

**CAMPAIGN AGAINST
LEICESTER'S WORKPLACE PARKING LEVY**

How the City Council's Own Consultation Process Undermines the Case for a Workplace Parking Levy in Leicester

**A trade union report produced by the
Campaign Against Leicester's Workplace Parking Levy,
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Consulting Again... and Again

Leicester City Council have recently completed their second public consultation about their proposed Workplace Parking Levy (WPL) scheme which, if implemented, will see approximately 26,000 workers being taxed £550 a year if they have the misfortune to rely upon their car to drive to work. 4,000 of these workers are NHS staff who will be offered a 50% discount for the first three years of the scheme and will thereafter have to pay the full price of the levy.

The first consultation took place last summer, and most of the people who participated were not supportive of the idea of using a WPL to improve public transport in Leicester. The second consultation process then opened in mid-December and closed on March 13, and it appears that thousands of people have used this consultation process as an opportunity to register their burning discontent with a levy which many people are correctly calling a regressive stealth tax.

Perhaps the most important official consultation document among the eight placed online by the City Council as part of the latest consultation was a document titled "Leicester Workplace Parking Levy: Business Case" (December 2021).

In the short foreword to this document Labour City Mayor Sir Peter Soulsby and Adam Clarke, the Deputy Mayor for Environment and Transportation, make clear that they hope to bring their unpopular levy into force as soon as possible. They write: "We now want to hear from you on our detailed business case for a WPL which will be subject to extensive 12 weeks consultation. The scheme would require Government approval [that is, from the Secretary of State for Transport]. Close working with local businesses during 2022

would be carried out to prepare for its introduction in 2023." (p.5)

The Business Case document explains that "Interested parties and organisations have already commented on the WPL proposals as part of the formal consultation for the LTP [Leicester Transport Plan] and informal consultation on the principles of WPL held in summer 2021." (p.6) The Council document points out that there were 84 comments on the WPL part of the scheme, and they summarise that there was "no general consensus of opinion amongst those responding" (p.7). This ignores the fact that most of the people who engaged on this issue did not support a WPL.

In fact, the document that the Council's Business Case refers to – the "Leicester Transport Plan and Initial Workplace Parking Levy Consultation Report" – actually indicates that the Council received 95 (not 84) individual responses on their initial WPL consultation, of which just 17 were from individual members of the public, with the rest coming from various organisations. Apparently only "25 responses... supported the proposal of a Workplace Parking Levy." (p.11) In an attempt to dig a little deeper into the characterization of these responses, in February representatives from the Leicester and District Trades Union Council met with Council officials and asked them for more details about the views expressed by the 70 other respondents, and it turned out that all of them had all raised concerns about the introduction of a WPL.

The City Council also admit that last summer's consultation obtained formal submissions from just two trade unions (GMB and ASLEF), although Council officials point out that they were able to meet with regional TUC officers. It is worth noting that at no point

were any efforts made by the City Council to contact the Leicester and Districts Trade Union Council. But the self-evident lack of involvement of trade unions in this initial consultation makes sense, as the Council's Business Case document seems to indicate that the views of trade unions and their members are not really their concern. The document outlines the City Council's priorities like this: "Having decided a WPL is likely to be appropriate for Leicester a scheme design needs to be developed that will suit the city's needs, be acceptable to local employers and realise the financial requirements needed for the transport investment programme." (p.17)

Controversially, around the same time that this first (very low key) consultation was taking place, Sir Peter Soulsby was quoted in the *Leicester Mercury* (July 2021) as saying: "We have had discussions with business leaders and trade unions which have been encouraging." Therefore, when representatives of the Trades Council met with City Council officials in February, they made sure to ask if the limited feedback from the two unions or from the TUC could possibly have been interpreted as being supportive of the planned WPL. Contradicting Soulsby's statement, the clear answer from the City Council officials was "No" – the trade union's views were not supportive of the WPL.

The Poor State of Public Transport in Leicester

In providing the "Transport and parking context" for introducing a WPL, the Council's Business Case document mischaracterizes the current extent of bus provision in Leicester when it surmises that: "Accessibility by bus to the city centre, park and ride sites and most employment, health and education sites is generally good but

congestion is a significant problem.” That said they at least admit that “Services are limited in the evenings and weekends and orbital services are limited. The bus fleet is improving, and ticketing improvements are being delivered incrementally. The cost of bus fares and unreliable services are often perceived to be issues when compared with the alternative of driving.” (p.11) This inaccurate view echoes the words contained within the City Council’s “Leicester Bus Service Improvement Plan, 2022-2030” that boldly stated that “Bus accessibility from residential areas to the City Centre is good.”

But the idea that Leicester’s bus services are in any way good is a non-starter for many people who might want to travel to work by public transport. Here the City Council would do well to go back and look at their “Draft Leicester Transport Plan” (which they published in June 2021) which came to a different conclusion. This Plan noted that: “In many areas suitable bus services are either not available at all or are not fast, frequent and reliable enough to encourage people to use them. Waiting facilities, real time information and lack of integrated ticketing also need attention.” (p.29) These words are quoted from the very same report that the Business Case document says should “be read together as the policy justification for the proposed WPL scheme.” (p.12)

Clearly the City Council is not entirely blind to the poor reliability of Leicester’s bus services, and later in their Business Case the Council introduces the findings of their “[Leicester WPL Economic Impact Study](#)” (December 2021) that they had commissioned from De Montfort University researchers. The City Council thus summarizes the “key findings” of the study like this: “Public transport provision was

considered [by those interviewed] to be city-centre focused with satellite County towns and villages marginalised from the network. The perceived high cost of public transport in Leicester and the inefficiency and unavailability of services were recurrent concerns.” (p.29) Indeed, the university study determined that the overall belief of the 18 city employers who were interviewed was “that current public transport provision in Leicester and Leicestershire is generally expensive, inconvenient and inadequate.” (p.97)

The university report concluded that: “The general view was that bus services in Leicestershire, and links between the City and the County, were inadequate; and people living in the County ‘haven’t got access to decent public transport’ to access Leicester.” The report added: “Where services do exist, businesses expressed frustration at the relative lack (or total lack) of early morning and late evening services, reporting that either buses do not start early enough in the day to permit staff to arrive in time for a 3am shift or do not run late enough into the evening to enable staff to travel home after a late (after 10pm) finish. This view was held by all the businesses who employ shift workers.” (p.53) Later the university report stated: “Concern was also expressed about staff wellbeing with respect to using public transport, particularly at anti-social hours and peripheral locations... The issue of caring responsibilities and the school run were also frequently cited as reasons why staff ‘had’ to drive.” (pp.53-4)

A Levy Would Be Detrimental to Low-Waged Workers

In their Business Case document, the City Council assert that the final recommendations” made by the university commissioned Economic

Impact Study “are largely positive” (p.31), which is hardly surprising given that the recommendations were made to assist in the successful implementation of a WPL. Nevertheless, if it is not clear already, despite making positive recommendations, the Business Case is clear that the overall responses of the employers who were interviewed by the university researchers were largely negative: “The cost of the WPL on business was largely unwelcome and concern was expressed about its impact on staff relations, recruitment and retention.” (p.30)

However, the Business Case, in discussing the Economic Impact Study’s predictions of the impact of a WPL upon employees, try to remain upbeat and the document chooses to emphasize two positive outcomes of a levy for employees, while adding that a “detailed review of the potential direct financial impact on employees is presented [later] in 4.3.5.” (p.30) However, in the following page the Business Case document highlights one critical observation that was made by an employer who noted: “If the charge is passed on (in whole or in part) it potentially penalises lower wage employees and shift workers who work at out-of-town industrial estates with relatively poor or non-existent 24/7 public transport links...” (p.31)

More critical information is found within the Economic Impact Study itself which makes it crystal clear that the introduction of a WPL could be particularly detrimental to low-waged workers, many of whom are forced to drive to work out of necessity. The university researchers explain that: “If a £500 levy was fully passed on to an employee earning £20,000 a year this would be equivalent to a 2.5% reduction. That is clearly undesirable for the individual. It may also have knock on effects for the

employer in terms of recruitment and retaining staff. ... While the rate of car use [in Leicester] is highest for the 'top grade' of senior managers (68%) the rate of car use is still high (45%) for those in 'lower grades'. This, again, brings to the fore the need to provide viable alternatives to car use." (p.46)

These critical points are discussed in the Business Case document under the subheading "Economic impact on employees" (that is, in section 4.3.5) but are twisted in such a way that attempts to legitimize charging workers in Leicester a higher levy than that which is applied workers in Nottingham. This is even though the Council's Business Case acknowledges that "Leicester employees are paid less on average than in either Derby or Nottingham," and that census data from 2011 observed that "45% of low-paid Leicester workers commuted by car" (p.45).

Thus, after highlighting Leicester's relative deprivation, bizarrely the City Council argue that the price charged for Leicester's Workplace Parking Levy should be higher than the charge set in Nottingham. The Council admit that "there is the potential for negative consequences of the WPL for certain businesses and employees in the low wage and low skill sectors," and they say that "there is likely to be an upper limit for the levy charge – a charge above which could start to create hardship or other undesirable consequences if passed on in full to low paid employees." Yet even though

Nottingham only charges £428 a year for their WPL, Leicester City Council concludes that a "proposed Leicester charge of £550 is considered to be acceptable and is comparable to the impact on employees of the Nottingham WPL." (p.46)

Building the Way Forward

In the next few weeks, the City Council will be announcing the results of their consultation, and based upon prior experience, trade unionists and community campaigners have few expectations that the Council will listen to the diverse public concerns that have already been raised with their proposed levy. But what the Council need to understand is that by attacking workers with a tax on driving to work they will be pursuing a strategy that will only serve to alienate thousands of workers from engaging in the type of political action that will be necessary to deal with the climate emergency that is facing our planet. The Council need to raise their expectations about what is politically possible if they are to really act in the interests of the people of Leicester.

As if things were not bad enough, our city, like the rest of the country, is already facing a colossal cost of living crisis, and so taxing workers so they can make marginal improvements to our failing public transport network provides no hope, or solutions, to the increasing numbers of our city's working poor. Instead, if the Council were serious about

acting to address the climate crisis they would focus their sights higher and work to help trade unionists nationwide build the type of mass campaign that can force meaningful solutions from the corrupt powers that be.

For a start we need to stop talking about funding private sector profiteers at the taxpayers' expense to misrun our bus services and act to take the entire bus network into public ownership, so that it can be run democratically by workers, for workers.

There is much that needs to be done and supporters of the Campaign Against Leicester's Workplace Parking Levy are keen to do what we can to fight for a better and greener future for our city and the planet, but we remain clear that we refuse to accept that punishing workers is an appropriate way of moving forward.

Footnote

At the end of the City Council's Business Case document the report acknowledges that Sue Flack Consultancy (SFC) was "commissioned to write the LTP and the WPL business case" (p.66). Sue Flack started her business in 2016 after serving for four years as Nottingham City Council's Director of Planning and Transport. Her consultancy boasts that she provides "specialist advice on development of Workplace Parking Levy schemes, with unique experience in developing the only current operational workplace parking levy scheme in the UK (in Nottingham)."

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