



Universities Scotland submission to Rural Economy and Connectivity Committee inquiry into Workplace Parking Levy

May 2019

Universities Scotland represents the Principals and Directors of Scotland's 19 higher education institutions. We do so by working with a wide range of professional networks across the higher education sector.

We welcome the chance to respond to this amendment to the Transport (Scotland) Bill. We have made a brief response in discussion with the Scottish Association of University Directors of Estates (SAUDE). However, we have been limited as to how extensively we, and SAUDE, have been able to engage across the sector given the tight timescale for consultation. This response has been informed by the views of only a few of our members, and may not fully capture all points that every individual institution may wish to make to reflect their unique context in regards to size, geography or mission.

We have attached two responses from individual institutions as annexes to our submission. It may be that they have also submitted these views directly to the Committee.

It is important to contextualise our comments by saying that the Scottish higher education sector takes the threat of climate change seriously. We recognise our responsibilities as organisations in this regard and are taking significant steps to mitigate the impact of our operations, in addition to the significant research role that universities have in helping to progress our understanding of climate change and to develop alternative technologies to help address it. We support the goal to reduce emissions, improve air quality and reduce congestion. The individual submissions made by universities provide more detail of their environmental strategies and the impact they are having.

As context:

- The Higher Education Statistics Agency records that there are over 16,500 car parking spaces available across the 17 higher education institutions in Scotland for which data is recorded. This is relative to a total higher education staff workforce of over 48,000. It reflects the multiple and diverse range of locations in



which universities are based around Scotland, and in proximity to city centres. It also reflects the diversity of the higher education workforce, where some staff roles are involved in supporting the 24 hour operation of campuses and sites, every day of the year (particularly the case for sites where research is taking place). (Data for 2017/18).

- Additionally, the same institutions offer almost 13,500 recorded cycle spaces, as recorded by HESA. Five institutions offer more cycle spaces than car parking spaces. (Data for 2017/18).

We have a few broad points to make in response to the consultation:

- The proposed Levy is likely to bring significant cost implications for universities as employers, though it is very difficult for us to make a sector-wide estimate of the cost of this given the scope for discretion in its implementation by local authorities. At the moment, we're only aware of two local authorities which have indicated they intend to apply the Levy. The Levy also provides for a number of possible exemptions and allows discretion as to whether the cost is met by employers or employees. We do not yet have a full sense of how this would be implemented in the sector. Universities are already facing a mounting number of increasing cost pressures, at the same time as real terms reductions in their public funding.
- If the Levy were to be adopted by local authorities across Scotland it is likely to have disproportionately adverse impact on universities and/or certain campuses which are based in more remote and rural areas, where public transport options are more limited making travel to work by car a more viable option. Such institutions play a key role in their region, as employers and more broadly, precisely because of their location, and it would be unfortunate if they were to be penalised as a result and in the face of limited alternatives.
- If implemented, it is important that the Levy mechanism is also accompanied by measures to improve infrastructure and support a modal shift in Scotland towards more sustainable and active travel options, including public transport, cycling and walking.



Annex A: University of Glasgow response

We understand that the Workplace Parking Levy is one of a raft of measures being brought forward by the Scottish Government in order to tackle the complex issues to achieve Scotland's wider climate change agenda and to support actions to address the climate emergency. However, while the University of Glasgow recently joined the growing number of organisations which have declared a climate emergency, we would have concerns about the introduction of a levy on parking spaces. Rather, we would support measures that see the Government provide greater investment in infrastructure and encourage use of public transport and improve participation with regard to active travel.

In relation to parking and travel by car the University of Glasgow has already set ambitious targets to encourage modal shift towards using more sustainable forms of travel through its [Strategic Travel and Transport Plan](#) and [Sustainability Strategy](#).

These strategy's recognise the environmental and societal impact of travel by private car and recognises the efforts that must be taken to ensure the wellbeing of our communities and people. We have set specific targets aimed to reduce lone driver car journeys and reduce business travel by car. It is however acknowledged that more could be done to tackle this issue at a more strategic city-wide and national level.

A core aspect of working to achieve our sustainability targets required a comprehensive review and replacement of our long standing approach to providing parking permits. It is worth pointing out that only a small percentage of people who work or study at the University are allowed to park (only 1.4% of those who work or study on the Gilmorehill campus). The University of Glasgow used to provide access to parking permits on a first come first served basis with no assessment on eligibility or measurement of need for a permit. This resulted in a system which arguably allowed staff living within easy commuting distance to default to travelling by car as there were no disincentives to not come by car and few incentives to travel by other means. The University has since implemented a new criteria based Vehicle Management and Enforcement Scheme in 2019 in order to modernise our approach to parking and in order to have a more agile scheme which can be readily adapted. The University will now invite applications for parking permits on an annual basis and criteria will be set by which applications are scored. Currently our criteria looks to identify those members of staff or students who have the greatest need to travel by car by considering factors including disability, having relevant caring responsibilities, business needs and availability of alternative forms of travel. This means we have taken steps to only allow those with an identifiable need to park on campus and it is worth noting these people often have limited ability to travel by other means.



Related to this the University of Glasgow has ambitions to grow and in order to accommodate this growth we are embarking on a major campus development programme through the creation of a new urban quarter adjacent to the main campus in Glasgow's west end. The masterplan and vision for the new campus development focuses on the creation of inspiring places designed for people first and foremost with a strategic decision being taken to provide no new parking, other than accessible parking, as part of new campus being delivered. We are instead investing heavily in the creation of pedestrianised routes connecting the campus to the wider city, provision of significant levels of new cycling infrastructure and initiatives (high volumes of cycle parking, showers, lockers, training, rentable e-bikes, bike hire etc) and the promotion of public transport. We believe that this shift will deliver a campus which is truly transformational and to the benefit of society as a whole.



Annex B: University of Edinburgh response

The University of Edinburgh has 41,500 students and 14,500 academic and support staff working and studying across five main campuses. With our sites dispersed across the city and into Midlothian, we collectively place significant demands upon the City of Edinburgh and south east Scotland's transport infrastructure. We recognise that these travel demands contribute to carbon emissions, traffic congestion, air and noise pollution.

The University has had a sustainable travel policy in place since 2000 which is supported by the delivery of behaviour change initiatives that have reduced reliance on private vehicles and increased walking, cycling and public transport use. Our current Integrated Transport Plan 2017-21 sets clear targets for sustainable and active travel, and for the uptake of electric vehicles:

<https://www.ed.ac.uk/files/atoms/files/integratedtransportplan.pdf>

Since 2000 the proportion of staff travelling by private vehicle has reduced from 42% to 23%. We continue to work towards ambitious targets in support of the University's Zero by 2040 Climate Strategy. This lays out a comprehensive whole institution approach to climate change mitigation and adaptation in order to achieve the ambitious target to become a net zero carbon university by 2040:

<https://www.ed.ac.uk/about/sustainability/what-we-do/climate-change/initiatives/zero-by-2040>.

The quality and provision of transport infrastructure directly impacts on the ability of the University to continue to encourage students and staff to use sustainable and active modes of transport. Feedback from our biannual travel survey is clear that our students and staff need:

- Increased capacity and frequency on bus and train services
- Affordable and attractive integrated ticketing
- High quality, accessible walking routes and pedestrian friendly streetscapes
- Safer, preferably segregated, cycling routes

We are supporting Scottish Government targets to increase the use of electric vehicles by:

- Since April 2017, all University internal mail has been delivered by our Servitors using three electric vehicles across the four main University sites.
- In 2018, the Estates Department replaced 10 operational vehicles used by the Maintenance Teams with like for like electric alternatives, meaning 30% of the Estates fleet now have zero emissions. This has a significant impact on University



emissions as the Estates Department currently runs a third of the University's total fleet.

- Some vehicles have been funded via the City of Edinburgh Council 'Switched on Fleets' programme.
- To meet the growing demand for electric vehicles we have installed electric charging points at various locations. We currently have 39 points at various locations across the City Areas and a hub of 10 at the King's Buildings. Funding has been secured from Energy Savings Trust and plans are in place for third and fourth phase installations at the BioQuarter and Easter Bush sites. Installation is due to commence in June 2019.
- All of our charge points are available for members of public to use as well as University branded vehicles. The ChargePlace Scotland website provides information on charge points across Scotland, their availability and charging speed (Standard, Fast and Rapid).
- In 2019 we will continue to apply for funding for the University to provide more charge points and increase the fleet of electric vehicles. We will also continue working with colleagues to promote the environmental and monetary benefits of switching to zero emission vehicles.

Car Parking Management

The University of Edinburgh has 2490 parking spaces split across the four University sites. In support of the University's Integrated Transport Plan, a criteria based application system is in place to prioritise the allocation of permits to those staff and students who have proven they have little or no other option but to drive a vehicle to the University, rather than using other means of travel.

Applicants are required to answer a series of questions to ascertain their need for a permit. The agreed criteria contain six principles. They are:

1. Mobility
2. Essential business use / Unsocial hours
3. Equality and diversity
4. Lack of suitable alternatives to the car
5. Distance travelled from home to work / study
6. Membership of Tripshare

The cost to purchase a permit varies across the University campuses. Revenue from parking permits covers the cost of the management and administration costs of the parking management system, and maintenance of car parks.

The introduction of the Workplace Parking Levy will have a significant financial impact on the University and its staff and student permit holders (stakeholders). The costs,



based on the figure of £415 per parking space as applied by Nottingham Council, and the implications this will have are set out for each site below.

City Centre Area

Number of parking spaces available: 551

Total WPL cost to the University for the site: £228,665

The King's Buildings

Number of parking spaces available: 558

Total WPL cost to the University for the site: £231,570

The King's Buildings is situated on the periphery of the city where there are no parking restrictions currently enforced by Edinburgh Council and anyone may park in the surrounding residential streets.

The current annual charge for parking is nominal at £93.00 (£0.42 per day, based on a standard 220 working day year). Not all stakeholders currently choose to pay this amount and purchase a permit, rather they will park in the surrounding streets. This places significant strains on the University's relationship with its neighbours currently. The assumption is, should a WPL applied in this area, stakeholders would choose not to purchase a parking permit and the surrounding streets would be used for parking, creating congestion and further negative impact on relations with neighbours.

BioQuarter – Little France

Number of parking spaces available: 505

Total WPL cost to the University for the site: £209,575

The University have 14% allocation (280 permits) within the Royal Infirmary car park to allocate to stakeholders annually. We also have a further 225 within University owned car parks on the site.

The site is relatively accessible via public transport from most directions, however, as with the city area, there are stakeholders who have little or no other option but to drive a private vehicle to the site.

Easter Bush



Number of parking spaces available: 877

Total WPL cost to the University for the site: £363,955

The Easter Bush site, where the University of Edinburgh's Vet School is located is a rural site in Roslin, Midlothian.

The site is remote and currently very inaccessible via any other means than private vehicle.

All stakeholders who make a request are issued with a parking permit at no cost for this site currently.

Total cost to the University of Edinburgh, should the WPL be introduced across all four sites: **£1,033,765**

