

Workplace Parking Levy

A stage 2 briefing by Friends of the Earth
Scotland

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**Friends of
the Earth
Scotland**

Friends of the Earth Scotland believes that giving councils the power to implement Workplace Parking Levies, where they feel it would be appropriate, will fulfil a number of goals shared across Scotland's political spectrum, including:

- Tackling the public health problems associated with air pollution, and bringing Scotland into compliance with its European legal obligations on air quality
- Reducing carbon emissions from the transport sector, contributing to efforts to tackle climate change
- Generate funding to make Scotland's transport system more equitable, and work for everyone

For this reason, Friends of the Earth Scotland encourages committee to vote for amendments 7, 8, 9, 9a, 9b, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, and urge committee members to reject all other amendments related to the workplace parking levy.

The workplace parking level has been widely discussed and debated. In our view, it is one of a range of tools councils need to change the transport mix in ways that we can all agree are necessary. As such, we urge members to ensure Councils are not restricted by overly prescriptive legislation. Supporting the above amendments would introduce locally appropriate, nationally approved, measures.

The need for change

Scotland needs a step change in its transport system to move away from a dependence on cars - particularly in urban areas. Air pollution, which is primarily from transport, is responsible for the early deaths of 2,500 people in Scotland each year¹. It causes heart attacks, strokes, and respiratory problems² - with children and the elderly amongst the worst affected. In January 2019, it was revealed that 7 sites in Scotland are still exceeding air quality legal limits, nearly ten years after the limits were implemented³⁴.

Meanwhile, our transport sector is the largest source of climate pollution in Scotland, and has barely changed since 1990, with the most recent figures showing transport emissions actually rising. Road traffic is now Scotland's single biggest source of greenhouse gas emissions⁵. A workplace parking levy presents the opportunity for councils to deliver the dual-benefits of reducing emissions whilst creating investment in transport.

¹ <https://foe.scot/press-release/new-research-means-2500-deaths-a-year-in-scotland-are-from-air-pollution/>

² <https://www.who.int/airpollution/ambient/health-impacts/en/>

³ <https://foe.scot/scotlands-most-polluted-streets-in-2018/>

⁴ Page 30/44. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0050&qid=1455033222658&from=EN>

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<https://www.gov.scot/binaries/content/documents/qovscot/publications/statistics/2019/06/scottish-greenhouse-gas-emissions-2017/documents/scottish-greenhouse-gas-emissions-2017/scottish-greenhouse-gas-emissions-2017/qovscot%3Adocument/scottish-greenhouse-gas-emissions-2017.pdf>

Proven success

WPLs have a proven record of delivering significant changes to travel habits. In their evidence to the Committee, Chris Carter from Nottingham City Council highlighted that their WPL had generated £53million which was used to improve their bus fleet, invested in Nottingham station, and was a crucial factor in improving the tram system.⁶ Nottingham City Council Transport system has since received a number of awards.⁷

The demand for the levy

A number of councils have asked for the powers to deliver this through a workplace parking levy⁸⁹. In evidence to the REC Committee, Councillor Anna Richardson said “*Glasgow City Council supports the principle of the power being passed to local authorities*”¹⁰. It is very unlikely that every council will use the WPL powers. The decision on using the powers, and the design of the scheme, is best made at a local level by local authorities - who know the needs and challenges of their area.

Workplace Parking Levy as an equality measure

The workplace parking levy has the potential to go some way to addressing the huge social inequality perpetuated by our travel status quo. People on the lowest incomes are least likely to have access to a car, and therefore will be net beneficiaries anywhere this policy is introduced¹¹. People on the lowest incomes disproportionately walk and use the bus, and will benefit from the revenue raised from the levy being reinvested in active travel infrastructure and improving bus networks¹². People living in lower-income communities are more likely to be killed or seriously injured by cars and shoulder the burden of the health impacts from air pollution, so would benefit from the reduction in car use brought about by the levy¹³¹⁴.

Amendments

Introducing the WPL

For all of the reasons set out above, we encourage MSPs to **vote for amendments 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, and 26**, which introduce the workplace parking levy.

To ensure adequate scrutiny over final WPL provisions, Friends of the Earth Scotland encourages MSPs to **vote for amendment 9b**. This would provide national oversight of the creation and amendment of WPLs. Two layers of democratic oversight underpinning WPLs also creates more long-term stability for any schemes that are implemented.

Simple legislation, empowering councils

Friends of the Earth Scotland has continuously argued that to be as effective and locally appropriate as possible, workplace parking levy legislation should be as simple as possible.

⁶ <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12119&i=109625&c=2178715&s=nottingham>

⁷ <https://www.nctx.co.uk/our-awards-and-achievements>

⁸ https://www.parliament.scot/S5_Rural/City_of_Edinburgh_Council_TB.pdf

⁹ <https://www.glasgow.gov.uk/councillorsandcommittees/viewPack.asp?c=P62AFQ0GZLZ3DNZLB253YXYXQAJ5I77DJ52AFQDNZLNT0GT1>

¹⁰ <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12119&i=109625&c=2178715&s=n>

¹¹ Transport and Travel in Scotland 2017. <https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-2017/sct08183658301-31/>

¹² As above

¹³ https://www.understandingglasgow.com/indicators/transport/road_casualties/child_road_casualties/deprivation

¹⁴ <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

National legislation should be designed to empower councils to design schemes, including operating hours, size of scheme, implementation, and exemptions, which work for their area.

For this reason, we would encourage MSPs to **vote against amendments, 7b, 7c, 8a, 8b, 8c, 8d, 10a, 10b, and 10c**. While we support the intentions of some amendments, these are decisions that should be made, and even enhanced, at a local level.

In his evidence to the REC committee, Chris Carter, from Nottingham City Council, stated that *“the beauty of the workplace parking levy is that it is flexible and allows different exemptions to meet needs. However, another strength of the levy is its simplicity. If too many exemptions are introduced, it becomes too complicated and a lot of the benefits are lost.”*

Should they see fit to do so, the Bill already allows local authorities to set exemptions at a local level, through powers granted in amendment 7. We would have concerns that setting some exemptions nationally and some locally risks creating two-tiers of exemption, and leave some groups being overlooked if councils see the national list as definitive. Any council looking to use the powers bestowed here should have to undertake a rigorous impact assessment; exemptions set nationally undermines this process.

For that reason we encourage MSPs to **vote against the amendments 16 N to 16AH and 17c to 17b** (in the order they appear in the marshalled list of amendments). While some of these have constructive aims, these are decisions which should be made at a local level by councils who know local transport needs.

For more information, contact:

Gavin Thomson
FoES Air Pollution Campaigner
gthomson@foe.scot | 0131 243 2714

Fergus Boden
FoES Parliamentary Officer
fboden@foe.scot | 0131 243 2721