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Humza Yousaf MSP  
Minister for Transport and Islands  
St Andrews House  
Regent Road  
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Dear Minister

### **Parking Levies and the Transport Bill**

We, the undersigned, understand that the Scottish Government does not plan to include provision for local authorities to introduce workplace or broader premises parking levies in its forthcoming Transport Bill. This would be a major missed opportunity and we ask you to ensure that this power is included in the Bill.

Our organisations have many different aims and objectives, but we all share a common aspiration for a safer, fairer, cleaner and healthier transport system for Scotland, where more of us walk, cycle, and use public transport and where fewer of us drive. We have a range of motivations for this including: to bring Scotland into compliance with its European legal obligations on air quality and protect public health, to reduce carbon emissions from the transport sector, to make Scotland's transport system more equitable and work for more people from a wider range of backgrounds, to make our urban centres more pleasant places to do business in, and to improve our physical, mental and social health as a nation.

Your transport strategy has the laudable commitment to “a sustainable transport system. One which lowers Scotland’s carbon footprint, improves air quality, and positions us to take advantage of the economic, as well as the environmental benefits, of innovation in this area.”<sup>1</sup>

Meeting this commitment will require a variety of different legislative and policy interventions. One crucial step is to enable local authorities to introduce parking levies, both for large workplaces and for car parks at other premises like shopping centres.

Many of us have seen you talk eloquently about the need to tackle over-easy car-based access, and you have acknowledged that abundant and cheap parking is a problem which needs to be tackled.<sup>2</sup>

### **WORKPLACE PARKING LEVY**

You have committed to considering legislation to allow local authorities to introduce workplace parking levies (WPLs) if they indicated they wanted such legislation.

Before the REC Committee on 27 February 2017, you said:

“We have said that we will explore workplace parking levies...There are some good examples of where the workplace parking levy is potentially working— in Nottingham (...) but it is at the very early stages. We have said that we will explore the option further with local authorities. We have not said that we will absolutely commit to a workplace parking levy in specific places because it is clear that it would happen as a result of conversations with local authorities and other partners. We will have those conversations and, if enabling legislation is needed, we can then have that conversation.”

Ten months later, at the ECCLR Committee on 5 December, you said:

“Workplace parking levies have been used in the United Kingdom—in Nottingham (...) and we mentioned them in the draft climate change plan. Once again, I am heartened by the number of local authorities that have approached me (...) and asked when the Government will introduce legislation on the issue. They are keen to explore that option, learn from Nottingham and bring such levies to their local authority. I am pleased that there is a real desire to lead on the issue in Scotland.”

In its evidence to the ECCLR Committee on air quality, the City of Edinburgh Council named WPLs as a policy to “assist with addressing the air quality issue” but pointed out that legislative changes were needed.<sup>3</sup>

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1 Scottish Draft Budget 2018/19

2 Before the ECCLR Committee on 5 December 2017, you said; “Frankly, one of the biggest issues is the private motor car. For example, the centre of my home city of Glasgow has 12,000 cheap car-parking spaces; if I were to park on the fourth floor of the Buchanan Galleries car park, I could almost, if I wanted to, drive my car right up to a till in John Lewis, and the cost would be almost the same as that of an all-day bus ticket on a Sunday. There are challenges that we have to tackle.....”

3 ECCLR Inquiry into air quality in Scotland, written submission from The City of Edinburgh Council

Nottingham's WPL has been a huge success. A 2016 report found: "In the first three years of operation, the workplace parking levy raised £25.3 million of revenue, all of which has funded improvements in the city's transport infrastructure, including the largest fleet of electric buses. Recent research indicates that the levy has significantly contributed to a 33% fall in carbon emissions, and a modal shift which has seen public transport use rise to over 40%."<sup>4</sup>

Councillor Nick McDonald, Nottingham City Council's Portfolio Holder for Business, Growth and Transport has described its success as follows:

"The Workplace Parking Levy has allowed Nottingham City Council to deliver Europe's largest fleet of electric buses, new tram routes and £6.1million of improved cycling routes to provide great alternatives to using cars to get around the city. The result is that we are continually reducing the environmental impact of transport in Nottingham."<sup>5</sup>

At present, local authorities like the City of Edinburgh Council cannot introduce their own parking levies and achieve the same kind of successes as Nottingham. Only the Scottish Parliament can enable this by introducing legislation. The Transport Bill is a unique opportunity to introduce the necessary legislation and to achieve the Scottish government's aspirations to improve our transport system, our public health, our environment and urban spaces.

## **PREMISES PARKING LEVY**

While England has seen only a WPL, we urge Scotland to go even further than the rest of the UK. In addition to introducing provision for WPLs, we urge you to introduce a bolder, wider, more innovative policy, whereby local authorities have the power to charge parking levies on *all* types of premises with over a certain minimum number of parking spaces – it would be up to the local authority to decide which categories of premises to levy.

It is hard to see why only parking at workplaces would be levied when out-of-town shopping centres, supermarkets, and private leisure centres, which foster extensive car use, escape. It is notable that the reference you made in your evidence to the ECCLR committee to the overabundant parking at Buchanan Galleries in Glasgow would not fully be captured by a workplace-only levy; a premises parking levy would also be required.

This wider levy would also enable local authorities to help protect town centres - a major government objective - since a premises parking levy on out-of-town stores would over a period of time 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

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4 WWF Scotland, "International Case Studies for Scotland's Climate Plan," Workplace Parking Levy, Nottingham, UK

5 As above

with bus operators to encourage shoppers to travel by bus – another important government consideration given the recent falls in bus usage.<sup>6</sup>

## **FURTHER RATIONALE FOR ENABLING PARKING LEVIES**

- Parking levies are one of the most effective and publicly acceptable ways to manage the use of private cars since the charge is levied on the premises, not on the individual. Premises can then respond by measures to encourage modal shift by customers and staff, instead of or as well as passing on some of all of the charge to the car user.
- Revenue raised from parking levies can be reinvested back into improving local transport infrastructure, thereby serving not only to just discourage unnecessary car use but also to make public transport and active travel safer, more accessible and more attractive.
- Parking management is much more readily accepted than road user charging, which the Scottish Parliament has already legislated for.
- Concerns over the potential negative impact of parking levies on investment have not been borne out by evidence. Recent research into Nottingham's WPL has found that it is not having a negative impact on inward investment. Nottingham has growth in employment and output, and a positive movement of inward investment indicators, and is still attractive to investors.<sup>7</sup>
- 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.

## **THE TRANSPORT BILL**

For enabling legislation not to be introduced as part of the Transport Bill would be a huge missed opportunity. The Transport Bill offers huge significant potential for local authorities.

Therefore we urge you to grasp this opportunity to improve the Transport Bill by including provision for both workplace and broader parking levies now before the Bill is introduced.

Thank you in advance.

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<sup>6</sup> Transform Scotland, "Buses debate: Time for Government to tackle the key causes of bus decline" (21 January 2018) <http://transformscotland.org.uk/blog/2018/01/31/buses-debate-time-for-government-to-tackle-the-key-causes-of-bus-decline/>

<sup>7</sup> 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

Signed:

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