

# Response ID ANON-WTKH-FWC1-F

Submitted to Workplace Parking Levy (WPL)  
Submitted on 2024-02-05 21:19:11

## Introduction

### 1 Your details

First name:

John

Surname:

Robson (on behalf of Spokes Lothian Planning Group)

Email address:

johnrobson87@gmail.com

Postcode:

EH10 5HZ

Yes, I consent to being contacted about this consultation:

Yes

## Objectives and outcomes

### 2 What does Edinburgh need to invest in to improve the sustainable and active travel transport offer for people who visit and work in the city?

Expanding e-bike access, City bike hire scheme, Active travel infrastructure e.g., walking and cycling paths, Road conditions for vehicles and bikes

Other (please state):

### 3 What else does Edinburgh need to improve transport for people working in the city?

Please provide comments:

Edinburgh must invest in an active travel network suitable for 8 - 80 year olds to travel independently across the city everyday of the year 24/7. This would reduce the need for many short motor vehicle and public transport trips. As Edinburgh Council declared a Climate Emergency in 2019, setting an ambitious target for the city to become net zero by 2030 and aiming to reduce car journey kilometres by 30% in the same period the city must act in low polluting active travel as soon as possible.

A public cycle hire scheme would help to provide convenient eBike access for many and reduce pressure on contest public cycle storage facilities. However for private cycle storage the city must also invest in the oversubscribed cycle hangar scheme to expand this to more areas across also socio-economic backgrounds.

A full active travel network must be safe to all ages and abilities linking all origins and destinations as much as it is possible to travel by car already to make it more attractive and safer.

## Congestion and air quality

### 4 To what extent are you concerned or not about the levels of congestion in the city?

Very concerned

Please tell us why.:

The City of Edinburgh Council has set an ambitious target to reduce car journey kilometres by 30% in the same period. WPL will help to reduce private car trips which should make the groups listed able to benefit from safer streets, cleaner air, lower public transport delays. Many of the groups like children and disadvantaged do not have access to private motor cars and as such should benefit most from a reduction in car dependency in society as a whole.

### 5 To what extent are you concerned or not about air quality in the city having an impact on your health?

Very concerned

Please tell us why.:

Levels of air pollution across Edinburgh are too high and need to be addressed urgently, particularly for the health of the most vulnerable in society such as children, elderly people, disabled people and people who have long-term respiratory conditions like asthma. The urgency to address air pollution is heightened due to the fact that Scotland is suffering from the after effects of a respiratory pandemic, as well as in a global climate crisis. There has been a legal responsibility to meet the minimum safe levels of air pollution since 2010 - fourteen years later we are still seeing dangerous levels of particulate

matter across designated Air Quality Management Areas (AQMAs) around the city.

## Travel behaviour

6 Do you use your vehicle to commute to work or place of study?

Do not work or study

## Exemptions and impact

11 If the council were to introduce WPL, what discounts or exemptions would you like to see?

Please comment below:

No further exemptions to the WPL should be introduced.

12 What do you believe are the positive impacts from introducing a WPL in Edinburgh?

Please comment below:

Spokes Lothan consider a WPL will generate revenue for investment in active and public transport projects. Walking, wheeling and cycling will be made more or less attractive by traffic levels – both across the whole local authority and even more so in local areas with particular employment/ commuter characteristics. The details of a WPL scheme will affect this, for example through charging levels and through any proposed local exemptions.

13 What do you believe are the negative impacts from introducing a WPL in Edinburgh?

Please comment below:

Spokes sees no negative impacts on cycling / active travel in Edinburgh from the introduction of a WPL.

14 What support could be given to businesses to help them manage and reduce their supply of free commuter parking?

Please comment below:

Spokes believes increasing secure cycle facilities, cycle routes to and from workplaces across the entire city, adding shower facilities, clothes drying cabinets will also be of help. Offering a business support service including access to travel to work planners encouraging and facilitating active travel would also assist. Financial subsidies (or long loans) for the least able to afford bicycles and adapted / non-standard cycles would also assist many who think they can't active travel to work who could if given the right equipment.

Spokes also considers that a public eBike and standard cycle hire scheme would be of benefit to encourage mixed public and active transport trips across the city for commuting. It also allows trials for those who want to try commuting by bike at times without committing to buying a bike.

## Charge levels

15 Which of these benchmarks should be used to determine the most appropriate annual charge level for a WPL in Edinburgh?

Use the annual charge level for a WPL in other UK cities as a benchmark, An annual charge that raises a specific amount that has meaningful impact in enabling delivery of transport improvements

Other (please specify):

16 If the cost of public transport fares was used as a benchmark for the annual cost of the WPL, what should the WPL charge per year be?

Be more than this value

17 Please comment on whether there should be the same charge level across all areas of Edinburgh or a different charge in specific areas of the city.

Please comment here:

All areas should have the same charge.

## Geography

18 How many miles do you travel from your home to work or place of study in Edinburgh?

Approximate miles traveled one way.:

n/a

19 Do you think that an Edinburgh WPL should apply across all of the local authority boundary?

Yes

If no, please specify the area:

## Other comments and suggestions

20 Please use the space below for any other comments or evidence you would like to provide on Edinburgh's plans to develop a WPL proposal.

Please comment below:

Spokes appreciates that the Transport Act does not allow charges on premises for customer spaces. However we urge that the next legislative opportunity is taken to correct this omission. For example, there should be premises parking levies for uses such as those listed below;

- Large scale retail parks such a supermarkets, leisure centres and other business with large customer parking which, whether or not deliberately, effectively promotes car use other other modes. by making it the most convenient option for the distances and locations chosen.
- Airport, ferry, train station, bus station short and long stay parking for passengers in order to promote joined up public transport or active travel from door to door.
- Public events such as music festivals or drive-in movies which induce short car trips
- Drive-thru businesses where customers don't park but do travel by car and other modes such a bicycle aren't allowed to use the drive-thru.

Because not all workplace car spaces are covered by the WPL due to the proposed threshold, there is a significant risk of accidental or deliberate undercounting of liable spaces. Spokes would like reassurance that this has been considered.

Some buildings that are workplaces have shared car parks for multiple businesses. Therefore Spokes would like these to be included in the scheme even if the individual businesses within the building have less than the threshold of parking spaces.

## About you

21 What is your sex?

Prefer not to say

22 What is your age?

Prefer not to say

23 Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

Prefer not to say

24 Does your condition or illness/do any of your conditions or illnesses reduce your ability to carry-out day-to-day activities?

Prefer not to say

25 Do you have caring responsibilities?

Prefer not to say

26 Which of the following best describes you situation?

None of the above

## Feedback about this engagement process

33 To what extent do you agree or disagree with the following statements about this engagement exercise?

Feedback about engagement process - I was given all the information that I needed to have my say.:

Feedback about engagement process - This engagement exercise was clear and easy to understand.:

Feedback about engagement process - I was given the opportunity to have my say.:

Please provide any other comments or suggestions you may have about this engagement process.:

This submission is on behalf of Spokes Lothian Planning Group.

We will also email this response when received to the email address to ensure it is considered.

John Robson (on behalf of Spokes Lothian Planning Group)