

Please direct correspondence to:
Dr Richard Dixon, Director
Friends of the Earth Scotland
Thorn House
5 Rose Street
Edinburgh
EH2 2PR
rdixon@foe.scot

12 February 2019

Dear ,

Parking Levies and the Transport Bill

We, the undersigned, support the reported plans to include an amendment to the Transport Bill, for local authorities to be given the freedom to introduce a Workplace Parking Levy. We have many different aims and objectives, but we all share a common aspiration for a safer, fairer, cleaner and healthier Scotland, where more of us walk, cycle, and use public transport and where fewer of us suffer from the negative impacts of car driving.

Workplace Parking Levies will fulfil a number of objectives which we know are shared across the political spectrum, including:

- Reducing congestion.
- Providing investment for sustainable transport options.
- Bringing Scotland into compliance with its European legal obligations on air quality and protect public health.
- Reducing carbon emissions from the transport sector.
- Making Scotland's transport system work for everyone, whether rural or urban, and to improve our physical, mental and social health as a nation.

Success

Workplace parking levies have a track record of delivering significant changes to travel habits, bringing much needed investment to transport infrastructure, and creating healthier places to live and work. Nottingham's levy is one notable success. A WWF report found that in its first three years, the levy raised £25.3 million of revenue, all of which has funded improvements in the city's transport infrastructure, whilst contributing to a 33% fall in carbon emissions, and a modal shift which has seen public transport use rise to over 40%.¹

The revenue from the levy has allowed Nottingham to deliver Europe's largest fleet of electric buses, create new tram routes, and invest £6.1 million in improved cycle routes.

¹ WWF Scotland, "International Case Studies for Scotland's Climate Plan," <https://www.wwf.org.uk/sites/default/files/2016-12/nottingham%20case%20study%20-%20Workplace%20parking%20levy.pdf>

The demand for the levy

We believe these powers should be devolved because councils have asked for the powers. Local authorities should have the power to shape the transport networks that is right for their area. It is highly likely that the use of WPL powers will be confined to a small number of local authorities, but we believe the decision is best made by those who know the needs, and transport challenges, of the local area.

The Transport Bill is a unique opportunity to give councils the power to implement this levy if they wish to do so. This would be a key step to achieving the shared goals of improving our transport system, our public health, our environment, and urban spaces.

There is a clear demand for step change in Scotland's transport system, and a move away from a dependence on cars. Air pollution, which is primarily from transport, is responsible for the early deaths of 2,500 people in Scotland each year². It causes heart attacks, strokes, and respiratory problems³. A workplace parking levy has the opportunity to deliver the dual-benefits of reducing emissions whilst creating investment in transport.

Private Non-Residential Parking Levies

In addition to introducing provision for WPLs, we urge the Scottish Government to investigate the opportunities to introduce further innovative policy, giving local authorities the power to charge levies on other premises with large-scale parking. In addition to promoting alternate methods of travel, PNR (also known as Premises Parking Levy) would enable local authorities to protect town centres, since these levies would help encourage such businesses to set up in less car-dependent locations. For businesses still located out of town, there would be an incentive to work with bus operators to encourage shoppers to travel by bus – another important government consideration given the recent falls in bus usage.

Countering the Myths

While the proposals have been welcomed by many, we wanted to take this opportunity to respond to a number of concerns raised about the levy:

- Each Workplace Parking Levy will be unique, because each place is unique. As a consequence, local authorities are best placed to design exemptions and criteria for their area, such as ensuring appropriate protections for low-income workers. Local authorities can set, and we would support, exemptions for small car parks below a certain size in order to not unfairly impact upon small businesses, as has been successfully implemented in Nottingham.
- A Workplace Parking Levy is progressive. People on the lowest incomes are unlikely to have access to a car, and therefore will be net beneficiaries anywhere this policy is introduced⁴. Car-

² <https://foe.scot/press-release/new-research-means-2500-deaths-a-year-in-scotland-are-from-air-pollution/>

³ <https://www.who.int/airpollution/ambient/health-impacts/en/>

⁴ Transport and Travel in Scotland 2017. <https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-2017/sct08183658301-31/>

ownership is linked with wealth. People on the lowest incomes disproportionately walk and use the bus, and revenue raised from the levy can be reinvested in active travel infrastructure and improving our bus network. However, people living in lower-income communities are more likely to be killed or seriously injured by cars and disproportionately shoulder the burden of the health impacts from air pollution⁵⁶.

- There is no evidence to expect a negative impact on business. The policy has been a success for business in Nottingham, with growth in employment and output, and a positive movement of inward investment indicators⁷.
- This is legislation to enable local choice. Any provisions for parking levies through the Transport Bill would only be enabling legislation - it would still be up to local authorities to determine whether and how to introduce them in their area, enabling local decision making.

We hope the above information is of use, and clearly explains why our organisations support the principles of a workplace parking levy. We hope your party will consider the evidence, and support the proposals for a Workplace Parking Levy. We would be happy to meet representatives of your party to discuss the opportunities presented by workplace parking levies at any point.

Thank you in advance.

Signed by

Dr Richard Dixon, Director, Friends of the Earth Scotland.

Kim Harding, Director, Edinburgh Festival of Cycling

Professor Tom Rye, Director of Transport Research Institute, Edinburgh Napier University

Paul White, Deputy Director, Confederation of Passenger Transport, Scotland

Colin Howden, Director, Transform Scotland

Ellie Harrison, Campaigner, Get Glasgow Moving

Iona Shepherd, Co-convenor, Go Bike

Stuart Hay, Director, Living Streets Scotland

Ian Findlay, Chief Officer, Paths for All

Sally Hinchcliffe, Pedal on Parliament

Alex Quayle, Senior Policy Officer, Sustrans Scotland

Lang Banks, Director, WWF Scotland

⁵ https://www.understandingglasgow.com/indicators/transport/road_casualties/child_road_casualties/deprivation

⁶ <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

⁷ Dale et al, "An evaluation of the economic and business investment impact of an integrated package of public transport improvements funded by a Workplace Parking Levy" Transportation Research Part A 101 (2017) 149–162