



FOR A HAPPIER,
HEALTHIER SCOTLAND

Consultation Response

Edinburgh Workplace Parking Levy

2/2/24

If you have any questions about this response, please contact our policy team:
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Who We Are

Paths for All is Scotland's walking charity. Established in 1996, we work in partnership with 30 national organisations with a shared vision of a healthier, happier, greener Scotland, where everyone can be active every day. Walking is the easiest and most accessible way to be active, and our work to change the way people move, travel, and enjoy life in Scotland is focused on the following three themes:

- Walking is for everyone.
- Walking is for everywhere.
- Walking is for every day.

Our [strategy](#) sets out our vision for tackling physical inactivity, poor mental health, increased health and transport inequalities and the climate emergency.

Our Response

We welcome the opportunity to respond to this consultation.

Neither of the online surveys seem appropriate for our response as we are neither a resident nor a business in Edinburgh. As an NGO with a Scotland wide role in relation to promoting walking and wheeling we would like to make some comments.

As we do not have the local knowledge to comment on the detailed arrangements in Edinburgh our comments are general in nature and related to our area of interest as an organisation. We would be happy for these comments to be made publicly available.

We gave evidence to the Rural Economy and Connectivity Committee when the legislation was being considered in Parliament. These views still stand.

https://archive2021.parliament.scot/S5_Rural/RECC_WPL_Paths_for_All_.pdf

We would welcome the introduction of this measure by The City of Edinburgh Council.

Introduction

Paths for All considers that the proposed Workplace Parking Levy is a progressive intervention and entirely in keeping with the Government's ambition to reduce greenhouse gas emissions, improve health and reduce air pollution.

Our evidence expands on the following themes:

- Equality
- Democracy
- Health
- Climate Change

Equality

Poor people do not generally own cars.

- Transport Scotland statistics show that the higher a household's net income, the more likely it is that employed adults within that household will drive to work.¹
- Most people in employment living in households with a net income of less than £15,000 do not drive to work, with many not even having the option of doing so.²
- Most people who drive to work and park in dedicated workplace car parks are likely to be from middle- and higher-income households.³

Car parks cost money. Land availability, construction and maintenance is only part of it. More pipes and cables for electricity, gas, water, broadband are required to pass underneath car parks before they reach their destination. Car parks increase storm water run-off increasing the likelihood of flooding, with a consequential impact on insurances. These extra costs are met through increased rents, higher service costs and more expensive goods. Everyone pays these increased costs, there is no choice.

A consequence of the Workplace Parking Levy is that it will reduce car use.

- Reducing motorised vehicle traffic disproportionately benefits those living in deprived communities. People in deprived communities are both more likely to

¹ <https://spice-spotlight.scot/2019/05/10/the-proposed-workplace-parking-levy/>

² <https://www.transport.gov.scot/publication/scottish-transport-statistics-no-37-2018-edition/sct01193326941-14/#tb1117>

³ [https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-2017/sct08183658301-32/Consultation Response: Edinburgh Workplace Parking Levy – 2/2/24](https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-2017/sct08183658301-32/Consultation%20Response:%20Edinburgh%20Workplace%20Parking%20Levy%20-%202/2/24)

experience higher levels of local air pollution from vehicles and are more susceptible to the effects of that pollution.⁴

- People living in the most deprived communities, particularly children, are up to five times more likely to be killed in traffic collisions than those living in the least deprived areas.⁵

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 introduced.

It is democratic.

This is a solution that reflects Scotland's priorities and the devolved powers of the Scottish Government. For example, UK public policy has seen fuel duty remain constant for the last nine years, costing the UK Treasury approximately £10 billion/year. The UK government has overseen the cost of public transport rising by 60% in the last 10 years compared to a 40% increase in the cost of running a car. (Compared to a 20% increase in average wages in the same time frame).⁶

This is an opportunity for councils 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.

Local authorities should have the power to shape the transport network 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 the decision is best made by those who know the needs, and transport challenges, of the local area.

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 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.

The benefits of the proposal – health and climate change

The proposal is in line with the Transport Scotland Transport Hierarchy as set out in the National Transport Strategy.⁷

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http://ec.europa.eu/environment/integration/research/newsalert/pdf/air_noise_pollution_socioeconomic_status_links_IR13_en.pdf

⁵ <https://travelwest.info/project/ee-153-child-pedestrian-casualties-and-deprivation>

⁶ <https://racfoundation.wordpress.com/tag/cost-of-motoring/>

⁷ <https://www.transport.gov.scot/our-approach/strategy/national-transport-strategy/#>

Air pollution, which is primarily from transport, is responsible for the early deaths of 2,500 people in Scotland each year. It causes lung cancer, asthma, heart attacks, strokes, and respiratory problems. Any efforts that reduce car use will reduce air pollution and should be encouraged.

Investing in, and encouraging, walking, cycling and public transport will encourage more people to be active everyday and contribute to meeting the Governments objectives contained in the Physical Activity Delivery Plan and National obesity Strategy.

A workplace parking levy is potentially a useful tool in acting on carbon emissions. It is particularly important in the context of the Committee on Climate Change Net Zero report on the UK's contribution to stopping global warming, the First Minister announcing a Climate Emergency and the recent statement on the Global Climate Emergency in the Scottish Parliament by the Cabinet Secretary for Environment, Climate Change and Land Reform.^{8 9}

This type of proposal has been shown to work.

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.

- In the UK, only Nottingham has introduced a WPL. Parking levies are also found in cities including Perth (Australia), Sydney, Melbourne and Vancouver.¹⁰¹¹
- Research into the impact of the Nottingham WPL on traffic congestion concluded that there is "...a statistically validated link between the introduction of a WPL and a reduction in congestion."¹²
- Research into the economic and business investment impact of the public transport improvements funded by the Nottingham WPL concluded that public transport developments funded by WPL revenue had a positive impact in attracting inward investment to the city.¹³

In its first three years, the levy in Nottingham 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%. The revenue from the levy has allowed

⁸ <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

⁹ <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12097&i=109414>

¹⁰ <https://www.nottinghamcity.gov.uk/information-for-residents/transport-parking-and-streets/parking-and-permits/workplace-parking-levy/>

¹¹ https://dspace.lboro.ac.uk/dspace-jspui/bitstream/2134/17632/1/Nottinghamm_WPL_Hypoth_Paper.pdf

¹² <https://www.sciencedirect.com/science/article/abs/pii/S0967070X16306400?via%3Dihub>

¹³ <https://www.sciencedirect.com/science/article/pii/S0965856415302986?via%3Dihub>

Nottingham to deliver Europe's largest fleet of electric buses, create new tram routes, and invest £6.1 million in improved cycle routes.¹⁴

Conclusion

We would welcome the introduction of this measure by The City of Edinburgh Council.

Scotland has declared a Climate emergency; it has some of the worst air pollution in Europe and is facing an obesity epidemic. No one policy shift will solve these issues, it will take many. The Workplace Parking Levy is just one of many policy changes that will help make Scotland a healthier, happier country. The questions must be asked- if not this action, then what will be done, and if not now, then when?

There is no easy solution to the climate emergency, and many solutions may be unpopular. We will not meet our climate obligations by continuing to do the same thing, or doing the wrong thing, only better. Responding to a climate emergency will require many similar decisions to this one.

Active Travel

Our vision is for walking and cycling to be the natural choice for short journeys, creating a healthier, socially inclusive, economically vibrant, environmentally friendly Scotland.

<https://www.pathsforall.org.uk/active-travel>

National Survey of Attitudes to Walking and Wheeling

You may find the 2023 National Survey of Attitudes to Walking and Wheeling in Scotland useful.

The survey has provided an updated picture of the Scottish adult population's participation and attitudes to walking, updating information last collected in 2019 and complementing other sources of information such as the Scottish Household Survey and Scotland's People and Nature. The study has also included a follow up qualitative stage with 24 in-depth interviews undertaken with a cross section of adults in different population segments defined from the survey data.

To find out more about attitudes to walking, read the [full survey report](#) or take a look at our [summary infographic](#).

¹⁴ 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>
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Paths for All Partnership is a recognised Scottish Charity No: SC025535 and a Company Limited by Guarantee No: 168554 incorporated 19 September 1996 at Companies House, Edinburgh

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