

Transport and Environment Committee

10.00am, Thursday, 23 May 2024

Edinburgh Workplace Parking Levy – Engagement Results

Executive/routine
Wards

Executive
All

1. Recommendations

- 1.1 Transport and Environment Committee is asked to note:
 - 1.1.1 The results of the public engagement exercise on the introduction of a Workplace Parking Levy (WPL) in Edinburgh;
 - 1.1.2 The feedback which has been summarised in Appendix 1, and further feedback from discussions with businesses and representative groups in Appendix 2; and
 - 1.1.3 The proposed timescale for further consideration of a WPL (Appendix 3).
- 1.2 Committee is also asked to consider the proposed next steps (paragraph 5.1) and the funding options available to continue this work with the allocation of up to £100,000. If Committee agrees to support progressing to the next stage, this report should be referred to Finance and Resources Committee to identify funding for this (as outlined in paragraphs 6.4 and 6.6). If the use of reserves is agreed by Finance and Resources Committee, this will require to be referred to the Council for ratification.

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Edinburgh Workplace Parking Levy – Engagement Results

2. Executive Summary

- 2.1 This report provides an update on the engagement on the Edinburgh Workplace Parking Levy (WPL). Committee is asked to note the findings and agree the next steps should they wish to continue to progress this work.

3. Background

- 3.1 The Council's City Mobility Plan and 2030 Climate Strategy both pledged to consult on the introduction of a WPL in order to support targets such as a 30% reduction in car kilometres and progressing towards net zero by 2030.
- 3.2 In September 2023, Committee agreed that the Council should undertake further engagement to establish in more detail the views of residents on the introduction of a WPL.
- 3.3 While WPL was included in previous consultation and engagement activities around the development of the City Mobility Plan, this is the first detailed WPL engagement exercise undertaken for the city. A proposal for an Edinburgh WPL with an impact assessment is required after this, followed by a consultation on the design of the specific scheme for Edinburgh.
- 3.4 For this engagement activity, an online survey was hosted on the Council's Consultation and Engagement Hub and paper copies of the survey were available on request. In person sessions were also held with key stakeholders including schools, business representative groups, and trade unions.
- 3.5 The power to introduce a WPL was given to councils from the Transport (Scotland) Act 2019 with the publication of guidance and regulations in June 2022.
- 3.6 This means the Council can decide whether it wants to introduce a WPL and design the levy to suit its own needs. This includes defining the area to which it applies; setting the annual charge level that applies to the liable parking places; adding exemptions; and deciding which initiatives or projects to spend any raised income

on. Expenditure can be on revenue or used to fund capital expenditure on infrastructure.

4. Main report

- 4.1 This engagement is the first time the Council has publicly asked for views on an Edinburgh WPL. A further 12-week statutory consultation and impact assessments would be required should members want to proceed beyond this initial phase. The stages for the further development of an Edinburgh WPL are provided in Appendix 3.

Information on Edinburgh WPL survey

- 4.2 The online survey ran between 15 November 2023 and 3 February 2024 and received 2,621 responses. While the majority of responses were from individuals, although 34 respondents indicated that they were responding online on behalf of an organisation. Further information on the respondents to the online survey is summarised in Appendix 1.
- 4.3 The response rate to the survey differs from the demographic profile of Edinburgh, with the response rates typically from those who use their car to travel to work, and from people that work in the public sector.

Identified issues and opportunities for an Edinburgh WPL

- 4.4 Overall, 76% of respondents were either a bit concerned, concerned or very concerned about congestion in the city. Concerns about congestion were higher amongst those who did not use a private vehicle, or car, to commute versus those who did. 48% of respondents not using a car were very concerned with levels of congestion, compared to 15% of those who used a car to commute to work or study. Those respondents travelling shorter distances were also more likely to report higher concerns about congestion than those travelling longer journeys. It was also mentioned that congestion is negatively impacting on the city's public bus services, causing issues with the reliability of services and journey times and therefore may discourage people to move from private car to public transport.
- 4.5 Some responses from businesses highlighted that a WPL in Edinburgh would overlap with the introduction of the Low Emission Zone (LEZ), which is due to begin in June 2024. Businesses and employee representative groups were concerned about the potential impact of the additional cost on lower income workers or workers who have no better alternative than the car to travel to work. Others added that a WPL would not be a straightforward policy to apply and that many employers would benefit from support from the Council to better understand their liability.
- 4.6 Those more in favour of a WPL in principle highlighted that the economic cost of motoring is undervalued especially when free parking is provided for journeys to work or study. They argued that a WPL helps transfer the social cost of congestion

onto those journeys that contribute the most to congestion at peak-travel times. They emphasised that the WPL may create new revenue for transport investment that then support solutions to help meet national transport, air quality and health priorities.

- 4.7 The survey asked what Edinburgh needed to improve to encourage sustainable transport use and active travel offer. 59% of respondents said road conditions, while 54% felt that more direct transport links were required and 33% thought better cycling infrastructure would help. Respondents reported that longer journey times, lack of public transport options, lack of safe cycling routes and cost of public transport were the main barriers to choosing alternative modes of travel for their commute.

Feedback on design of the Edinburgh WPL

- 4.8 A range of questions were asked to help inform the Council on the design of a WPL in Edinburgh, if a decision was made to introduce or to examine the WPL option further. The questions focussed on setting the annual charge level for each liable parking place, the area that it could apply to, the exemptions, the impact and details on the revenue plan.

Charge Level

- 4.9 The charge level refers to the annual fee that could be levied at the employer for each liable workplace parking place that is used by a vehicle. Views on charge levels were mixed. It was suggested that any charge needed to be affordable and either means-tested or based on an employer's size and revenue. Around one in four respondents did report that a the WPL charge should be comparable with the cost of an annual bus fare. 54% of respondents felt the WPL charge should be less than the annual cost of public transport fares, although the position for the costs varies by respondent profile.

Boundary

- 4.10 70% of respondents did not think a WPL should be applied across the whole local authority boundary, with suggestions including just the city centre, the LEZ or a zoned approach to charging. 29% of all respondents agreed that a WPL should apply across the whole of the local authority area.
- 4.11 Respondents also felt that this was a difficult judgement to make and that consideration about the location of larger car parking places in the city will inform decisions. Some also called for a higher rate to apply to the city centre.

Exemptions

- 4.12 While the exemptions and discounts Nottingham City Council provide seemed reasonable to respondents (such as a blue light discount and small businesses who provide less than 10 parking spaces) some felt these should be extended to employers based outside of the city centre. Other exemption types raised included

schools and other learning institutions, prisons, the third sector and key workers, who have caring responsibilities, as well as for those who work unsociable hours or who work in locations where there is no suitable alternative to travel.

Impacts

- 4.13 The current financial landscape and cost-of-living crisis was highlighted by respondents as a reason for not supporting a WPL. Some businesses highlighted that workers and organisations are already struggling and that those in the public sector should be made exempt from any charge. Other views expressed were concerned about the impact of low income workers if the costs are passed on from the employer, or people who do not have good access to public transport due to location or hours of work.
- 4.14 However, it was recognised that the investment in transport from a WPL may help address accessibility issues and in general help reduce the use of the car for some journeys. This may then contribute towards a positive impact on congestion and pollution levels, air quality and the safety of roads. Most who replied to the survey were concerned about congestion. 76% of all respondents said that they were concerned about congestion levels in the city and 60% of all respondents had concerns about air quality having an impact on health.
- 4.15 Respondents felt the examples of business support offered by Nottingham City Council seemed reasonable and suggested the Council could also look at providing grants and discounts to support the uptake of sustainable and active travel by workers and offering advice and support on the management and implementation of the levy and on relevant planning issues.

Revenue Plan

- 4.16 The funds raised from a WPL must be ringfenced for delivery of the objectives of the local transport strategy. The survey and engagement period included questions on the areas that could be funded from a WPL if one was introduced. While further work is required to fully cost these options, the City Mobility Plan identified a list of public transport and improving connectivity of local streets, places and neighbourhood projects:
- 4.16.1 Enable further investment in the Edinburgh Tram network expansion (Granton to BioQuarter);
- 4.16.2 Bus improvement measures including electric charging infrastructure, bus lanes operating seven days a week, from 7.00am to 7.00pm, giving also significant protection for cyclists against other motorists;
- 4.16.3 Active travel corridors and public realm improvements along routes with heavy retail and business park presence, for example in the city centre and West Edinburgh areas; and

- 4.16.4 Review of major junctions in Edinburgh to improve the accessibility and road safety at around 40 junctions in the city.
- 4.17 The online survey also identified a list of direct support to businesses to encourage behaviour change to sustainable transport modes and include:
- 4.17.1 Access to season ticket loans for public transport;
 - 4.17.2 Cycle2Work / Bike2Work schemes;
 - 4.17.3 Better quality secure cycle storage at more locations;
 - 4.17.4 Advice to businesses on how to implement and manage fair employee parking schemes;
 - 4.17.5 Individual travel plan support to businesses, as mode of travel used for commuting is a personal choice influenced by a range of factors;
 - 4.17.6 Assistance with analysis of staff and student commuter travel patterns, and developing data driven Sustainable Travel Plans;
 - 4.17.7 More charging points for electric vehicles;
 - 4.17.8 Free shuttle bus from key transport hubs to workplaces; and
 - 4.17.9 Grants to implement workplace infrastructure that supports behaviour change, including bike storage, changing facilities, e-cargo bikes, free servicing for bikes or discounted repairs for staff.
- 4.18 From conversations with stakeholders there were further suggestions:
- 4.18.1 Concessionary fares or discounted public transport;
 - 4.18.2 Extend services for the tram or bus to better serve workplaces, including more orbital routes and longer operating hours (like a 24-hour service);
 - 4.18.3 Improve road conditions for vehicles and bikes including segregated cycle lanes;
 - 4.18.4 Replace diesel buses with electric buses; and
 - 4.18.5 Invest in consistent promotion and use of new technologies to promote car sharing opportunities.
- 4.19 Not all of the proposals listed in paragraphs 4.17 - 4.19 can be delivered from an Edinburgh WPL. The feasibility and cost of delivering these activities has not been determined in the report.

5. Next Steps

- 5.1 The findings from the initial engagement exercise can be used to inform the second phase of work should members wish to continue the consideration of the WPL. The

next phase of work will require additional resources to be in place. It is estimated that the financial value of this will be up to £100,000. The next stage is to:

- 5.1.1 Develop and outline the recommended Edinburgh WPL proposal;
 - 5.1.2 Identify spending programmes eligible for funding from an Edinburgh WPL;
 - 5.1.3 Refresh the 2020 Edinburgh workplace parking survey results; and
 - 5.1.4 Produce an environment and economic impact assessment on the Edinburgh WPL proposal.
- 5.2 The outline of a recommended Edinburgh WPL proposal will be further tested with engagement with business and will be subject to future impact assessment and public consultation, if approved at a later date by the Committee.

6. Financial impact

- 6.1 Pages 22-23 of the [report](#) to Committee on 2 March 2023 stated that the operational costs of the scheme to the Council could be approximately £500,000 per annum, and could raise between £10-12 million per year.
- 6.2 The Transport Act (Scotland) 2019 requires Local Government to reinvested funds raised from the WPL to support the delivery of the local transport strategy. These estimates are provisional and will be revised at the point of scheme design.
- 6.3 Should Committee agree to continue this work, the next steps will require investment of up to £100,000, to deliver the following:
- 6.3.1 Develop and outline the recommended Edinburgh WPL proposal (up to £20,000);
 - 6.3.2 Identify spending programmes eligible for funding from an Edinburgh WPL (delivered using internal resources);
 - 6.3.3 Refresh the 2020 Edinburgh workplace parking survey results (up to £30,000); and
 - 6.3.4 Produce an environment and economic impact assessment on the Edinburgh WPL proposal (up to £50,000).
- 6.4 The Council currently has no funding to progress the next steps of this work. Therefore, whilst the continuation of WPL is the decision of Transport and Environment Committee, approval will also be required from Finance and Resources Committee and the Council in June, to reprioritise up to £100,000 of existing reserves for this work. These reserves will need to be reinstated as part of the budget process.
- 6.5 Further work is underway to determine whether additional officer resource is required to create a dedicated virtual team to deliver the WPL which will sit between

strategy, transport and finance. Should there be a further resource requirement, this will also require approval of Finance and Resources Committee.

- 6.6 Alternatively, subject to the overall outturn for 2023/24, there may be an opportunity to consider allocating an element of any available uncommitted funds to the next phase of the WPL, taking account of other relevant risks. It is anticipated that the unaudited outturn will be reported to Councillors in June 2024, with any recommendations likewise subject to ratification by the Council.

7. Equality and Poverty Impact

- 7.1 A summary of findings from the interim Integrated Impact Assessment was included in the [report](#) to Committee on 14 September 2023. This will be updated as more information becomes available and decision making on the next steps become more certain.

8. Climate and Nature Emergency Implications

- 8.1 A summary of findings from the interim Integrated Impact Assessment was included in the [report](#) to Committee on 14 September 2023. This will be updated as more information becomes available and decision making on the next steps become more certain.

Environmental Impacts

- 8.2 A Strategic Environmental Assessment (SEA) has been completed for the City Mobility Plan to which this stage of the WPL was based on. It is considered that due to the WPL being in such an early stage of development, with no proposal developed, any consideration of a SEA being required is premature.

9. Risk, policy, compliance, governance and community impact

- 9.1 Further community impact and a high level risk register on the potential Edinburgh WPL will be prepared in a future report on the Edinburgh WPL proposal, if the Committee agrees to proceed to the next phase of consideration.

10. Background reading/external references

- 10.1 Transport and Environment Committee, [Edinburgh Workplace Parking Levy](#), 14 September 2023.
- 10.2 Transport and Environment Committee, [Strategic Business Case for an Edinburgh Workplace Parking Levy](#), 2 March 2023.
- 10.3 [Minute](#) of the Transport and Environment Committee meeting 2 March 2023.

10.4 Transport and Environment Committee, [City Mobility Plan](#), 19 February 2021.

11. Appendices

Appendix 1: Summary of WPL Engagement Survey.

Appendix 2: Summary of Findings from Businesses and Representative groups.

Appendix 3: Edinburgh WPL Timeline.

Appendix 1: Summary of WPL Engagement Survey

Response level and profile

The online survey received 2,621 responses. The majority of responses were from individuals. Out of the 2,621 individual responses 2,117 were from Edinburgh by supplying an Edinburgh postcode as the home address. Thirty-four respondents indicated that they were responding online on behalf of an organisation.

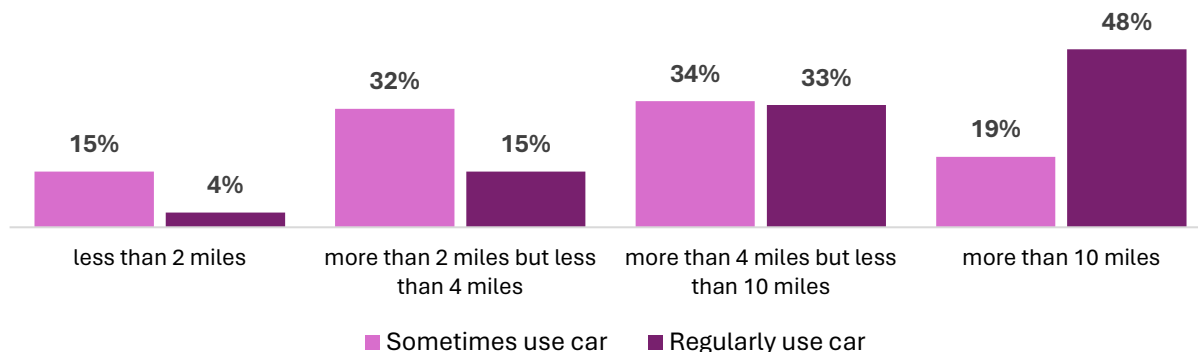
The majority of people replying to the survey (73% of respondents), currently use a private vehicle or car to commute to work at least sometimes (53% or 1,379 use their car to commute to work and 20% or 520 sometimes use their car to commute to work). From this group the average distance travelled varies by the frequency of car use, with more of those who regularly travel by car undertaking longer distances compared to those who sometimes travel by car to work or study.

4% of those who use their car regularly to work travel less than 2 miles. Compared to 15% of those who sometime use their car for that journey.

48% of those who use their car regularly to work travel more than 10 miles.

Compared to 19% of those who sometime use their car for that journey.¹

Figure 1: Average one way distance respondents to survey travel to work or study by car, regularly or sometimes (count 1,899 respondents out of 2,621)



Evidence from the [2019 Edinburgh Travel Behaviour study](#) showed that the journey to work or education is most likely to be made by bus (43%), car (30%) or on foot (20%). Travel behaviours may have changed since, but it would appear that the survey received a higher response rate from people who travel by car to work or study.

¹ In total 31% of respondents (count 802) reported travelling more than 10 miles one way between work and home. There were 489 respondents from Edinburgh that reported travelling more than 10 miles one way to work and home.

Around 49% of the respondent to the survey were between 35-54 years old. 47% of respondents work in the private sector; 41% work in the public sector; 5% in further or higher education; and 4% in the third sector.

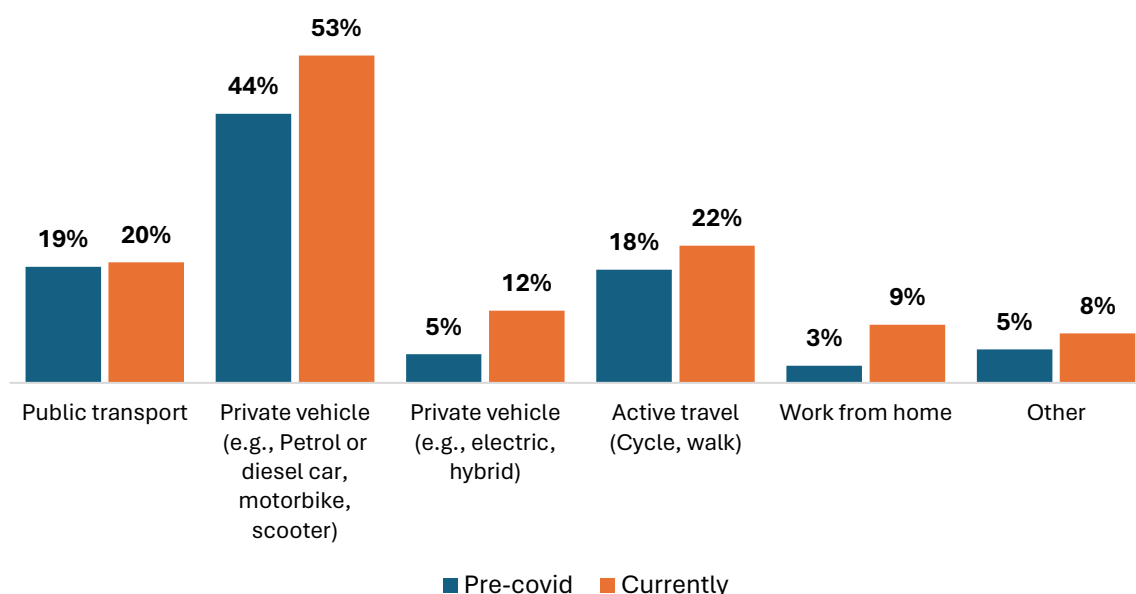
The response rate to the online survey therefore differs from the demographic profile for Edinburgh. Highlighting that the response rates was typically from those who use their car to travel to work, and from people that work in the public sector.

27% of the Edinburgh population are aged between 35-54 years old.²

26% of all persons employed in Edinburgh work in the public sector, and 74% work in the private sector.³

35% of employed adults (aged 16+) not working from home drive a car or van to work as their usual method of travel to work in 2022 in Edinburgh.⁴

Figure 2: How respondents usually travel to work (respondents could select more than one response)



Based on current use, 61% of public transport users were men, compared to 32% of women. 63% of those who use active travel were men, compared to 28% of women. 54% of vehicle users were between the ages 35-54 (54%).

50% of respondents would normally be expected in their workplace 5 days per week. Over the last 3 months, 42% of respondents had commuted, on average, 5 days per week. 33% had spent 2 or 3 days commuting per week.

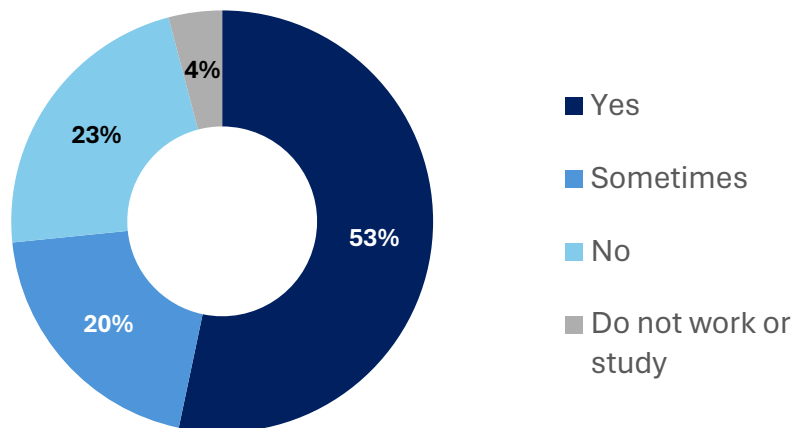
² Figures refer to population age breakdown for year period 2021 and represented the latest available data available [Data accessed from NOMIS on 28 March 2024].

³ Figures refer to annual population survey age breakdown for 12-month period to September 2023. [Data accessed from NOMIS on 28 March 2024].

⁴ Figures are from Transport Scotland – [Transport and Travel in Scotland 2022](#) - LA tables for 2022. [Data accessed from NOMIS on 28 March 2024]. The survey sample size for this question was 350.

Vehicle use

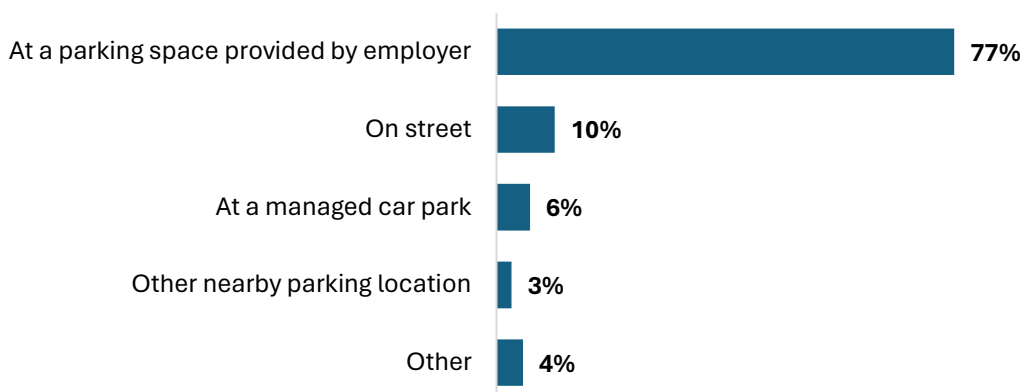
Figure 3: Private Vehicle or car used to commute to place of work or study



Overall, 73% of respondents use their own vehicle or car to travel to and from their place of work or study. More women use their vehicle than men (62% of women compared to 46% of men). 79% of respondents with caring responsibilities use their vehicle.

Out of all the respondents who use their vehicle, only 9% pay a fee or charge to park and the average cost for parking for that group is around £637 per year. 77% use a parking space provided by their employer.

Figure 4: Parking location



Other parking locations used by respondents included:

- community/customer car parks.
- on-street pay and display.
- rented or private spaces.
- underground parking.
- school car parks.
- nearby bike storage.

Some respondents noted that it varied depending on where they were working that day or whether they could get a space in their usual location.

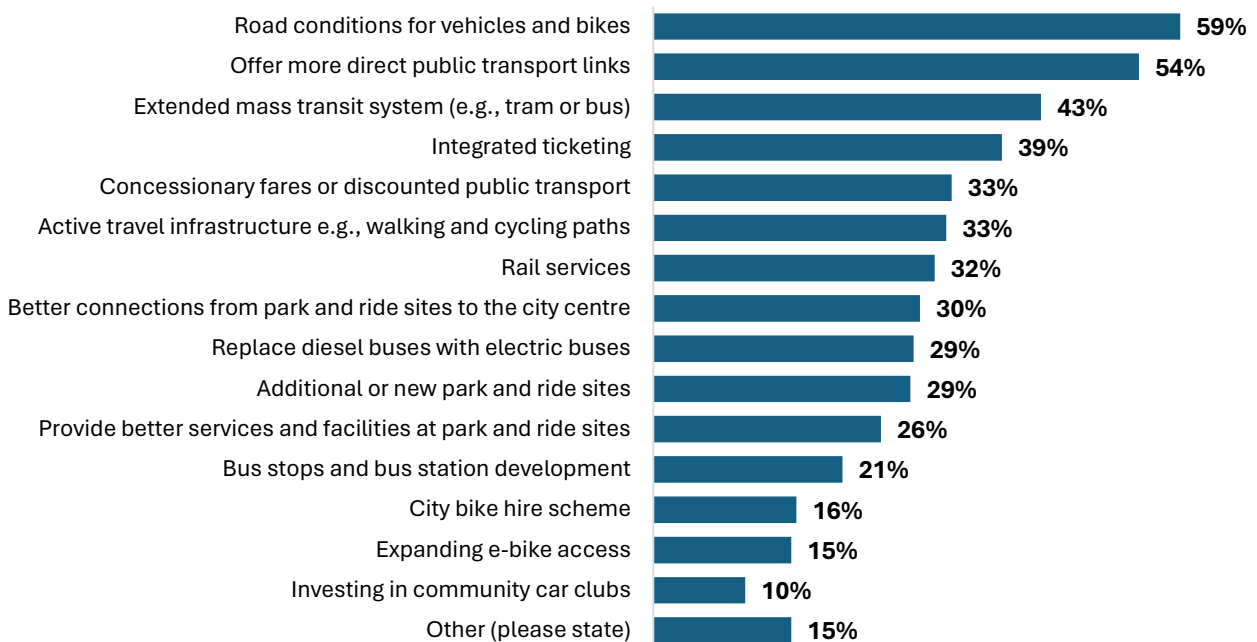
OPPORTUNITIES AND ISSUES FOR A WPL

Improving sustainable transport and active travel in the city

Respondents were asked their views on what Edinburgh needs to invest in to improve sustainable transport and active travel. 59% of respondents said that road conditions needed to be improved, with comments made about the number of potholes on roads and poor pavement conditions.

54% felt that more direct transport links were required. Many public transport routes require people to travel towards the city centre and then travel back out to their workplace. Respondents mentioned that more frequent public transport routes are needed for the outskirts of the city. Extending the availability of real-time bus trackers, integrated ticketing across all public transport options, simplifying fares and offering concessions were also suggested improvements.

Figure 5: What Edinburgh needs to invest in to improve the sustainable and active travel transport offer.



Respondents commented that journey time and distance influenced their decision on considering using public transport or active travel. For many, it would take too long, or it was too far to walk or bike to work. This was especially the case for those who had caring responsibilities and were juggling childcare arrangements as part of their commute.

More cycle paths and lanes, better availability of secure cycle storage in key locations and allowing bikes on buses were all suggested to help remove barriers to considering cycling as a mode of travel.

Safety was a highlighted concern, with issues raised about the safety of cyclists sharing roads with other vehicles, traveling in poor weather or during darker mornings and nights (especially for women and girls).

32% of respondents felt rail services could be improved. Suggestions included creating suburban train routes, providing additional services and more concessions or discounts for workers.

When asked what else Edinburgh needs to improve transport for people working in the city, public transport availability was highlighted. Respondents, especially those working unsocial hours or shift workers, said that bus services needed to be made available 24 hours a day. For some, the only choice they had to get to work on time or get home from work was using a private vehicle.

Respondents felt more recognition was needed for essential workers or individuals who had no other suitable options other than driving for work. In addition, numerous comments were made about the cost-of-living crisis and how the cost of public transport was prohibitive.

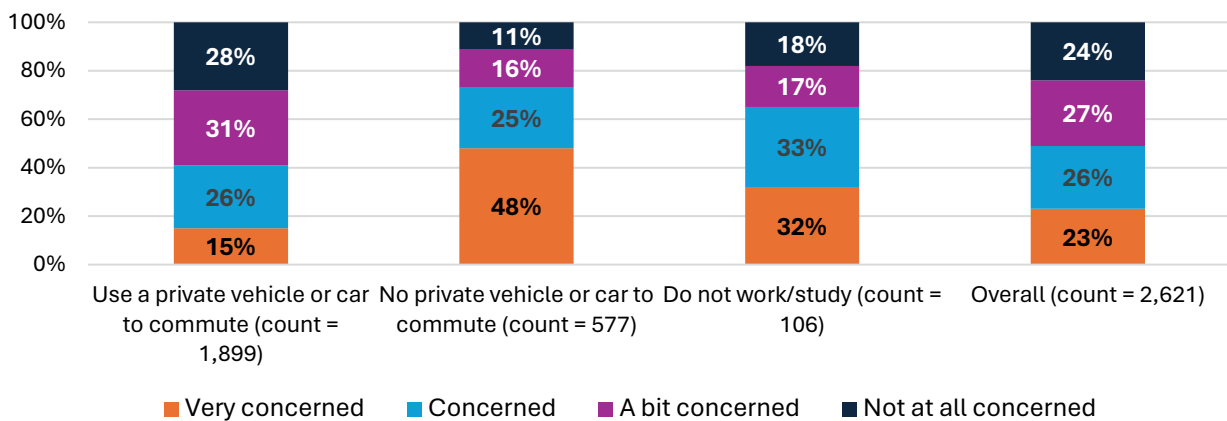
Better enforcement action is needed to tackle dangerous driving, blocking bus lanes, parking on double yellow lines, parking in cycle lanes etc.

The introduction of Spaces for People measures, LTNs etc were also highlighted to have had a negative impact on road/car users. It was felt that the narrowing of roads and road closures had impacted on congestion levels.

Congestion and air quality

In total 49% of all respondents said that they were either very concerned or concerned about congestion levels in the city. 24% of respondents said they were not at all concerned.

Figure 6: Concern about levels of congestion in the city * vehicle use for commute

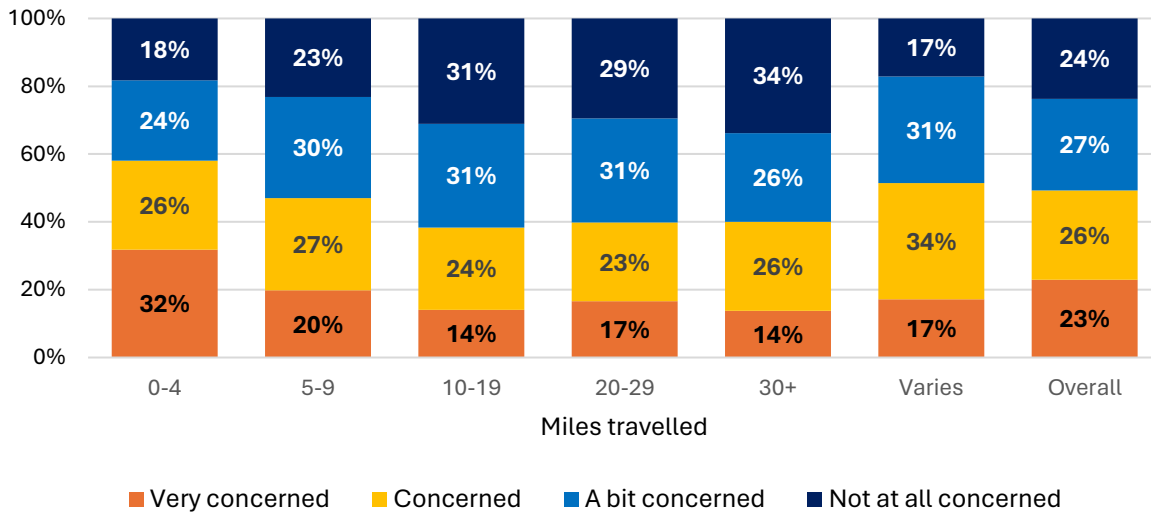


Concerns were higher amongst those who did not use a private vehicle or car to commute versus those who did. 48% of respondents not using a private vehicle or car were very concerned with levels of congestion, compared to 15% of those who used a private vehicle or car. There were 577 respondents not using a private vehicle of car to this survey, compared to 1,899 that use a private car or vehicle to commute.

Men were more likely to be very concerned compared to women (28% of male respondents compared to 18% of women).

Respondents travelling shorter distances were also more likely to report higher concerns about congestion than those travelling longer journeys.

Figure 7: Concern about levels of congestion in the city * miles travelled

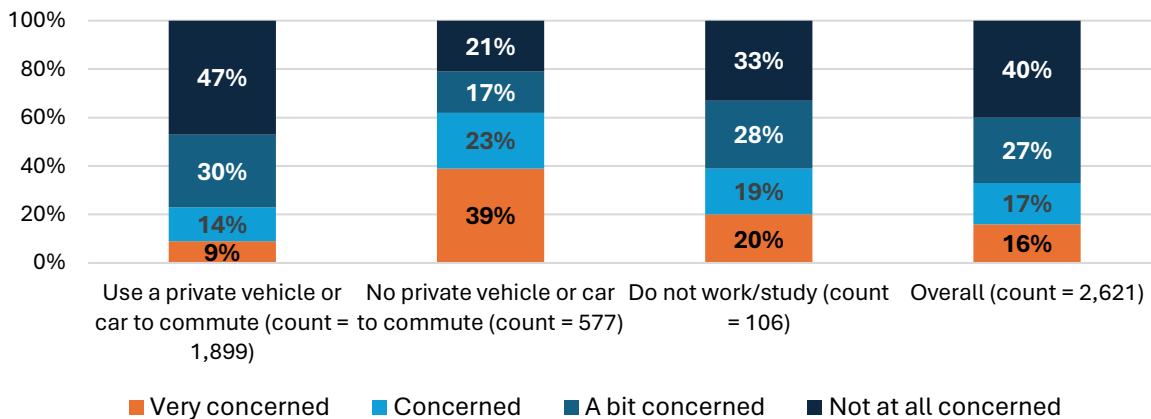


When asked to explain their concerns, respondents felt that there were too many roadworks and road closures/diversions happening throughout the city. It was suggested that the Council could liaise better with utility companies regarding major works to ensure disruption was kept to a minimum. There were complaints made about traffic management and the number of transport initiatives and schemes the Council is currently trying to adopt across the city. Some respondents felt that this was being mismanaged by the Council and that this was contributing to the levels of congestion in the city.

Public transport is perceived as too slow and unreliable due to multiple bus stops and navigating roadworks, closures etc. There is a sense that respondents feel time poor when it comes to balancing their commute with other responsibilities and that the efficiency of their mode of transport is important.

In contrast, those not concerned about levels of congestion felt that air quality was fine, levels of congestion are only during peak travel times and that it needs to be accepted as part of city living life.

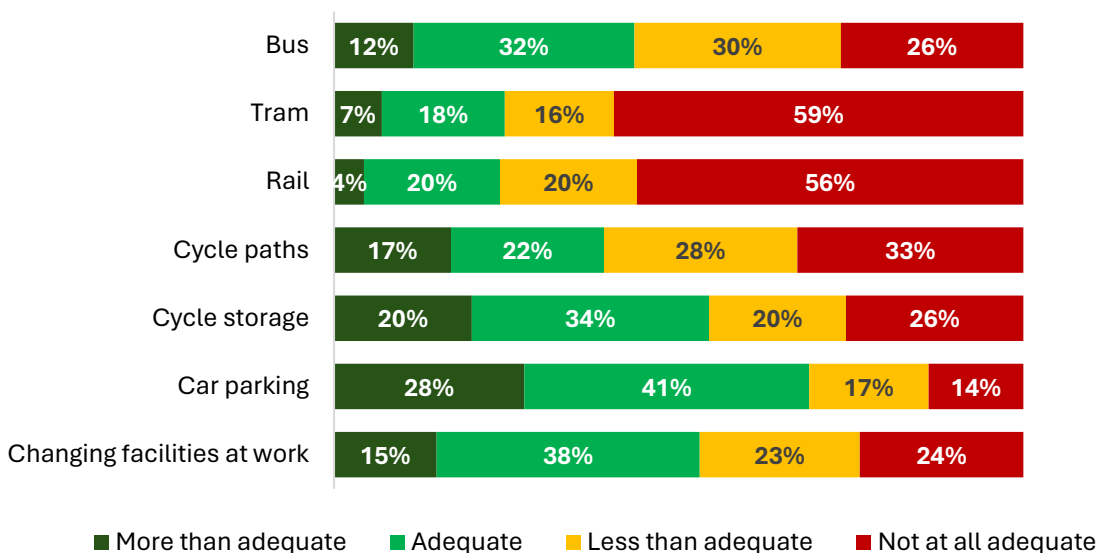
Figure 8: Concerns about air quality impacting on health



Overall, 40% of respondents were not at all concerned about air quality having an impact on health. When asked why they felt this way, respondents said that they didn't think Edinburgh had issues with air quality due to the greenspace available and weather conditions. They felt they hadn't been presented with sufficient data and evidence to prove it was an issue. In addition, with the rise of electric vehicle use any issues would reduce over time.

However, concern about air quality was higher in respondents who did not use a private vehicle or car to commute. Reasons for concerns included believing that high levels of congestion, poor traffic management and the introduction of unnecessary transport policies all contribute to increased pollution levels. Respondents also reported concerns about their health and that of their families. Some respondents emphasised that road traffic is the main source of air pollution in Edinburgh, and nationally.

Figure 9: Provision of transport options

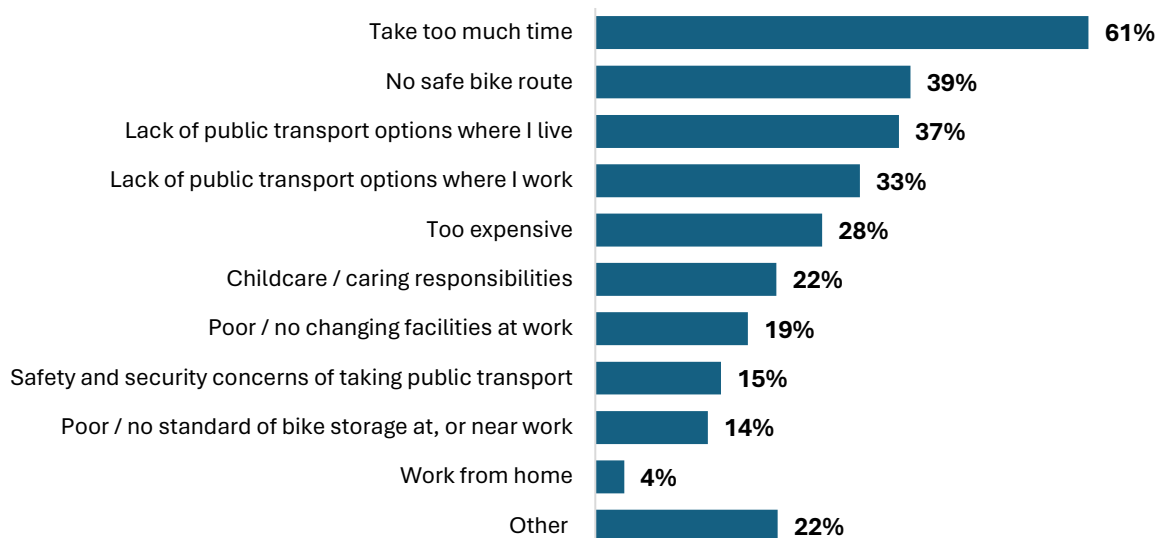


Provision of car parking where people work and study is more adequate than any other transport options, with 69% of respondents saying provision is adequate or more than adequate.

Barriers to using public transport or active travel.

The main barriers to respondents using public transport or active travel were that it would take too long (61%), a lack of safe cycle routes (39%), lack of public transport options near their home (37%) and at place of work (33%), the cost (28%) and having to balance childcare and/or other caring responsibilities (22%).

Figure 10: Barriers to using public transport or active travel.



Other barriers mentioned unprompted were:

- Poor weather conditions and Edinburgh's geography (too hilly)
- Road conditions
- Age and poor health / existing health conditions (respondents noted that these conditions may not qualify for a blue badge but still prevent them from alternative travel options)
- Poor bike storage where they live (e.g. lack of space, tenement flats, unsafe communal areas)
- Carrying equipment for work (e.g. tools, schoolwork and jotters, paperwork etc)
- Trip chaining (e.g. combining commute with food shopping, nursery/school runs, recreational activities, gym and sports classes)
- Shift work or working unsociable hours.

Support for businesses.

Respondents felt the examples of support offered by Nottingham seemed reasonable and suggested that we take advantage of the lessons learned by Nottingham in their WPL implementation.

The following types of support were suggested:

- Access to season ticket loans
- Cycle2Work / Bike2Work schemes
- Better quality secure cycle storage at more locations

- Advice on how to implement and manage fair employee parking schemes
- Individual travel plan support, as mode of travel used for commuting is a personal choice influenced by a range of factors)
- Assistance with analysis of staff and student commuter travel patterns, and developing data driven Sustainable Travel Plans.
- More charging points for electric vehicles
- Grants to implement infrastructure that supports behaviour change:
 - Converting parking spaces for alternative use e.g. secure bike storage.
 - Adapting existing buildings to include changing facilities.
 - Provision of Switching from using motor delivery vehicles to e-cargo bikes.
 - Free servicing for bikes / discounted repairs.
 - Provision of shuttle buses from key transport hubs to workplaces.

It was noted that the support required will depend on employers' needs. Examples were given where travel change measures had already been introduced or landlords are already providing support to attract business tenants. Partnering and engaging with Business Improvement Districts and employers is needed to identify what will help most.

Some organisations raised concerns about the potential level of administration required in applying a WPL becoming a burden – having to submit grant applications, manage car spaces, agree any level of charge passed onto employees etc.

It was suggested that if a WPL was introduced, this should be a phased introduction over a number of years (or trialled in various areas) to give businesses time to transition or reduce their parking supply and find alternatives.

Respondents suggested that support could be provided to businesses regarding planning process and applications if new facilities needed to be built or existing space adapted. Existing best practice scenarios could be shared, for example where organisations have successfully reduced the number of individual vehicle journeys over a notable period of time.

IEWS ON THE DESIGN OF AN EDINBURGH WPL

Charge levels

Respondents were asked their views on potential benchmarks for determining an appropriate annual charge level, if a WPL was to be introduced.

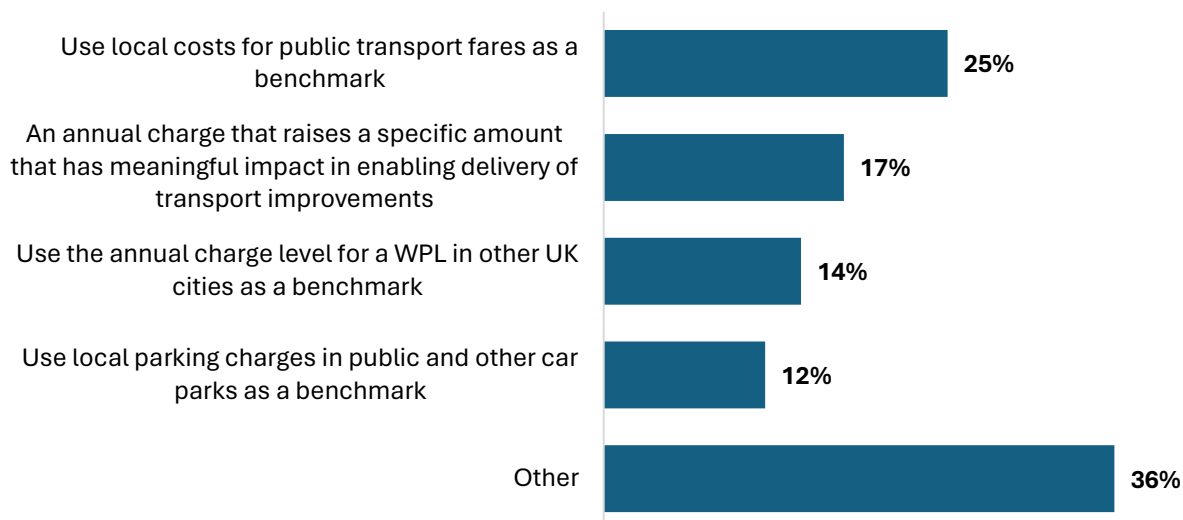
Many respondents felt there should be no WPL charge and stated they were opposed to the idea of introducing it. They felt an annual charge was unfair, discriminatory and unrealistic. They compared it to an extra tax on working people and commented on the impact of the cost-of-living crisis and overly expensive local parking charges in the city already. Others questioned why employers should be faced with a charge when many already lease parking spaces from their landlords.

Some respondents suggested that employers who unreasonably refuse the option to work from home to their employers should face a full levy, while employers who offer flexible working solutions should pay less. Others suggested that the charge should be based on employer size and revenue generated.

It was felt that charges would be passed onto employees. It was suggested, if this was the case, that costs would need to be minimal / manageable / affordable. Some suggested charges should be means-tested, salary based or based on vehicle type and emissions.

Some respondents felt they weren't qualified to comment on appropriate benchmarks and that this needed expert analysis and consideration. Some questioned how a meaningful impact in enabling transport improvements would be quantified.

Figure 11: Benchmarks to determine an appropriate annual charge level

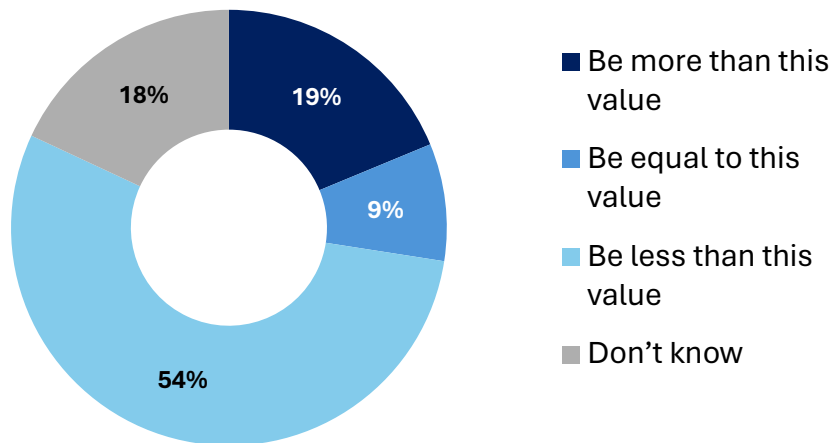


25% of respondents thought using local costs for public transport fares would be appropriate. However, views were mixed on how this would be used. 19% of respondents felt that the WPL charges should be higher than public transport fares to deter car use and influence behaviour change.

It was felt that £650 was already too expensive and respondents pointed out that an annual bus pass also covers personal travel. In response to the question on benchmarking the annual cost against the cost of public transport fares, 54% of respondents thought any charge applied should be less than public transport fares. The position for the costs varies by respondent profile:

- 67% of respondents who take their private vehicle or car to work regularly believe it should be less than public transport fares.
- 50% of respondents who take their private vehicle or car to work sometimes believe it should be less than public transport fares.
- 21% of respondents who do not take their private vehicle or car to work regularly believe it should be less than public transport fares.
- 32% of respondents from business groups believe it should be less than public transport fares.
- 26% of respondents from those that do not work or study believe it should be less than public transport fares.

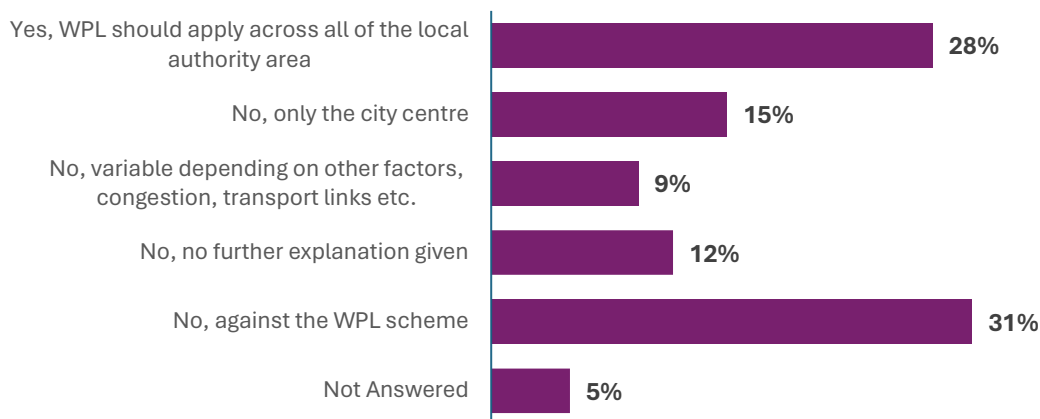
Figure 12: Benchmark annual charge levels against the cost of public transport fares



WPL Boundary

Almost 30% of all respondents agreed that a WPL should apply across the whole of the local authority area, with 70% of respondents disagreeing. However, out of those that did not agree that a WPL should apply to the local authority boundary further analysis of their reasons was carried out and is provided in Figure 13. Some suggested the WPL boundary should be similar to the city centre’s LEZ (15%) or that the boundary should only apply to areas that have congestion issues or where transport links were already very well served (9%), around 12% of respondent said no to the whole of the local authority area but did not provide a reason. It was noted that 31% of respondents expressed a view against the WPL.

Figure 13: reasons given for saying NO to the question that a WPL in Edinburgh should apply across the local authority boundary.



Impact of introducing a WPL

Respondents were asked to comment on what they thought the positive and negative impacts of a WPL may be if it was introduced.

Positive impacts

Overall, respondents would expect to see a reduction in car use, levels of congestion, reduced road traffic emissions and improved air quality. Streets would become safer, due to less vehicles on them, and become more attractive for people to consider cycling. This would improve health outcomes for the city and improve people's quality of life.

Some respondents stressed that a climate emergency has been declared and that the reduction in car use and workplace parking should not be optional. Some argued that a strong incentives was needed to ensure action and that these would come from the transport investment funded from the WPL.

A WPL would provide the Council more money to invest in roads, cycling infrastructure, and explore more sustainable, greener transport. Respondents provided examples of other cities (e.g. Paris, Brussels, Berlin, Barcelona, Copenhagen, Amsterdam) where well connected, segregated cycling infrastructure has been developed and is used.

Investing in more reliable and well-connected services is needed to shift travel behaviours and allow people to go about their business quickly and conveniently.

Negative impacts

The majority of respondents mentioned the financial impact of introducing a WPL as a potential negative. Some felt that it was inevitable that costs would be passed to employees by employers, and that this would compound the issues already experienced due to the cost-of-living crisis.

The cost of housing in the city is too expensive, with some respondents mentioning they live outwith or on the outskirts of the city due to affordability. If costs were to be passed on, some respondents expressed concerns that they would be penalised for not being able to afford living in the city, and would have to look for work elsewhere and would be pushed into financial difficulty.

Other respondents felt that the introduction of a WPL would negatively impact particular groups and that this would be discriminatory. It could have negative consequences for people with poor transport links where they live or work, those with caring responsibilities (especially women) or mobility issues (especially those that do not qualify for a blue badge). This would negatively impact on their wellbeing and their work-life balance.

Respondents felt that introducing a WPL would encourage displaced parking in neighbourhoods. It could lead to people choosing to work from home more, leading to less footfall in the city and shops and impacting on the city's economy.

Some respondents suggested that the cost and administration of the levy could be burdensome for businesses, especially smaller ones. The levy could add to the fiscal pressure on businesses and could result in businesses looking elsewhere for office space,

leaving the city at the risk of economic decline. It could even contribute to employers going out of business.

If charges were passed to staff, staff affected may decide to seek employment elsewhere or leave their job. There may be issues in attracting new talent or retaining existing staff with specialist skills within the workforce.

Workplace parking levy discounts or exemptions

When asked what exemptions and discounts people would like to see if a WPL was introduced in Edinburgh, some respondents highlighted that they did not think a WPL should be introduced. Some felt that it amounted to an additional tax on people who work and that it was unfair / discriminatory.

Some respondents felt that consideration of the proximity to quality, consistent public transport and active travel routes is needed, with exemptions applied where necessary.

Other respondents felt that the exemptions referred to in the consultation seemed fair.⁵ A few respondents felt that exemptions and discounts should be kept to a minimum, as the more introduced made the scheme more vulnerable to deception or the risk of appearing unfair.

Other comments related to the types of vehicles or users using the spaces, rather than the space itself. Suggestions for further exemptions and discounts included:

- Employers based outwith the city centre.
- Schools and other learning institutions.
- Prisons.
- Third Sector.
- Essential workers.
- Workers who have no alternative for travel.
- Workers doing unsociable hours / shift work.
- People on lower incomes.
- People with caring responsibilities.
- Electric/hybrid vehicles.

⁵ The Exemptions referred in the survey questions were the National Exemptions in Scotland that are: Parking places reserved for Blue Badge holders, for healthcare workers at NHS premises, and parking places at hospices. The survey question also referred to the discounts that applied in Nottingham as an illustration which included employers and any associated employers, who between them provide 10 or fewer workplace parking places in total at all of their premises, Front line emergency services such as Ambulance, Police, Fire and the National Crime Agency, and Qualifying NHS premises.

Appendix 2: Summary of findings from Businesses and Groups

Summary of views on a WPL

This section highlights the key themes from employee representative groups, business representative groups, employers and representatives supporting sustainable travel. These views were collected from individual meetings and written responses provided to officers during the engagement period.

- Financial

Discussions on the opportunities of a WPL focused on how it provides a new income stream for transport investment. All of the groups wanted to see better investment in active travel and public transport systems. Some employers however felt that the expected revenue of £10-£12 million per year would not be enough to achieve the changes required.

Some employee groups told us that they already manage their car parking for staff very effectively. In some cases, therefore, the introduction of a WPL may displace funding already held in place by organisations and spent on active travel and public transport support.

- Congestion and climate emissions

Some employers and businesses groups provided additional references to studies on air pollution.⁶ Others highlighted data from the Department for Transport, SEPA and TomTom confirming that private car use has returned to close to pre-pandemic levels, with morning/evening peaks evident again since their initial flattening, indicating that congestion, continues to be a significant challenge.⁷

Some employers informed us that organisations have a duty of care to their staff and local communities to reduce local air pollution caused by their operations including staff commuting. Adding that many large organisations in the city are signed up to the Edinburgh Climate COMPACT, UN Sustainable Development Goals, and subject to the Scottish Government's Public Bodies Climate Change Duties.

Representatives supporting sustainable travel reported that existing measures to reduce emissions from transport are not sufficient and a WPL is necessary to reduce car use to meet climate targets. Employee representative groups highlighted that lot of good work on promoting sustainable travel options already exists and is well established, especially in

⁶ Air pollution causes one in 29 deaths in Edinburgh, with a higher proportion of people dying from air pollution in Edinburgh than in any other city in Scotland. ([Scotsman.com](https://www.scotsman.com/news/health/air-pollution-causes-one-in-29-deaths-in-edinburgh-1-6419428))

⁷ City Mobility Plan 1st Review, Transport and Environment Committee, City of Edinburgh Council, February 2024.

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schools who are already committed to reduce levels of congestion by sharing lifts and travel to work plans. Employers also believed that the effectiveness of the WPL could be minimal because some employers have already taken substantial steps already to influence employee travel behaviour.

- **Parking**

Business representatives and employee groups told us that WPL may create increased displaced parking. This is when workers seek to avoid paying the charge moving to other areas nearby or close to public transport terminals affecting neighbouring residential areas.⁸ It was noted from employers that the location of the displaced parking is most likely going to be in industrial estates or where there was an employment site in a residential area.

Representatives supporting sustainable travel informed us that the identification hot spots are necessary to baseline the current state of displaced parking. Further adding that this should be considered a first step before parking enforcements or new lane marking is considered to manage the issue. Further mitigation actions discussed included adding to the supply new Park & Ride places close to bus or tram stops and introducing Traffic Management interventions, or developing a displaced parking strategy or using funds from a WPL to support extra parking enforcement in residential areas.

- **Accessibility to workplaces**

Employers and employee representatives explained that there was inadequate public transport service to and from some work sites, this included also the lack of direct routes. Spatial analysis data shared during the engagement confirmed that among the top 40 largest workplace sites in Edinburgh, 25 of these are within a five-minute walk from at least five different bus routes, while there are three workplaces that are within a five-minute walk from only one bus route and five workplaces that have no bus routes within a five minute walk.

Employee representatives and employers informed us that some jobs require an early start where no transport options other than a car are available. For school workplaces the car represents the better option due to safety concerns. It was also reported that the workforce in the school sector are more likely to have additional caring responsibilities and therefore need to move quickly around the city for family emergencies or make multiple journeys in one day.

- **Health benefits**

Representatives supporting sustainable travel told us that travelling to work sustainability may result in better workforce wellbeing. For example, the health benefit to cycling or being more active and social needs to be included into the calculation of the benefits to workers. Some employers also recognised that there are also a preventative impact of

⁸ This was highlighted in the responses to the Edinburgh WPL Engagement survey, which found that 10% of those that take their car to work park on street rather than at their workplace provided parking.

increased activity and cost savings that apply to the NHS treatments for heart and lung disease, dementia and other health conditions.

- **Business impacts**

In summary, the some of the specific concerns on business impacts were raised by business and employee groups on the lack of public transport services available for jobs with an early start, the risk that part time workers may face full annual charge, and risks over recruitment and retention. It was highlighted that the income raising opportunity of a WPL may create jobs and see investment in public transport, or incentivising the ownership of electric bikes via grants giving workers more positive choices.

Business representative groups, employers, and employee representative groups told us that the introduction of a WPL could negatively impact on recruitment and retention of some staff due to safety concerns from using public transport if their car parking spaces was taken away or they were financially discouraged. Employee representatives informed us that if a WPL was introduced in Edinburgh, there should be efforts made to ensure a fair distribution to staff such as a centralised parking management plan to account for different work locations, access and other factors.

Some employee representative groups explained that a WPL is a concern for low paid staff and if the cost is passed on to employees this could push a number of workers further into poverty.

Some employers made the case that parking provision for their staff is vital part of their business model and that anything that makes the company less competitive and will have to be passed to customers in the form of higher prices, or create a risk of them losing business to competitors, which may result in them relocating out of Edinburgh with the subsequent loss of jobs and economic activity.

Representatives supporting sustainable travel argued that the provision of parking spaces already costs businesses in terms of estates and facility costs, and that a WPL may encourage better management of the car parking spaces as an asset.

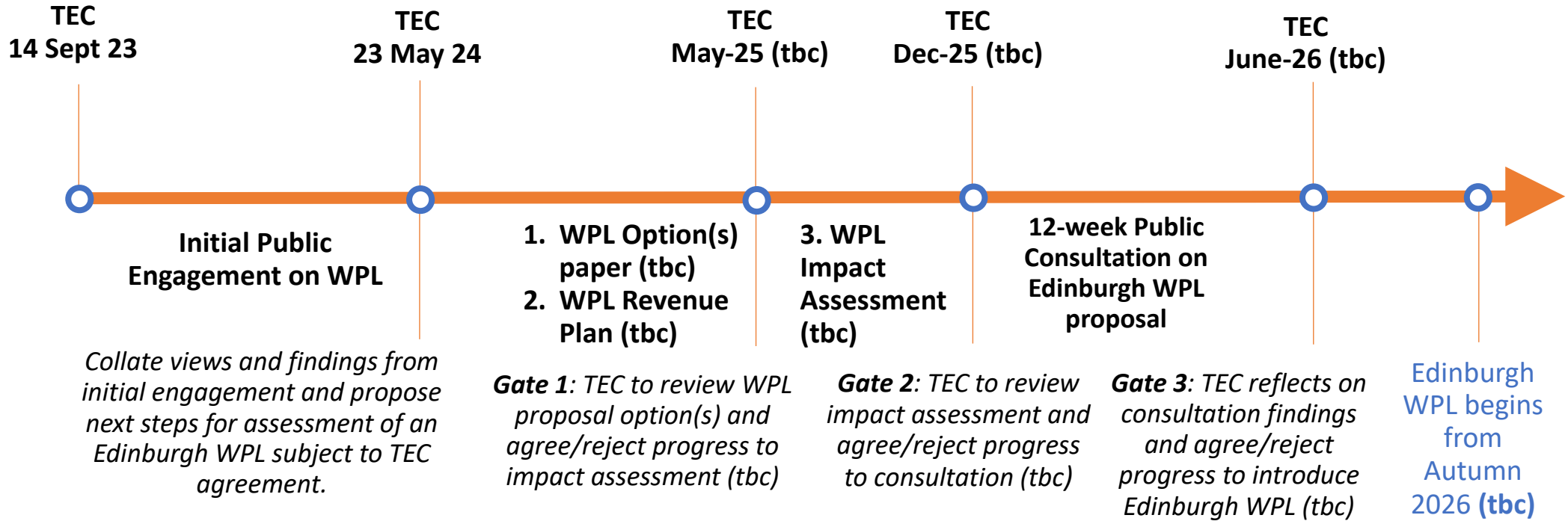
- **Uncertainty over the WPL scope**

Some business respondents also felt that there was little detail available on how such a scheme would operate in practice and there was evidence of some misunderstanding in responses on the circumstances that could be liable for a charge. Some stakeholders incorrectly assumed that the following types of parking would be liable for a charge:

- customer parking or guest parking for hotels
- all parking spaces on site
- pick up and drop off parking.

Some employers and employee representative groups explained that there was a lack of understanding on the specific points of a WPL. This included the improvements to be funded by it, the annual charge amount and whether the employee or employer will pay the full amount. This overall impact this has is that it is significantly challenging at this stage to evaluate articulately.

Appendix 3: Edinburgh WPL timeline



First WPL Engagement phase and reporting findings - Sept 2023 to May 2024

Development of WPL options for assessment (12 months)

Impact Assessment of WPL option(s) (6-8 months tbc)

Statutory Consultation on Edinburgh WPL (from Early 2026 tbc)

Implementation period (3-months)