrations, such as nitrogen dioxide (NO₂) and Particulate Matter (PM₁₀ and PM_{2.5}) does not fall within the scope of this report. Air quality monitoring data is provided within the annual progress report on air quality that local authorities are required to produce and submit to the Scottish Government in accordance with the Local Air Quality Management (LAQM) process.
- 2.4 The 2025 Annual Progress Report on air quality will provide commentary on the impact so far of the LEZ on pollutant concentrations in relation to the air quality objectives, taking cognisance though that the objectives relate to calendar year annual mean levels. As enforcement of the Dundee LEZ scheme began on 30 May 2024, only 7-months of the monitoring year will have the full influence of the LEZ. A further post-LEZ implementation analysis is proposed to be undertaken by the Scottish Environment Protection Agency (SEPA) later in 2025, replicating the analysis undertaken prior to the LEZ being introduced.

3 The Dundee Low Emission Zone

- 3.1 Full details of the Dundee LEZ can be found within the [LEZ Scheme Design](#) with all key information summarised on the [LEZ](#) website.
- 3.2 The objectives of the Dundee Low Emission Zone were accepted at the Community Safety & Public Protection Committee meeting on 24 February 2020 and are as follows:
- protect public health through improving air quality in Dundee and achieving air quality compliance for nitrogen dioxide (NO₂), Particulate Matter (PM)₁₀ and PM_{2.5} (prescribed under section 87(1) of the Environment Act 1995);
 - develop an environment that helps promote more active and sustainable travel choices in Dundee and contributes to meeting emission reduction targets set out in Part 1 of the Climate Change (Scotland) Act 2009; and
 - contribute to the ongoing transformational change in Dundee and help promote the city as an inclusive and desirable place to live, invest, visit and learn.

3.3 LEZ Area

Dundee's LEZ is less than one square mile in size and covers the area within the A991 inner-ring road, excluding the Bell Street, West Marketgait NCP and Wellgate multi-storey car parks. A map of the Dundee LEZ is shown in Appendix A (figure 1). The map can also be accessed at Dundee LEZ – [Map](#)

A list of roads within the LEZ is also in Appendix A (figure 2) and is available at [Dundee LEZ](#).

3.4 LEZ Introduction and Grace Periods

The LEZ was introduced on 30 May 2022 following approval of the LEZ Scheme Design by both the Community Safety and Public Protection Committee and by the Scottish Ministers. Following a 2-year grace period enforcement began on 30 May 2024.

The decision to allow a 2-year grace period was driven by feedback obtained through consultation and stakeholder engagement as to how quickly those affected by the introduction of the LEZ were able to become compliant. In addition to this, the

unprecedented impact of the Covid-19 pandemic on society, including the wider environment and economy, needed to be considered.

3.5 Scope of the LEZ

The national LEZ Regulations apply to all vehicle types, with the exception of motorbikes and mopeds, and those vehicle types or uses considered exempt in Regulations.

Table 1 of Appendix B sets out the vehicle types to which the LEZ applies, as specified in Annex II of Directive 2007/46/EC.

Entry to the LEZ by the above vehicle categories is only permitted if they meet or exceed the nationally consistent emissions standards as set out in [The Low Emission Zones \(Emission Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#) and summarised in Table 2 of Appendix B for compression engine (diesel) vehicles and in Table 3 of Appendix B for positive ignition (petrol and gas) vehicles.

Vehicles which have been retrofitted with a suitable emissions abatement system, such that their tailpipe emissions now meet or exceed the relevant emissions standard for their vehicle type as detailed above, are permitted access to the LEZ. Such retrofitted vehicles must be suitably accredited by an independent scheme such as the Clean Vehicle Retrofit Accreditation Scheme (CVRAS).

Vehicles which have undergone repowering, either through the installation of a new engine or other power type, are also permitted access to the LEZ, should the repowering result in emissions which meet or exceed the above emissions standards.

3.6 Operating Hours of the LEZ

The Dundee LEZ operates at all times, 365 days a year and 24 hours a day. The Dundee LEZ was introduced in respect of breaches of the annual mean NO₂ air quality objective and therefore emissions at all times contribute to these breaches.

Dundee City Council may temporarily suspend the operation of the LEZ scheme for a specified period where it is considered appropriate to do so for the purposes of a significant national or local event. A suspension may also be issued in relation to a temporary diversion into the LEZ where vehicles follow a signed diversionary route.

3.7 Exemptions and Time Limited Exemptions

A number of vehicle types are exempted from LEZs within Scotland, as defined in [The Low Emission Zones \(Emission Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#). A full list of these can be found in Table 4 of Appendix B.

The Transport (Scotland) Act 2019 allows local authorities to grant non-compliant vehicles, or vehicle types, a time limited exemption which would permit them to operate within an LEZ. These exemptions are limited to a maximum of one year but may be renewed by the local authority.

The Dundee LEZ scheme allows applications for a time limited exemption under circumstances where entry of a non-compliant vehicle is required for a specific, defined purpose not considered in legislation or regulations. Applications are determined on their individual merits. Examples of this include but are not limited to; abnormal loads or machinery transport, historic vehicles or vehicles of particular speciality not covered

by other exemptions and used for a specific purpose, or any other non-compliant vehicle use deemed appropriate on application to Dundee City Council.

Applications for time-limited exemptions will not normally be considered for the routine transport of people or goods or for routine commercial operations. However, Dundee City Council may apply a time-limited exemption, by reference to the vehicle's use, upon consideration of an application. Exemptions will only be granted in exceptional circumstances and may be subject to conditions or restrictions as deemed appropriate by Dundee City Council. Private vehicles will not be considered for exemption.

- 3.8 Section 9(1)(b) of the Transport (Scotland) Act 2019 provides a local authority with powers to amend an LEZ following a consultation. No amendments to the Dundee LEZ have been made and the LEZ operates in accordance with the original LEZ Scheme Design.
- 3.9 As the Dundee LEZ has not been amended, no additional consultation has been undertaken since the LEZ became operational. Details of pre-inception public consultation and stakeholder engagement can be found in the [LEZ Scheme Design document](#).

4 Dundee LEZ – Operations

4.1 LEZ Penalty Charge Notices

- 4.1.1 Penalty charges for non-compliant vehicle entry into an LEZ in Scotland are set at a national level as seen in [The Low Emission Zones \(Emission Standards, Exemptions and Enforcement\) \(Scotland\) Regulations 2021](#) and in Table 5 of Appendix B.

The initial penalty charge is set at £60 and is reduced by 50% if paid within 14 days. Where repeat entry by the same vehicle is detected within a 90-day period, this penalty charge rate will double, doubling again on each subsequent entry up to a maximum determined by vehicle type. Where no subsequent entry by a non-compliant vehicle is detected within a 90-day period, the penalty charge is reset to the initial penalty charge rate of £60.

- 4.1.2 As the quantity of penalty charge notices (PCNs) issued has been of significant public and media interest, figures have been published monthly on the LEZ webpage since enforcement of the LEZ began. This information, for the financial year 2024/2025, is replicated within this report.
- 4.1.3 Between 30 May 2024 and 31 March 2025 a total of 13,757 PCNs were issued for non-compliant vehicle entry to the Dundee LEZ. The monthly totals of issued PCNs, and the relative level of the PCN, are shown in Table 1 below.

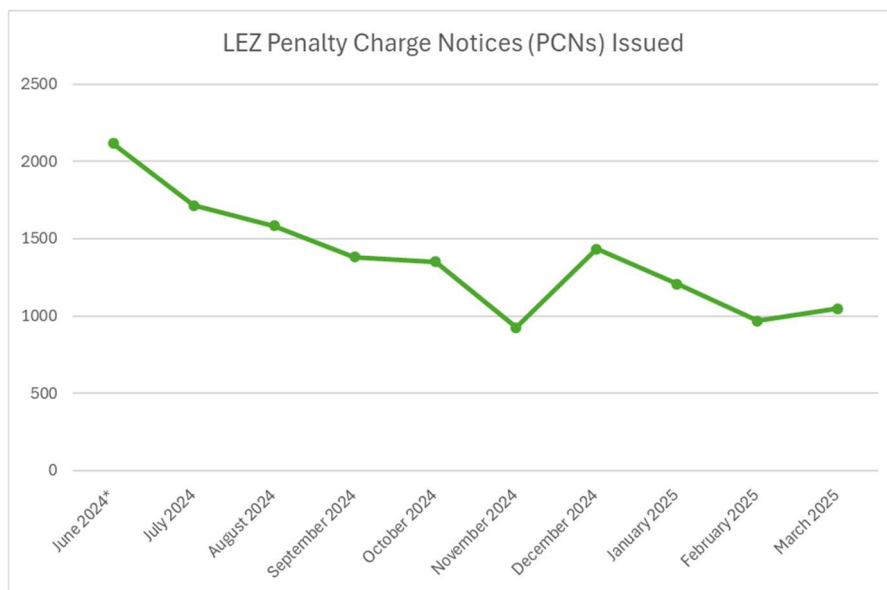
Table 1: LEZ Penalty Charge Notices (PCNs) Issued

	PCN 1	PCN 2	PCN 3	PCN 4	PCN 5+	Total
June 2024*	1,980	132	5	0	0	2,117
July 2024	1,390	213	93	31	17	1,744
August 2024	1,266	164	63	40	51	1,584
September 2024	1,089	117	62	39	75	1,382
October 2024	1,043	134	38	39	96	1,350

November 2024	700	91	37	17	79	924
December 2024	1,075	133	66	36	123	1,433
January 2025	878	127	57	33	113	1,208
February 2025	709	112	39	26	81	967
March 2025	768	107	44	23	106	1,048
Total	10,898	1,330	504	284	741	13,757

*Includes PCNs for contraventions on 30 and 31 May 2024

- 4.1.4 The level of PCNs issued has steadily declined over the year with the daily average of PCNs issued reducing from 59 per day in the first three months of the LEZ's operation to 36 per day in the period from January to March 2025.



4.2 LEZ Penalty Charge Appeals

- 4.2.1 As of 31 March 2025, 2,538 appeals against an LEZ PCN have been received, with 34% (851) of these being successful, resulting in the PCN being cancelled. Most cancellations were due to:

- the recipient of the PCN being a blue badge holder (not necessarily with a registered exemption);
- evidence being provided that the vehicle was LEZ compliant;
- evidence provided that the vehicle has been sold; and
- the vehicle being in an exempt class or the Vehicle Registration Mark (VRM) being recorded incorrectly.

- 4.2.2 The majority of unsuccessful appeals were from recipients of PCNs stating that:

- they were unaware of the LEZ;

- they were lost and had entered the zone inadvertently; and
- they were attending a meeting/had an appointment or were making a delivery.

4.2.3 Unsuccessful appellants are eligible to refer their case to the Scottish Transport Appeals Tribunal who act as an independent adjudicator. Up to 31 March 2025, 19 cases had been submitted, of which 11 were upheld in the applicants' favour.

5 LEZ Exemptions

5.1 14 Time Limited Exemptions of one year were granted to non-compliant vehicles in the first year of LEZ operation. The majority of these were specialised vehicles requiring limited entry to the zone for a specific purpose. [Guidance](#) on Time Limited Exemptions is published on the Council website.

6 Dundee LEZ – Income and Expenditure

6.1 Penalty Charge Income

6.1.1 From 30 May 2024 until 31 March 2025 a total of £300,529 was received in payment of LEZ penalty charge notices. £690.00 was subsequently refunded following appeals or cancellations, resulting in net revenue from PCN payments for the financial year of £299,839.

6.1.2 Table 2

Payment/Refund Level	Number	Total £
–£180 (refund)	1	–£180
–£90 (refund)	1	–£90
–£60 (refund)	2	–£120
–£30 (refund)	10	–£300
£30.00	5,814	£174,420
£60.00	663	£39,780
£90.00	543	£48,870
£120.00	86	£10,320
£180.00	58	£10,440
£240.00	41	£9,840
£360.00	5	£1,800
£480.00	1	£480
£720.00	3	£2,160
Miscellaneous	93	£2,419
TOTAL		£299,839

6.1.3 5,814 of the LEZ PCN payments received were paid at the first level of penalty charge and within the 14-day period eligible for a 50% discount, resulting in a payment of £30. Other payment levels may be linked to different surcharge levels of PCN e.g. a £60 payment may be in relation to a level 1 PCN paid after 14 days or a level 2 PCN paid

within 14 days. A total of 93 payments were received, comprising of variable amounts. These include partial payments collected by Sheriff Officers.

6.2 LEZ Expenditure

- 6.2.1 Development of the Dundee LEZ has been ongoing since 2018/2019, with all the associated costs grant funded by the Scottish Government. These costs provided for LEZ modelling, appraisal, communications, engagement, impact assessments, design works, LEZ signage and enforcement camera infrastructure. Costs incurred since scheme approval include further development costs and operational costs relating to enforcement.
- 6.2.2 The Council had incurred total costs related to the LEZ scheme of £1,515,019 by 31 March 2025. An analysis of total expenditure to date is included in the table below:

Table 3: Analysis of Total LEZ Expenditure 2018/2019 to 2023/2024

Year	Grant Funded Revenue Expenditure £	Grant Funded Capital Expenditure £	Total Expenditure £
2018/2019		35,000	35,000
2019/2020	730	298,343	299,073
2020/2021	120	0	120
2021/2022		151,649	151,649
2022/2023		350,417	350,417
2023/2024		312, 237	312,237
2024/2025	230,000	136,524	366,524
Total	230,850	1,284,169	1,515,019

6.3 **LEZ Operational Expenditure**

- 6.3.1 As LEZs are a new enforcement and penalty charge system within Scotland, there was a significant degree of uncertainty around the expected operational revenue. As such, Scottish Government funding in financial year 2024/2025 included enforcement and back-office staff costs as well as communications and engagement funding. Total revenue grant funding for these activities in 2024/2025 amounted to £230,000.
- 6.3.2 As set out in the legislation, the net revenue of the scheme can only be applied for the purpose of facilitating the achievement of the scheme's mandatory and/or discretionary objectives. In 2024/2025, due to the provision of Scottish Government grant funding for the operational costs of administering the scheme, a net revenue of £286,004 was generated.

7 **Use of LEZ Revenue**

- 7.1 Net allocatable revenue of £286,004 was generated by the scheme in 2024/2025. It is forecast that LEZ income will decline in future years and the revenue received in the first year has been carried forward to 2025/2026 as a provision to support future years' costs of operating and maintaining the LEZ infrastructure. The trend in PCNs issued will continue to be monitored throughout 2025/2026 in order to allow future

consideration to be given to the potential for LEZ income to be used to fund environmental improvements that support the aims of the LEZ scheme.

8 Next Steps

- 8.1 Following approval by the Dundee City Council Climate Environment and Biodiversity Committee the report will be submitted to the Scottish Ministers who will then lay the report before parliament.
- 8.2 An update report will be published on an annual basis, with the next report detailing the LEZ performance for financial year 2025/2026.

APPENDIX A: MAP OF THE LEZ AND SCHEDULE OF ROADS WITHIN THE LEZ

Figure 1: Map of the LEZ



Figure 2: List of Streets in the LEZ

Road Name	Part of Road Which Forms Part of LEZ
Allan Lane	Full length
Albert Square	Full length
Argyllgait	Full length
Bank Street	Full length
Barrack Street	Full length
Bell Street	Between Victoria Road and Constitution Road
Cameron's Close	Full length
Candle Lane	Full length
Castle Street	Full length
Chapel Street	Full length
Commercial Court	Full length
Commercial Street	Full length

Road Name	Part of Road Which Forms Part of LEZ
Constitution Road	Full length
Courthouse Square	Full length
Couttie's Wynd	Full length
Cowgate	Full length
Crichton Street	Full length
Dock Street	Between Whitehall Crescent and Commercial Street/A991 junction
Euclid Crescent	Full length
Euclid Street	Full length
Exchange Court	Full length
Exchange Street	Full length
Forester Street	Full length
Gellatly Street	Full length
High Street	Full length
Irvine's Square	Full length
Johnston Street	Full length
King Street	Between St Andrew's Street and North Marketgait
Malthouse Close	Full length
Mary Ann Lane	Full length
Meadow Entry	Full length
Meadowside	Between Meadow Lane and Constitution Road
Murraygate	Full length
Nethergate	Between West Marketgait and Crichton Street
Nicholl Street	Full length
North Lindsay Street	Full length
Panmure Street	Full length
Peter Street	Full length
Pullar's Close	Full length
Queen Street	Full length
Rattray Street	Full length
Reform Street	Full length
Royal Exchange Lane	Full length
Seagate	Between Commercial Street and East Marketgait

Road Name	Part of Road Which Forms Part of LEZ
Shore Terrace	Full length
Soapwork Lane	Full length
South Ward Road	Full length
St Andrew's Lane	Full length
St Andrew's Street	Full length
Sugarhouse Wynd	Full length
Trades Lane	Full length
Union Street	Full length
Ward Road	Full length
West Bell Street	Full length
Whitehall Crescent	Full length
Whitehall Street	Full length
Willison Street	Full length
Yeaman Shore	Full length

APPENDIX B: VEHICLE SCOPE, EMISSION STANDARDS, EXEMPTIONS AND PENALTY CHARGE LEVELS

Table 1: Vehicle Type Approval Categories for the Dundee 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 five 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 five tonnes.
Light Goods Vehicles (LCVs)	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.

Table 2: Compression Engine (Diesel), LEZ Emission Standards

Vehicle Category	Emissions Standards	Euro Category
Heavy-duty vehicles (eg 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: - an ambulance (which is not exempt under the Regulations); - a hearse; and - a motor caravan.	Euro 6	M1, M2, M3

Table 3: Positive Ignition (Petrol and Gas) Engine, LEZ Emission Standards

Vehicle Category	Emissions Standards	Euro Category
Heavy-duty vehicles (eg 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: - an ambulance (which is not exempt under the Regulations); - a hearse; and - a motor caravan.	Euro 4	M1, M2, M3

Table 4: National Exemptions Applying to the Dundee LEZ

Vehicle Type or Classification	Description
Emergency vehicles	The vehicle is being driven by any person who is: - undertaking their duty as a constable - providing a response to an emergency at the request of the Scottish Ambulance Service Board - exercising the functions of the Scottish Ambulance Service Board, the Scottish Fire and Rescue Service, Her Majesty's Coastguard or the National Crime Agency
Naval, Military, or Air Force Vehicles	Vehicles being used for naval, military or air force purposes.

Vehicle Type or Classification	Description
Historic Vehicles	- the vehicle was manufactured, or registered under the Vehicle Excise and Registration Act 1994, for the first time at least 30 years ago - the vehicle is no longer in production, and - 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.
Vehicles for Disabled Persons*	- 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; - a passenger in the vehicle has been issued with a badge under that section of that Act, or; - A badge for the vehicle has been issued under section 21(4) of that Act; - 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 - 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).
Showman Vehicles	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.

*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.

Table 5: Penalty Charges Applying to the Dundee LEZ

	Initial Penalty Charge	Subsequent Penalty Charges			
Vehicle Category	1	2	3	4	5
Light Passenger Vehicle	£60	£120	£240	£480	£480
Minibus	£60	£120	£240	£480	£960
Bus and Coach	£60	£120	£240	£480	£960
Light Goods Vehicle	£60	£120	£240	£480	£480
Heavy Goods Vehicle	£60	£120	£240	£480	£960
Special Purpose Vehicle (SPV)	£60	£120	£240	£480	£480

APPENDIX C: LEZ STATEMENT OF ACCOUNT

Under the powers granted by Part 2 of the Transport (Scotland) Act 2019, and in accordance with The Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations (hereafter referred to as “the regulations”) 2021, Dundee City Council has introduced a Low Emission Zone. A low emission zone (LEZ) is an area where only certain vehicles are allowed to enter based on their emissions standards. The LEZ was introduced to address air pollution in the city centre, mainly nitrogen dioxide (NO₂), caused by road traffic. The LEZ comprises an area of approximately one square mile of the City Centre.

Enforcement of the zone officially commenced on 30 May 2024 after a two-year grace period, and the regulations now apply to all vehicles entering the zone. When a non-compliant vehicle is detected in the zone, a Penalty Charge Notice (PCN) is issued to the registered keeper of the vehicle.

The regulations specify that any local authorities operating an LEZ scheme must keep accounts for the duration of the scheme’s operation. This account should outline the costs of proposing, making, and operating the scheme.

In 2024/2025, the LEZ generated a net revenue of £286,004 in (2024/2025) The following table sets out the financial performance of the scheme:

Low Emission Zone	2024/2025
Revenue grants	(230,000)
Income from PCNs	(299,839)
Capital grants	(122,689)
Total	(652,528)

Employee costs	125,000
Software Provision	47,743
Royal Mail Tracked 48	57,257
Capital expenditure	136,524
Total expenditure	366,524
Net (revenue)	(286,004)

The infrastructure costs associated with the LEZ were primarily funded by capital grants provided by the Scottish Ministers. The costs of operating the scheme were funded by revenue grants provided by the Scottish Ministers.