



**UNISON Scotland response:**  
Workplace Parking Licensing - Consultation on  
Regulations and Guidance

**September 2021**

## **Introduction**

UNISON is Scotland's largest trade union with members across the public, private and voluntary sectors. We welcome the opportunity to respond to this Transport Scotland consultation.<sup>1</sup> Our response is an overall response, rather than to specific questions.

## **Overview**

For many years, UNISON Scotland has, working with Stop Climate Chaos Scotland and others, called for a range of urgent policy actions to tackle climate change. The August 2021 United Nations Intergovernmental Panel on Climate Change 'Code Red for Humanity' report<sup>2</sup> emphasises that time is running out and the climate emergency requires fast and fundamental change at many levels. As UN Secretary General Antonio Guterres said in his 'code red' warning, the only way to prevent exceeding global heating of 1.5C is to urgently step up efforts, and to pursue "the most ambitious path".

It is in that context that we repeat the point we made in 2019<sup>3</sup> on Workplace Parking Levy (WPL) amendments to the Transport (Scotland) Bill. It is said that a WPL will help reduce car use. However, the most important and effective way to do that is to invest in an integrated sustainable public transport system. This requires massively increased public ownership.

We have long called for the railways to be re-nationalised and buses re-regulated. A key July 2021 report Public Transport, Private Profit<sup>4</sup> by Philip Alston, former UN Special Rapporteur on extreme poverty and human rights, makes clear that we need public control and ownership, including on human rights grounds and to tackle transport poverty. The report states: "Voluntary partnerships between bus companies and local transport authorities are a failed middle ground that should be phased out in favour of public control and ownership."

We also urgently want to see free public transport pilot schemes introduced in Scotland (as called for by the Just Transition Commission earlier this year<sup>5</sup> and called for by UNISON and by groups such as the Glasgow Free Our City campaign<sup>6</sup>). People will increasingly feel able to choose public transport, or active travel by walking and cycling, when it is convenient,

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<sup>1</sup> <https://www.transport.gov.scot/consultation/workplace-parking-licensing-consultation-on-regulations-and-guidance/>

<sup>2</sup> <https://www.un.org/press/en/2021/sgsm20847.doc.htm>

<sup>3</sup> <https://unison-scotland.org/wp/wp-content/uploads/UNISON-WPL-21-May-For-Web.pdf>

<sup>4</sup> [https://chrgj.org/wp-content/uploads/2021/07/Report-Public-Transport-Private-Profit.pdf?fbclid=IwAR3Zo2-AwPQul-S\\_6tZMqLm7-kYFwLRbFtzfnb-yAsQimzXn3nDADuWMY\\_4](https://chrgj.org/wp-content/uploads/2021/07/Report-Public-Transport-Private-Profit.pdf?fbclid=IwAR3Zo2-AwPQul-S_6tZMqLm7-kYFwLRbFtzfnb-yAsQimzXn3nDADuWMY_4)

<sup>5</sup> <https://www.gov.scot/publications/transition-commission-national-mission-fairer-greener-scotland/pages/5/>

<sup>6</sup> <https://www.getglasgowmoving.org/reports/FreeOurCity.pdf>

[https://www.getglasgowmoving.org/reports/FreeOurCity\\_report.pdf](https://www.getglasgowmoving.org/reports/FreeOurCity_report.pdf)

affordable, safe, accessible to all and meets the transport needs of all our communities. Due to the COVID pandemic, there is now also a particular need to ensure the public can have confidence in public transport being safe. Tackling this must be an urgent priority for all in transport, as part of just and green recovery planning.

In 2019 we emphasised the case we have made for years – that if workplace parking levies are to be considered, this must be as part of fair green travel to work plans, negotiated with the recognised trade unions. These plans and any WPL scheme must take account of access to public transport, cost, shift work and essential car user posts. It is also worth noting that those on lower incomes, including many low-paid women working in public services, while hit disproportionately by very expensive bus services, are less likely to be able to afford to use cars or to have cars provided by their employer. Travel to work plans should look thoroughly at all these issues and ensure that any WPL charges are linked to ability to pay.

While there is clearly a potential benefit for all in reducing car use in terms of reduced congestion, reduced air pollution and other quality of life benefits, including health benefits from cleaner air, introducing a WPL must only ever be done in the fairest and most transparent way possible. We had concerns about the specific proposal under discussion and opposed the amendment<sup>7</sup>. We noted that an exemption for NHS workers but not other public sector workers whose roles may also be extremely important, was unfair. The pandemic has shown us all that we are all very much interdependent on a wide range of key workers. Local government workers in Scotland are currently being very badly treated on pay<sup>8</sup>, despite so many going dramatically above and beyond through the pandemic to help look after their communities and the most vulnerable, including our frail and elderly relatives. If NHS workers are exempt from a WPL, why not low paid women in social care, as just one example?

It's argued that the money raised by a WPL could be invested in public transport. That sounds on one level a simple transaction for a common benefit, but the integrated and sustainable public transport system we need must be properly financed. Yet local government funds in Scotland are under severe pressures. If a WPL places undue financial stresses on those on low incomes who have no public transport alternatives, is that really how we are saying we should fund much needed improvements to public transport? Nottingham's WPL is often hailed as a success. Yet there were massive price hikes that trade unions and others had to oppose there in 2019<sup>9</sup> - with some council staff facing a 60% increase. Stacey McMullen, service conditions officer for Nottingham City Unison said in the Nottingham Post report referenced: "Our members' pay isn't going up by 60%. But the only response we get from the Labour city council is that it's due to Government cuts."

## **Conclusion**

UNISON Scotland has major concerns about WPLs. Transport Scotland should ensure that the regulations and guidance require the widest possible consultation with local stakeholders by any local authority looking to implement a WPL scheme, with full transparency. Equalities and accessibility issues must be thoroughly addressed. WPL schemes must be consistent with climate emergency policies and local transport strategies. Employers considering charging employees should be required to only do so as part of fair green travel to work plans negotiated with the relevant recognised trade unions.

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<sup>7</sup> <https://unison-scotland.org/wp-content/uploads/UNISON-Week-266-1.pdf>

<sup>8</sup> <https://unison-scotland.org/local-government-workers-give-verdict-on-latest-pay-offer/>

<sup>9</sup> <https://www.nottinghampost.com/news/nottingham-news/teachers-city-council-workers-pay-2487236>

WPL schemes must not lead to significant detriment caused to, in particular, low paid workers who may have no alternative to car use unless local public transport is dramatically improved. That improvement is vital and should come first. Any WPLs should be structured to help address transport poverty and absolutely must not make it worse.

We applaud the STUC Our Climate, Our Buses campaign<sup>10</sup> calling on the Scottish Government to provide financial support to local authorities to establish publicly owned bus companies. Rather than subsidising private operators, public funding should support more municipal bus companies. Lothian Buses shows such a model can be extremely successful. Local authorities should be prioritising public transport improvements prior to any move to implementing WPL schemes.

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<sup>10</sup> <https://www.facebook.com/scottishtuc/photos/a.10151503246597338/10158455448812338/>  
<https://www.getglasgowmoving.org/media/press-release-scotland-wide-campaign-for-better-buses-launched/>