

SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE

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Date:	15/05/19
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Topic of submission:	Transport Bill — Workplace Parking Levy amendments

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RURAL ECONOMY AND CONNECTIVITY COMMITTEE

TRANSPORT (SCOTLAND) BILL – WORKPLACE PARKING LEVY AMENDMENTS

SUBMISSION FROM **TRANSFORM SCOTLAND**

Introduction

In our earlier written and oral evidence to the Committee, we broadly welcomed the intentions and content of the Bill as introduced to the Parliament.

However, our written evidence (28/09/18) indicated that we saw the Bill as introduced as a “missed opportunity” in so far as it failed to “provid[e] Local Authorities with suitable powers for implementing road traffic demand management.” We called for the Bill to be amended to include enabling powers for Private Non-Residential Parking Levies (‘PNR levies’), of which the Workplace Parking Levy (WPL) is the best known.

The Bill includes a wide range of powers, including on bus services, roadworks, responsible parking and improving air quality. A key component of any set of policies which aims to reduce emissions, discourage inconsiderate parking, and encourage bus use, is, or should be, limiting demand for travel by modes which pull against these aims. Through the inclusion of WPL, the Bill now brings forward a powerful measure to assist Local Authorities in this wider task. As such, we strongly welcome and support the amendments now brought forward to provide powers to Scottish Local Authorities to implement WPL schemes.

Rationale

Scotland’s urban centres suffer from a range of problems brought about by the excessive use of private cars. This includes, but is not limited to: congested streets; damaged reliability and punctuality of public transport services; poor air quality and road safety and the impacts on public health which follow; unsustainable levels of climate emissions; and a generally degraded urban realm.

The lack of action by successive administrations, at national and local levels, has worsened these trends — to such an extent that, by way of example, transport is now the largest source of climate emissions, with private car use accounting for the majority of these emissions.

Investment in walking, cycling and public transport alternatives will help to alleviate some of these problems — but we are certain that significant progress cannot be made in the reversal of these trends unless and until action is taken to implement road traffic demand management measures, and WPL schemes are one example of what should be done here.

At a time where Local Authority budgets are increasingly stretched, and funding for sustainable transport infrastructure (such as bus lanes, segregated cycle routes and pedestrianised areas) is limited, parking levies offer a clear solution to fund improved

transport infrastructure whilst simultaneously tackling the problems listed above. *(The many benefits of WPL schemes are clearly set out in the Sustrans Scotland evidence paper submitted to the Committee. As such, we will not labour the point here, and are content to support the views of Sustrans as set out in its evidence paper.)*

Support for WPL

Scotland's Local Authorities through its representative body COSLA have called for enabling powers to be provided.¹ Both The City of Edinburgh Council and Glasgow City Council have indicated that they are actively developing scheme proposals in the hope that enabling powers are provided, while Dundee City Council has indicated that it would consider WPL as a supporting measure for its LEZ scheme.²

Furthermore, the Committee has received supportive written evidence from public transport operators (Lothian Buses, Stagecoach, and the bus industry body CPT), from Regional Transport Partnerships (Nestrans & Sestran), and from the third sector (Friends of the Earth Scotland, Get Glasgow Moving, Living Streets Scotland, Spokes & Sustrans). A number of other individuals and organisations, including Professor Tom Rye, the Director of Edinburgh Napier University's Transport Research Institute, are also on record as supporting WPL.³

Finally, we note that the REC Committee itself has previously indicated its support for Workplace Parking Levies. We made the case to the Committee for road traffic demand management schemes in our written evidence (02/02/17) on the then draft Climate Change Plan (draft RPP3), arguing that the draft Plan was too weak on transport. We were thus pleased to see the Committee recommend in its report (March 2017) that "greater consideration is given to policies that will control demand and encourage modal shift away from private cars." The Committee then went on to state its opinion on WPL specifically:

"The Committee is of the view that demand management measures such as low emission zones and workplace parking levies have potential to make a significant emissions reduction contribution. It therefore calls on the Scottish Government to consider whether these measures should be afforded increased prominence in the final CCP."

The Committee's recommendations on road traffic demand management (and WPL specifically) were ignored by the Scottish Ministers in its final version of the Climate Change Plan (March 2018). However, it is pleasing that WPL powers are now belatedly being promoted by the Scottish Government in the context of the Transport Bill, and this is no doubt at least in part due to the recommendations brought forward by the Committee in its March 2017 report.

1 <http://www.cosla.gov.uk/news/2019/01/cosla-budget-statement>

2 <https://www.dundee.gov.uk/reports/reports/353-2017.pdf>

3 <https://foe.scot/wp-content/uploads/2019/02/Workplace-Parking-Levy-Letter-to-Party-Leaders.pdf>

Existing WPL schemes & schemes in development

The success of the Nottingham WPL scheme is well documented. We would direct the Committee to the presentation made by Sue Flack, Director of Planning and Transport at Nottingham City Council from 2012 to 2016, to the Transform Scotland event held in Edinburgh City Chambers in October 2018, for a more full description of the scheme than can be presented here.⁴

Development of WPL in the UK is however not limited to Nottingham. Transport for London is providing guidance and support for London boroughs (due to go out to consultation in June), and are considering implementing a WPL in one or more of their Opportunity Areas (growth areas). Hounslow, Sutton and Merton, and Camden are all considering schemes, while others are also known to be doing so but plans are not yet in the public domain.

Outside of London, Birmingham, Reading, Oxford and Leicester are all progressing schemes, while a number of others are also considering schemes, but, again, are not yet in the public domain. In the Appendix, we present some summary information on both the Nottingham scheme⁵ and two examples from Australia in order to provide the Committee with a wider description of how WPL schemes can be used.⁶

Specific comments on the amendments

Given the short timescale provided for the preparation of evidence, at the time of writing we have yet to consider the proposals in detail. However, our interim thoughts are as follows:

1. We welcome the '8 week standstill period' approach.
2. The section on 'consultation' is much more forceful than the England & Wales and London legislation, with Local Authorities having to prepare a consultation statement and impact studies. We welcome this.
3. We do not agree with the provision to exempt NHS premises as part of the legislation; should the exemption be required, we consider that this should rather feature in accompanying guidance.

⁴ <http://transformscotland.org.uk/blog/2018/10/16/sue-flack-talk-workplace-parking-levy-in-practice-experience-in-nottingham-and-elsewhere/>

⁵ Sources: (i) Nottingham City Council <https://www.nottinghamcity.gov.uk/transport-parking-and-streets/parking-and-permits/workplace-parking-levy/>, (ii) Campaign for Better Transport 'Nottingham Workplace Parking Levy - Briefing Paper' <http://www.cbttthoughtleadership.org.uk/WPL-Briefing-Nottingham.pdf>, (iii) WWF Scotland (2016) 'International Case Studies for Scotland's Climate Plan - Workplace Parking Levy, Nottingham, UK', (iv) Transform Scotland personal correspondence with Sue Flack.

⁶ Sources: Department of Transport Western Australia <https://www.transport.wa.gov.au/projects/perth-parking.asp> and Transport for New South Wales <https://www.transport.nsw.gov.au/programs/parking-space-levy>

Appendix: Comparisons of WPL schemes in Nottingham, Perth (Australia) & Sydney

Scheme	Parking	Objectives	Revenue Uses
<p>Nottingham – Workplace Parking Levy</p> <p>Boundary Area City of Nottingham (administrative area of Nottingham City Council)</p> <p>Implemented 2012</p> <p>Approx Annual Revenue £9M</p>	<p>Description Occupied private non-residential off street workplace parking.</p> <p>Exemptions</p> <ul style="list-style-type: none"> • Small businesses with 10 or fewer liable parking places • Blue Badge holder parking places • Front-line NHS • Occasional business visitors • Motorbikes • Fleet and delivery vehicles 	<ul style="list-style-type: none"> • Reduce Congestion. • Encourage modal shift to more sustainable modes. • Fund transport infrastructure. • Protect the city's commerce and inward investment. • Improve the city's environment and sustainability. 	<ul style="list-style-type: none"> • Introduced for transport. • Light rail expansion. • Link bus services. • New fleet of 45 electric buses introduced. • Redevelopment of Nottingham Railway Station. • Implementation of a smart card initiative. <p>Support to businesses</p> <ul style="list-style-type: none"> • Workshops offering sustainable travel advice and information to staff employees; and • Grants schemes for employers for car park management and cycle facilities.
<p>Perth – Parking Licence Fee</p> <p>Boundary Area City Centre</p> <p>Implemented 1999</p> <p>Approx Annual Revenue AUS\$30M</p>	<p>Description All non residential parking bays that are in use.</p> <p>Exemption</p> <ul style="list-style-type: none"> • Disabled spaces • Loading Bays • Public service bays • Businesses <6 space • Spaces incidental to primary business activities. 	<ul style="list-style-type: none"> • Reduce traffic congestion by inducing a shift from private car to other modes of transport. • Using funds from the scheme to provide a Central Area Transit bus system. 	<ul style="list-style-type: none"> • Introduced for transport CAT bus system free transit zone. • To manage traffic congestion on inner city streets as the city rapidly grows to improve amenity for residents, businesses and visitors to central Perth. • Improving inner city cycling facilities to meet the growing need for convenient, safe cycling routes, and helping to make cycling a safe and attractive alternative transport mode.
<p>Sydney – Parking Space Levy (PSL)</p> <p>Boundary Area City Centre and five other outlying business districts</p> <p>Implemented 1992</p> <p>Approx Annual Revenue AUS\$97M</p>	<p>Description Off street private non residential parking, occupied or unoccupied, does not apply to public car parks.</p> <p>Exemption</p> <ul style="list-style-type: none"> • Disabled spaces • Loading Bays • Public service bays • Spaces incidental to primary business activities • Retail, restaurant, hotel parking, etc in outlying areas. 	<ul style="list-style-type: none"> • Discourage car use. • Fund new public transport infrastructure and initiatives. 	<ul style="list-style-type: none"> • Introduced for transport. • Interchanges, bus/rail/ferry. • Park and Ride. • Rapid bus only transit way. • Light rail. Electronic passenger information system.