

# Leicester City Council

# Workplace Parking Levy Consultation Report

November 2022

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#### 1.0 Introduction

Leicester City Council undertook a 12-week consultation from 16<sup>th</sup> December 2021 to 13<sup>th</sup> March 2022 on a proposed Workplace Parking Levy (WPL) for Leicester City. The purpose of the WPL would be to manage traffic demand through a levy on employers, which would fund the delivery of transformational transport improvements within the city. Over 4,000 stakeholders participated during the formal consultation period, including members of the public, employers, employees and unions.

If Leicester City Council is to deliver against very challenging Government decarbonisation and air quality ambitions and meet people's transport needs in a rapidly growing city, it is essential that the necessary funds are secured to invest in our public transport plans. WPL was identified as a means of ensuring ongoing annual income rather than relying on periodic and uncertain Government grants, as well as working to reduce overall dependency on private vehicles within the city.

The WPL Business Case noted that the levy, alongside leveraged funding from government and other sources, could generate £450 million over the next 10 years to deliver the vision laid out in the 2021 draft Leicester Transport Plan (LTP) including:

- A transformational eight year 'Bus Service Improvement Plan' through the new 'Leicester Buses Partnership'. Over 400 high quality electric tram-like buses will be the norm by 2030 operating on 25 'Mainlines' services across city neighbourhoods and five express 'Greenlines' commuter services including three cross city links to six park and ride sites and two new orbital services.
- A first-class travel experience for the bus user with bus priority on key routes delivering reliable services at a good frequency, integrated timetables and multi-operator digital ticketing across services and quality waiting facilities with real time displays.
- Affordable bus fares with discounts for elderly, disabled, young and unemployed people and the ability for all travellers to get the 'best fare' on any journeys across the city.
- A world class city-wide network of cycleways, for long and short trips, that link routes already built in the centre of the city directly into and between local neighbourhoods.
- Connected healthy neighbourhoods with safe attractive walking and cycling routes, support for electric vehicles, better local buses with flexible on-demand services and good air quality, delivering the concept of '15 min neighbourhoods' with quick and easy access to local facilities.
- Investment in the rail station to ensure it is well connected regionally and nationally and an impressive gateway to the city, building on the £22m recently secured to revamp the station.

The council has worked closely with Nottingham City Council to develop proposals for Leicester. Their successful WPL scheme has operated for over ten years and has helped to fund major transport benefits for local people, while there is no evidence of any significant adverse effect on the city's economy. An economic impact study was undertaken by De Montfort University on the potential economic and social impacts of a WPL scheme in Leicester, and the recommendations, which are detailed in the business case (3.3, p28) were considered in the development of the proposals.

This report analyses the consultation responses received from a variety of different engagement activities including meetings with employers and others, but primarily from a Citizen Space questionnaire (included in Appendix A). Section 2 of the report describes the

consultation process and Section 3 summarises the main findings of the consultation and council responses. Detailed responses are included in Appendix B.

#### 2.0 Consultation

This section describes the consultation process and methods used during the formal consultation period as well as engagement with stakeholders, including employers.

#### 2.1 Consultation process

A range of methods were used as part of a wide-ranging consultation exercise including:

- Leicester City Council's Consultation Hub, Citizen Space questionnaire
- Over 640 emails were sent to stakeholders to notify them of the consultation and to invite their views.
- Extensive publicity before the consultation process started, including through the Leicester Transport Plan consultation conducted in Summer 2021, and during the formal consultation process through the Council's website, radio, local press release and social platforms - Twitter and Facebook - see Appendix C for a list of media coverage.
- **Presentations and engagement sessions** took place with stakeholders to capture views. Due to the Covid-19 pandemic, these were all undertaken virtually.

#### 2.2 Consultation response

- 4,150 stakeholders participated in the consultation, including:
  - 4,051 completed online Citizen Space questionnaires
  - 99 emails

In addition, the Council reached out extensively to stakeholders (employers in particular) and there were over 40 virtual engagement sessions (see Appendix D) attended by over 500 stakeholders. Comments made at these meetings have been included in this report. Appendix E lists all employers who participated in the engagement sessions.

The following section provides information on who responded to the formal consultation.

#### 2.2.1 Respondent profile

Table 2.1: Citizen Space Respondents

Stakeholder	Total*	Percent
Employee	2970	56%
Member of the public	1360	25%
Stakeholder status not declared	673	13%
Business owner / manager	91	2%
Organisational representative	127	2%
Other	108	2%
TOTAL	5329	

<sup>\*</sup>Total exceeds 4150 as some respondents indicated more than one option

#### 2.2.2 Demographic breakdown of representations:

Consultation data (responses to Citizen Space) was used to identify the demographic breakdown of representations using postcode analysis:

**Table 2.2 Postcode Analysis:** 

Responses	No.
Postcodes	
Total with postcodes	3755
Total with valid postcodes	3728
Postcodes not found	27
Postcode demographics	
Leicester City	2643
Leicestershire & Rutland	1029
Rest of the country	83

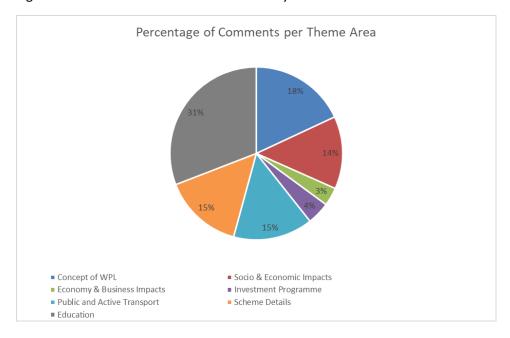
Appendix F shows the distribution map of responses in Leicester, Leicestershire and outlying areas. Approximately three quarters of responses came from within Leicester City with the remaining quarter mostly from Leicestershire and Rutland.

#### 2.3 Consultation analysis

Over 18,000 individual comments were received on the proposals. Each response was reviewed and all the relevant comments were identified and recorded within the City Council's Citizen's Space Consultation Hub, which is designed to manage large scale public consultations. The individual comments were then grouped into common issues and centred around the following themes.

- 1. Concept of a WPL
- 2. Economy and business impacts
- 3. Socio-economic impacts
- 4. Proposed use of revenue for the WPL investment programme
- **5.** Public and active transport
- 6. WPL Scheme details
- 7. Education issues

Fig 1: Total number of comments received by theme:



Most comments were recorded for the following themes:

- Education issues (31%)
- Concept of a Workplace Parking Levy for Leicester (18%)
- WPL Scheme Details (15%)
- Public and active transport (15%)
- Socio-economic impacts (14%)

#### 3.0 Summary of comments made

This section presents a summary of the main/most significant comments received. Detailed comments and responses are provided in Appendix B.

#### 3.2.1 Concept of WPL

Appendix B2 contains detailed responses between the headings of C1 and C11.

Comments on concept of WPL	Council response
Although it was agreed that reducing car use is a priority to achieve environmental	Alternatives to a WPL were given careful consideration as part of the WPL Business
aims, respondents challenged both the	Case. Ambitious plans for transport are set
need for a charging scheme and whether	out in the draft Leicester Transport Plan,
WPL is the right charging scheme.	and the desire to see an increase in active
	and sustainable travel alongside a
	reduction in car usage for short and
	medium trips led to the WPL as a potential
	way to provide a source of ongoing funding
	in support of sustainable modes alongside
	a means of disincentivising car journeys
The form of the consultation itself was	Consultation on WPL was extensive and
questioned	conducted in two parts – firstly as part of
	the Leicester Transport Plan consultation in
	Summer 2021 and then in through the 12
	week formal consultation. This formal
	consultation follows the standard practice of the council. Note - there is no prescribed
	form for consultation on a WPL proposal.
Revenue received might not be spent on	By law, WPL revenue must be spent on
the proposed WPL Investment Programme	transport improvements meeting the
and even if it was, it would not help those	objectives of the LTP. The WPL Economic
who had paid and is unfair.	Impact Study assessed the impact on the
·	local economy, businesses and employees.
	The recommendations of this study were
	included in the WPL proposals. The
	Business Case describes the ways
	proposed by the City Council for making the
	WPL charge fairer (3.6, p40)
A WPL scheme would generate additional	Potential issues following implementation,
problems such as displaced parking in	such as displaced, anti-social, or
nearby residential streets.	obstructive parking, had been identified as
	possible in the business case- if they were
	to occur, these would be mitigated through
	parking controls and other highway
	improvements funded by the WPL.

#### 3.2.2 Economy and business impacts

Appendix B3 contains detailed responses between the headings of B1 and B4

Comments on economy and business impacts	Council response
Inward investment and local business investment will be affected, and employers will suffer recruitment and retention problems. There is no justification for an indefinite levy. Businesses will relocate outside the city and the city centre will become a ghost town.	The WPL business case did not identify any significant economic and business impacts and in particular noted that there is no evidence of significant negative economic impacts in Nottingham, where WPL has been in operation for 10 years. Transport improvements will be ongoing over many years – the WPL Investment Programme was initially for the first 10 years of operation.
Currently some employment sites are not well served by public transport and not easily accessed by foot or cycle.	Proposed improvements to public and active transport, via the funds levied under the WPL, would allow substantial improvement to locations currently underserved. Continual employer engagement would continue to identify barriers to journeys and work to overcome such issues.
The after-effects of the pandemic and current cost of living crisis are also adversely affecting business, and small businesses would be unduly affected by WPL	The Council proposed measures to ease the burden for businesses such as an exemption for operational vehicles, an extensive small employer discount and a proportionate charge.
Special arrangements should be made for shifts, part time workers and anti-social hours workers.	Special consideration could be given to arrangements for charging in relation to shift, part-time and anti-social hours working patterns.

#### 3.2.3 Socio-economic impacts

Appendix B4 contains detailed responses between the headings of SE1 and SE6.

Comments on socio-economic impacts	Council response
The proposals do not take enough account	Some respondents were not aware that it is
of the needs of low paid workers, those with	employers who would be charged in the
childcare needs, people with disabilities,	first instance, and who can, if they wish,
women and those who have very active	choose to pass a charge on to employees,
manual jobs (who might not be able to use	and take into account their different
active travel modes).	circumstances e.g. by charging higher paid
	employees more and lower paid less.
	Examples of this are evident in Nottingham.
	The provision of much improved public
	transport services as proposed through
	WPL investment would also benefit those
	unable to afford a car.
	An Equalities Impact Statement was
	produced and would be updated
	continuously during the WPL process.

The current cost of living crisis in the whole The WPL proposal was developed before country makes paying a levy difficult for the current cost of living crisis and it is acknowledged that this could have an everyone. impact on ability to pay a levy charge for some individuals and businesses and further work would be required to understand this better As noted above, the employer is charged under the principles of a WPL and it is their choice to absorb or pass on costs to staff including through bespoke fair charging methods The WPL will fund lower cost alternatives to owning and using a private vehicle, including passenger transport and better walking or cycling routes.

#### 3.2.4 Use of revenue and proposed WPL investment programme

Appendix B4 contains detailed responses between the headings of RP1 and RP4.

Comments on use of revenue and proposed WPL investment programme	Council response
Many people had further ideas for what should be included in the WPL Investment Programme, and also thought that the vision for transport in Leicester should be promoted much more strongly.	All ideas about what should be included in the WPL investment programme can be considered in terms of their benefit and impact. There will be opportunities for continuing engagement as part of the development of the Leicester Transport Plan (LTP). The vision for transport set out in the LTP can and should be promoted more strongly.

#### 3.2.5 Public and active transport

Appendix B5 contains detailed responses between the headings of PT1 and PT7.

### Comments on Public and Active Transport

There was general support for the proposed transport improvements, although some people did not think that rail should be included. Many people said that public transport is not currently fit for purpose in some areas, or affordable, and cycling can be unsafe. Safety on public transport was also raised.

#### **Council response**

The emerging Leicester Transport Plan (LTP) is intended to set the policy for improving public and active transport over the next 10 years, and the WPL is a potential means to contribute towards funding improvements over that period. Current public transport, cycling and walking improvements funded by the Transforming Cities Fund and other Government grants will be complete by 2025 and demonstrate what can be achieved through a significant scale of investment. Further funding at scale is however required to deliver a comprehensive fit for purpose network

Rail is important for the movement of goods and people at medium and long distances, and improvements to the access and utilisation of the network will benefit city residents and businesses. The council is working closely with Midlands Connect and other partners to develop regional rail improvement plans and schemes. These are referenced in the LTP. Improvements to the Leicester Rail Station funded though the Governments Levelling UP fund are committed and the WPL was identified as potentially contributing to later phases of station improvement.

Funding obtained via the WPL must be used to develop and implement transport schemes, and will lead to an improvement on the quality and nature of provision within Leicester

The city council will continue to work with residents and partners to identify safety concerns and deliver local improvements on the cycle network and for public transport.

#### 3.2.6 WPL Scheme details

Appendix B6 contains detailed responses between the headings of SD1 and SD11.

Comments on Scheme Details	Response	
The proposed charge is too expensive, and the proposed transport transformation should be complete before any charges are made.	Fairness was a key consideration when deciding on proposed WPL scheme details. The proposed charge, which is approximately equivalent to a single bus fare, was assessed in the Economic Impacts Study and in the WPL Business Case (4.3 p43).	
	The first phases of the transport vision are being delivered now (complete before 2025) but will not cover the whole city. Further funding is required to ensure the whole city has access to a high-quality network for active and sustainable travel.	
Many responses related to discounts and exemptions. Some included proposals for additional discounts and exemptions e.g. for employees with childcare responsibilities, those with disabilities and essential car users.	Proposed discounts and exemptions were assessed objectively with reference to the successful scheme in Nottingham, whilst taking into account that the WPL charge is made on employers in the first instance, not employees. Employers could, if they wish, pass the charge on to employees in different ways – for example charging higher paid employees more and lower paid less, and if they choose, to charge only non-essential car users and take account of those with childcare responsibilities.	

#### 3.2.7 Education comments

#### Education comments

Schools would have a choice between making WPL payments from already stretched school budgets, or charging staff, which would have an unacceptable impact on recruitment and retention.

Currently some school sites are not well served by public transport and not easily accessed by foot or cycle. Imposition of a WPL might result in displaced parking on to nearby residential streets.

#### **Council responses**

School bodies, like all employers, would need to consider options in terms of funding the WPL themselves or passing the charge, wholly or partly, onto employees. As noted above, there would be options for employers to consider in terms of how the charges are passed on fairly to take into account specific circumstances, including for example, charging according to salary levels and to take into account recruitment and retention issues.

The City Council would wish to support the development of fair WPL charging strategies working with all employers, including schools, and in partnership with school leaders, consider how best to manage the introduction of the levy, as well as encouraging employees to use both

existing and new sustainable transport services as they become available.

WPL has been successfully introduced in Nottingham where schools are charged the levy. Some choose to fund this as an employer and some pass on the costs to employees.

Potential problems such as displaced parking have been considered and, if they occurred, would be tackled working closely with schools and residents.

It could be illegal or unlawful to use education budgets to pay WPL, and that if those budgets were used there would be an unacceptable impact on children's education. Therefore, it was proposed that schools should be given a discount or exemption because of their social and educational value.

There are not considered to be any legal issues preventing school bodies from paying a WPL and WPL has been successfully introduced in Nottingham with no challenge from schools to this end.

The case for additional discounts for schools was considered carefully. However, it was concluded that commuter cars used by school staff contribute just as much to poor air quality, congestion and carbon emissions as commuter cars from other employers. Employers should be treated on the same basis.

## Appendix A Consultation Questionnaire

Please note that Appendix A is intended for reference purposes only and is currently not fully accessible to screen readers. If you wish to view the consultation questionnaire via a screen reader please visit: <a href="https://consultations.leicester.gov.uk/sec/wpl-reference-copy">https://consultations.leicester.gov.uk/sec/wpl-reference-copy</a>

Please note that the consultation is now closed and any responses submitted via this link will not be considered.

#### Workplace Parking Levy

#### Overview

It is clear that if the council is to meet challenging decarbonisation, air quality and health ambitions, implement COVID-19 recovery plans, and deliver on people's travel needs in a rapidly growing city, substantial additional funding will be needed to deliver our ambitious transport plans.

A workplace parking levy for Leicester would provide transformational investment, with total funding of some £450m, to help deliver our ambitions for a well connected, environmentally friendly, and affordable citywide bus, cycling and walking network.

A levy would support delivery of a 10-year annual investment programme, whilst reducing reliance on uncertain Government grants. Building on the success of major investments through our Connecting Leicester and Transforming Cities Fund transport initiatives, a workplace parking levy would further support delivery of:

- A transformational 8-year 'Bus Service Improvement Plan' through the new 'Leicester Buses Partnership'. Over 400 high quality electric tram-like buses will be the
  norm by 2030 operating on 25 'Mainlines' services across city neighbourhoods and five express 'Greenline' commuter services including three cross city links to six
  Park & Ride sites and two new orbital services.
- A first-class travel experience for the bus user with bus priority on key routes delivering reliable services at a good frequency, integrated timetables and multioperator digital ticketing across services and quality waiting facilities with real time displays.
- Affordable bus fares with discounts for elderly, disabled, young and unemployed people and the ability for all travellers to get the 'best fare' on all journeys across
  the city.
- · A world-class citywide network of cycleways, for long and short trips, that will link current routes in the city centre directly with, and between, local neighbourhoods.

These ambitious plans — included in the Leicester Transport Plan (draft) — would deliver early sustainable transport benefits to both residents and businesses across the whole of the city rather than investing in large and expensive fixed transport systems with long delivery timeframes such as a tram.

As part of the development of our case for a workplace parking levy the council has worked closely with Nottingham City Council. Their successful workplace parking levy scheme has operated for nearly ten years and has seen major transport benefits for local people without any significant impact noted on the economy or businesses.

Detailed studies have been carried out by De Montfort University into the need for a workplace parking levy and its economic impact, and environmental, transport and health impacts have also been assessed.

Extensive consultation has already been carried out involving hundreds of local people and businesses. We have refined our thinking and propose what we believe to be a fair and equitable scheme with additional safeguards such as exempting blue badge holders and measures to deal with any parking displacement.

#### Why your views matter

We now want to hear from you on our detailed business case for a workplace parking levy, which will have an extensive 12-weeks consultation. The scheme would require Government approval. Close working with local businesses during 2022 would be carried out to prepare for its introduction in 2023.

The workplace parking levy has the potential to help Leicester lead the way on global environmental challenges and transform the city into an outstanding place to live and work where high quality, user-friendly and affordable options for people to travel by bus, bike and foot are available across a growing city.

The benefits of investing in sustainable transport to bring about a reduction in traffic are easy to visualise as we see it during school holidays where a 10% reduction in peak morning traffic on some roads can make it much easier and healthier to get about in the city.

#### Consultation menu

Which of these would you like to view / comment on
(Required)
Please select only one item
WPL summary (five pages)
Full WPL business case
Supporting documents
Leave a Quick Comment
Go to end of consultation (submit response)

Please note: you can return to this menu at any time

Are you responding as (please tick all that apply)
Please select all that apply
A member of the public
An employee
A business owner / manager
An organisation representative
Other
If Other, please specify
Organisation name (if applicable)
What is your home / work postcode? (as appropriate)
Please note: we collect postcode data to gain a better understanding of which parts of the city / county respond to our consultations. We cannot identify individual properties or addresses from this information.

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Workplace parking levy business case comments - page 2

Comment 6	
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What is workplace parking levy?	
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Alternatively click <b>&lt;<first< b=""> at the bottom of the page</first<></b>	if you want to return to the beginning of the consultation / main menu.

https://consultations.leicester.gov.uk/sec/wpl/consultation/print\_survey

#### View information relevant to this page (click to open / close)

A workplace parking levy is a licensing scheme that enables local transport authorities to charge a levy on Workplace Parking Places, as defined in s182 of the Transport Act. 2000

The levy is charged to the occupier of the premises, normally the employer, who may then pass all or part of the charge to employees using the parking places.

Currently there is only one workplace parking levy in the country, in Nottingham, although several other authorities are interested in implementing a similar scheme.

The legislation allows for exemptions and discounts. Authorities must specify scheme details that are particular to their own areas in a Scheme Order, which for Leicester can be found here.

In England and Wales outside London, detailed justification for each proposed workplace parking levy scheme must be submitted to and approved by the Secretary of State for Transport before it can be implemented.

The Workplace Parking Levy Business Case is not however intended for the purpose of applying for Government funding but to present information and analysis of the workplace parking levy proposals to be introduced in a local area.

The following categories of parking are outside of the scope of the workplace parking levy as defined in the legislation:

Parking for ordinary retail, hospitality, entertainment, and leisure customers/users

Residential parking

Single person microbusinesses where the employer lives and works at the same address

Parking for fleet vehicles (unless they are also used for commuting purposes)

Vehicles displayed for sale

Preparation work for the business case has been disrupted by COVID-19, including a survey needed to confirm the likely numbers of chargeable Workplace Parking Places.

Leicester City Council, working with Nottingham City Council, has found robust ways of estimating parking numbers and other required information.

Comments		

Why we are proposing a workplace parking levy

View information on why we are proposing a workplace parking levy The Leicester Transport Plan

The Leicester Transport Plan <user\_uploads/leicester-transport-plan-draft-2021-2036.pdf> (draft) 2021–2036 brings together the wider objectives that relate to transport such as the growth of the city, the climate emergency and the need to improve health and transport options for residents and sets out specific transport objectives and policies.

The Leicester Transport Plan states: "Leicester City Council will investigate the potential for a workplace parking levy alongside other local funding sources".

A workplace parking levy contributes to the Leicester Transport Plan's transport objectives including reducing the need to travel by car; making public transport — Park & Ride, cycling or personal e-mobility — the first choice for longer journeys for most people; making active transport the first choice for shorter journeys for most people; ensuring neighbourhoods are better connected throughout the city; and managing the road network and to tackle congestion, air quality and road safety across the urban area

The Leicester Transport Plan sets out an ambitious vision for transport in Leicester. A workplace parking levy is required to bring forward priority projects and to help achieve the Leicester Transport Plan's objectives within the 2021–2036 time period.

The council's Transforming Cities Fund projects and the improvement of St Margaret's Bus Station are already delivering the implementation plan, and the recent successful Levelling Up bid for Phase 1 of the Rail Station Transformation will continue this.

One of Leicester's biggest challenges will be funding delivery of the Leicester Transport Plan's ambitious vision and it will be necessary to make the most of all opportunities as they arise. This challenge has been heightened by the recent publication of Decarbonising Transport which includes the Government's very ambitious targets for increasing bus patronage, walking and cycling as well as a large-scale transformation to alternative fuels. These targets are likely to be incorporated into Leicester's forthcoming 'Roadmap to Net Zero'.

The workplace parking levy would play a key part of the funding package to address these challenges.

#### Local charging options

Two local charging options have been considered — Road User Charging (RUC) and the workplace parking levy. The principal difference between the two is that RUC is a direct charge on the use of a scarce resource (drivers using roads) and a workplace parking levy is an indirect charge on a facility used by vehicles (employers charged for workplace parking).

The rationale for choosing a workplace parking levy for Leicester is it contributes well to the Leicester Transport Plan's objectives and provides funding for priority projects in the first ten years of operation.

It can be implemented to follow on seamlessly from the Transforming Cities projects that are underway and demonstrates to employers and residents the benefits of a long-term programme of similar initiatives

#### Benefits of a workplace parking levy

A workplace parking levy has two main purposes — to encourage car commuters to consider alternative forms of transport, and to provide funds for transport projects, all meeting the objectives of the Leicester Transport Plan.

It has the following benefits:

Supports urban regeneration and improves the city by helping to fund quality public transport and active travel

Delivers better public transport and active travel, provides health and air quality benefits, as well as contributing to the council's carbon reduction plans

The scheme contributes to managing congestion both by encouraging people to try other more sustainable options and by funding improvements to those transport options

A workplace parking levy can free up parking areas for development as employers reassess their workplace parking provision, and can free up road space for reallocation to support public transport and active travel.

Leicester City Council has adopted the following principles to maximise the benefits of a workplace parking levy:

The levy scheme, and the associated package of public and active transport investment, will be designed to meet Leicester Transport Plan's objectives by contributing to reduction of carbon emissions, managing congestion, and improving health, air quality, connectivity, transport choices, and accessibility

The workplace parking levy will support the Leicester economy, including measures to address the impacts from the COVID-19 pandemic

It will be flexible in the treatment of different circumstances, financially efficient, and meet the Leicester Transport Plan's timescales

The scheme will be designed to be simple, easily understood, and enforceable

Leicester City Council will ensure the scheme is compliant with the Transport Act 2000 as well as with legal requirement in general

Employer support and assistance will be provided to minimise the burden of complying with the scheme as well as administration and the charge itself

Actions will be taken to address any displaced parking problems, whether in the city or county areas, that may be caused by the scheme

The impacts of the scheme will be monitored with results made available locally and to central government

#### Business support and advice programme

A business support and advice programme is considered vital to ensure the smooth operation of a workplace parking levy, and this has been confirmed by the Nottingham experience.

The programme will consist of advice to employers liable for paying the the levy, including how to assess chargeable parking places, as well as how to manage workplace car parking more effectively.

Advice and guidance will also be provided to employers and their staff on options to travel to work conveniently by bus, cycle, and walking to take advantage of existing and new transport facilities provided using the workplace parking levy funds.

A Displaced Parking Task Force working jointly with Leicestershire County Council is considering potential impacts from employees choosing to park on congested streets to avoid a workplace parking levy.

Parking hotspots will be identified whether inside or outside the the city's boundaries, and action taken to control parking, for example through resident's parking schemes.

1	Comments							

#### Scheme details

#### View workplace parking levy scheme details

#### Proposed boundary

The Leicester City Council boundary <user\_uploads/leicester-boundary-map.jpg> is proposed as the boundary for the workplace parking levy scheme, as employers are distributed across the city, all of which contribute to city transport issues and challenges.

The need for more transport options has been raised when discussing the workplace parking levy proposals with employers, particularly those based outside the city centre.

A comprehensive citywide transport plan is proposed to help ensure that all workplaces have sustainable transport options as far as is practicable.

#### Workplace parking levy charge level

A decision on the level of a workplace parking levy charge is a judgement based on the following factors:

Total receipts to help fund the transport improvements required

Impact on traffic (using evidence from the traffic model)

Impact on employers and employees (using evidence from the Economic Impact Study)

The final proposal is for a workplace parking levy charge of £550 pa which is considered reasonable and justifiable for both employers and employees. It would provide sufficient income for the transport investment programme and have an appreciable effect on congestion, air quality and carbon, particularly in reducing demand for cars and increasing use of sustainable modes of travel.

#### **Exemptions and discounts**

The workplace parking levy legislation allows for exemptions and discounts, which may be based on:

Type of employer (such as emergency services)

Type of vehicle (such as motorbikes)

Type of user (such as Blue Badge holders)

Exemptions relate to Workplace Parking Places for which a workplace parking levy licence is not required. Premises with Workplace Parking Places given 100% discounts need to obtain a workplace parking levy licence but are not charged. Discounts may also be given at reduced rates, not necessarily at 100%.

#### 100% discount

It is proposed to give a 100% discount to workplaces with 10 or fewer Workplace Parking Places (as defined in the Transport Act 2000) following the Nottingham example. Although this means accepting a considerably lower level of revenue as up to 90% of employers would not have to pay, the value lies in supporting small businesses, especially those in the sectors with high competition, and the reduction of complexity of operation and enforcement.

#### 50% discount

It is proposed to give qualifying NHS premises a 50% discount for three years only, and then charging the full fee thereafter. This allows time for NHS operations to recover from Covid-19 pressures, UHL to complete the planning and progress implementation of its premises reorganisation proposals and also work with Leicester City Council on improving sustainable travel options for employees

#### Other proposed exemptions and discounts:

Exempt:

Delivery vehicles

Vehicles used by occasional business visitors

Fleet vehicles (unless also used for commuting)

Vehicles used by business customers

100% discount:

Emergency Services (Fire, Police, Ambulance) premises

Workplace Parking Places used by Blue Badge holders

Unpaid volunteers.

(	Comments				
1					

Assessments and first stage consultation results

#### View details

A variety of methods to assess the introduction and impact of a workplace parking levy were used. Studies were commissioned to help inform the options and assessments, and Leicester City Council is working alongside Nottingham City Council to develop the proposals based on their extensive knowledge and experience.

Key studies and assessments are as follows and issues raised are dealt with in the full business case.

Workplace Parking Levy: An evidence-based review of policy and prospects for Leicester <user\_uploads/wpl-an-evidence-based-review-of-policy-and-prospects-for-leicester--1.pdf> (De Montfort University) This provided the technical and background information on which decisions were made regarding the suitability of a workplace parking levy for Leicester.

• The report concludes that there are good practical reasons why a workplace parking levy should be considered for Leicester as it is generally more acceptable than Road User Charging, but that businesses should be properly consulted and consideration needs to be given to possible 'side effects' like displaced parking.

Transport modelling <user\_uploads/workplace-parking-levy-traffic-modelling-report-1.pdf> (AECOM and Edwards and Edwards Consultancy Ltd) This provided a high-level evaluation of the possible traffic impacts of a workplace parking levy based on the likely charge level, number of chargeable Workplace Parking Places and proposed investment programme

• Results show that the workplace parking levy by itself is predicted to have a minimal impact on the highway network but a workplace parking levy plus the impacts of the investment programme (transformed bus services, citywide cycling network, Connected Healthy Neighbourhoods and future phases of the rail station masterplan) predicts peak time morning traffic falling by about 10%, similar to what currently happens in parts of the city during school holidays.

**Economic Impact Study** <user\_uploads/workplace-parking-levy-economic-impact-study--dmu--1.pdf> (De Montfort University Business School) This study looked at both the impact on the city as a whole and the impact on individual businesses and employees. The information was used to inform all stages of the assessment work, particularly the levy charge and possible exemptions and discounts.

The Economic Impact Study took the form of a desktop analysis of whole-city economic issues, based on a broadly representative sample of 66 large businesses, and a qualitative, in-depth representative survey of 18 employers, all larger private sector employers, and organisations such as universities and hospitals.

18 recommendations were made on the themes of costs and benefits, use of revenue, equity and transparency, communication and leadership, the
impact of COVID-19 and evaluation. Issues highlighted included low pay, high levels of competition in certain sectors, need for improved public transport
especially outside the city centre and shift times/part time working and the need for support packages for businesses to assist with the introduction of the
workplace parking levy.

Accessibility Assessment <user\_uploads/ltp4-accessibility-analysis-1.pdf> (ITP) The workplace parking levy was including in this assessment as a key proposal in the Leicester Transport Plan (draft) 2021–2036.

Workplace parking levy funds from the scheme will be used to deliver new citywide active travel infrastructure and public transport network improvements
which will have significant positive accessibility impact for all residents, commuters, and visitors to the city. By giving 100% discount to Blue Badge
Holders we will help to ensure that disable people are not disproportionately impacted. Low income households also stand to benefit significantly from the
investment of workplace parking levy funds in sustainable transport, as they are less likely to have access to a car - but could experience more negative
impacts if the charge is passed onto employees. Mitigation measures to help address this are needed.

Strategic Environmental Assessment <user\_uploads/ltp-sea-summary-non-technical-1.pdf> (Royal Haskoning DHV) A workplace parking levy was included in this assessment as a key proposal in the Leicester Transport Plan (draft) 2021–2036

Overall, it is considered that the Leicester Transport Plan (draft) 2021–2036 strategies will result in significant positive social effects in terms of protecting
and promoting people's safety and their physical and mental wellbeing, and in terms of improving air quality.

Equality assessment - his document is continually updated throughout the process and is available on request from Leicester City Council.

Con	nments				

Workplace parking levy investment programme

#### View information about the investment programme

Leicester's workplace parking levy will be part of an ambitious programme of transport improvements to be delivered over the next ten years, intended to help meet the city's decarbonisation, air quality, health ambitions, COVID-19 recovery plans, and deliver on people's travel needs sustainably in a rapidly growing city.

A workplace parking levy will contribute directly to delivering the three key themes in the Leicester Transport Plan (draft) 2021–2036:

Connected corridors and hubs

Healthy streets and neighbourhoods

Managing demand for car use

The workplace parking levy contribution secured will be part of an overall funding package which envisages contributions from the Government and bus operators for example.

A workplace parking levy will help to stimulate a total package of funding of some £450m over ten years, which would not be available without a workplace parking levy to provide match funding.

#### What is the funding gap that a workplace parking levy can fill?

Capital funding is key to transport transformation and the draft Leicester Transport Plan covers the period to 2036 to match the timescale of the draft Leicester Local Plan.

Many of the capital projects and programmes that are due to be delivered in the next three years are already funded from the Transforming Cities Fund and other Government grants. The gap in capital funding starts in 2024 when the Transforming Cities Fund programme is completed.

Revenue funding for projects such as active travel initiatives and supporting bus services is a challenge to secure with little local or Government funding currently available.

Leicester City Council is in competition for funding streams so cannot rely on them to sustain even existing projects and needs an ongoing income stream from the workplace parking levy to be able to sustain and deliver proposed improved services.

Leicester is already making use of opportunities for additional Government funds using prospective workplace parking levy receipts as match funding - this is continuing to be developed, for example the successful ZEBRA electric bus scheme.

It is likely that there will be other significant opportunities in the coming years, including those generated from the national Transport Decarbonisation Plan and the Leicester Bus Services Improvement Plan (BSIP).

#### Proposed priority projects for the workplace parking levy funding (first 10-year plan)

Spending in the early years will be focused on delivering greatly enhanced bus networks and services with more affordable fares, creating a citywide cycle network, and developing Connected Healthy Neighbourhoods.

Following the successful funding bid for Phase 1 of the Leicester rail station, the workplace parking levy spending will, in later years, include future phases of the Rail Station Masterplan

#### **Bus Service Improvement Plan**

A **Bus Services Improvement Plan** <user\_uploads/leicester-bus-services-improvement-plan-1.pdf> developed by the new 'Leicester Buses Partnership' to transform city bus services will bring cleaner, greener, and zero-emission travel to Leicester with over 400 high quality electric tram-like buses by 2030 operating on 25 'Mainlines' services across city neighbourhoods and five express 'Greenline' commuter services including three cross city links to six Park & Ride sites and two new orbital services.

A first phase of 11 electric buses, powered by 100% renewable energy, replaced diesel vehicles on Leicester's three Park & Ride routes in May 2021.

Government funding has been secured for a further 96 electric buses to be in service by 2024. This and subsequent phases will support commuters and local journeys across neighbourhoods, serving areas of the city with large employment clusters, hospitals, universities and major shopping and leisure destinations.

A first class travel experience for bus users will be provided by building bus priority measures on key routes in the city to deliver reliable services at a good frequency, developing integrated timetables and multi-operator digital ticketing across services and delivering quality waiting facilities with real time displays.

The plan proposes affordable bus fares with discounts for elderly, disabled, young and unemployed people and the ability for all travellers to get the 'best fare' on all journey across the city from all of the main bus operators.

#### World class citywide cycle network

The expansion of infrastructure to deliver a citywide network of safe and attractive routes to meet the growing demand for schemes across Leicester, including building links between neighbourhoods and the city centre.

This will build on the successful delivery of Connecting Leicester projects that have transformed the city centre and adjacent areas with improved cycling and walking zones and launch of Santander Cycles Leicester with 500 electric bikes available for hire at 50 locations across the city centre.

The workplace parking levy will fund infrastructure to increase safe and attractive cycling and walking options, creating new cycle lanes, safer junctions, and incentives to encourage people to make use of these new facilities.

We are aiming for 50% of all journeys in the city to be by walking or cycling by 2030, which is the Government's aim in Decarbonising Transport

#### Connected Healthy Neighbourhoods

This will build on the successful delivery of Connecting Leicester projects that have transformed the city centre and will deliver new links helping to develop the concept of '15 minute neighbourhoods' where local services and facilities are within safe and easy reach for pedestrians and cyclists.

Works will include environmental improvements to streets, charging points for electric vehicles, and improved local bus services. Lower levels of traffic will mean better air quality and reduced carbon emissions.

Grants will be available for sustainable transport projects and incentives will be created for active travel. Schemes will be developed with residents and local stakeholders including schools and businesses

#### **Rail Station Transformation**

Phase 1 of the Rail Station transformation programme to create a high quality 21st century station and interchange is now largely funded from the Government's Levelling Up programme, which will see £22m invested in creating an attractive new entrance and plaza facing the city centre, improved booking hall and improvements to the porte cochère for hospitality and commercial purposes.

Future phases, which will need workplace parking levy funds, will focus on improving the passenger experience, as well as enabling regeneration of sites around the station.

The aim is to provide a transformed travel experience and gateway into the city for current travellers and the expected 33% increase in rail passengers by 2036.

#### Calculating the first 10-year investment programme

A 10-year investment programme has been developed to indicate how workplace parking levy receipts would be spent, with an indication of how much additional money could be brought in.

To take account of various risks such as the yet unknown impact of COVID-19 on future parking numbers, cautious assumptions were made, and scenarios based on these assumptions were tested.

Likely receipts from a workplace parking levy will be approximately £95m over the first 10 years. This could attract match funding making a total investment pot of up to £450m.

The flexibility of the programme is an important characteristic of the workplace parking levy. Leicester will be able to respond to changed circumstances by actively managing the programme.

#### Managing the workplace parking levy investment programme

The Workplace Parking Levy Board will be responsible for managing the investment plan, including deciding on what projects should be included, at what level, and when funds should be provided, as well as day-to-day policies for operating the workplace parking levy.

The Board will ensure that projects are justified and value for money. This will make the workplace parking levy and investment programme much more resilient in times of difficulty, as well as allowing the council to provide match funding for grants as and when opportunities arise.

An Employer Transport Forum will input into the Workplace Parking Levy Board's decision making.

Annual reports will be published. At the end of the first 10-year programme, there will be a thorough review and a new set of priority projects will be developed.

Comments			

#### What happens next

#### View relevant information

During the 12-week consultation exercise we are inviting comments on the workplace parking levy business case in an online survey. Meetings will also be set up to allow further questions and comments to be received.

When this consultation exercise is complete, responses will be collated and included in a consultation report with council responses, which will be published and added to the business case package.

Leicester City Council intends to consider all the relevant business case information at a Full Council meeting in Spring 2022.

If approved, the package of business case documents will be submitted to the Secretary of State for transport for approval.

A workplace parking levy employer and parking survey with an associated information and engagement programme is proposed for spring/summer 2022.

A shadow period for workplace parking levy (without charging) is being considered for later in 2022 to put in place the necessary procedures to operate the workplace parking levy.

If approved by the Secretary of State, workplace parking levy charging is planned to start early in 2023.

Comments
What would you like to do now?
(Required) Please select only one item
Go back to the main menu
Go to end of consultation
Supporting documents
This page contains links to documents that were used to inform the proposed WPL for Leicester. Please use the text boxes below to comment on any of these document (please ensure you indicate which document / section you are referring to).
WPL Draft Scheme Order and Explanatory Notes <user_uploads wpl-order-and-explanatory-notes-1.pdf=""> Legal document that, if approved by the Secretary of State for Transport, will allow a WPL to be implemented in Leicester.</user_uploads>
Draft Leicester Transport Plan 2021-36 <user_uploads leicester-transport-plan-draft-2021-2036.pdf=""> Sets out the vision for transport in Leicester, including the priority projects proposed to be funded by WPL.</user_uploads>
Draft Leicester Transport Plan and Initial Workplace Parking Levy Consultation Report <user_uploads leicester-transport-plan-and-initial-workplace-parking-levy-consultation-report.pdf=""> Summary of comments made in the previous consultation in summer 2021 and the council's responses to the comments.</user_uploads>
Bus Services Improvement Plan <user_uploads leicester-bus-services-improvement-plan.pdf=""> Sets out detailed proposals for improving bus services over the next 10 years, proposed to be partly funded by WPL.</user_uploads>
Desktop Parking Analysis Report (Nottingham City Council) <user_uploads desktop-parking-analysis-reportpdf=""> Summarises the calculations used to estimate numbers of chargeable parking spaces in Leicester based on what has actually happened in Nottingham.</user_uploads>
Workplace Parking Levy: An evidence-based review of policy and prospects for Leicester (DMU) <user_uploads wpl-an-evidence-based-review-of-policy-and-prospects-for-leicester-pdf=""> Reviews the local charging options and considers whether WPL would be appropriate for Leicester.</user_uploads>
Workplace Parking Levy Economic Impact Study (DMU) <user_uploads workplace-parking-levy-economic-impact-studydmupdf=""> Looks at the impact of the proposed WPL on businesses, employees and the city as a whole.</user_uploads>
Workplace Parking Levy Traffic Modelling Report (AECOM Ltd) <user_uploads workplace-parking-levy-traffic-modelling-report.pdf=""> Summarises the technical traffic modelling exercise carried out to provide information on the likely impacts on traffic of the proposed WPL.</user_uploads>
Comment 1

Comment 2
Comment 3
Comment 4
Comment 5
What would you like to do now?
(Required)
Please select only one item  Go back to the main menu
Go to end of consultation

#### Equality monitoring

The information you provide in this final section of the questionnaire will be kept in accordance with terms of current Data Protection legislation and will only be used for the purpose of monitoring.

Your details will not be passed on to any other individual, organisation or group. Leicester City Council is the data controller for the information on this form for the purposes of current Data Protection legislation.

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Other (please specify)	Please select only one item  under 18  18 - 25  26 - 35  36 - 45  46 - 55  56 - 65  66+  Prefer not to say   Sexual orientation. Do you consider yourself to be  Please select only one item  Bisexual  Gay / lesbian  Heterosexual / straight
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	Please select only one item  under 18  18 - 25  26 - 35  36 - 45  46 - 55  56 - 65  66+  Prefer not to say   Sexual orientation. Do you consider yourself to be  Please select only one item  Bisexual  Gay / lesbian  Heterosexual / straight  Prefer not to say

#### Disability

Do you consider yourself to be a disabled person?

The Equality Act 2010 defines a person as disabled if they have a physical or mental impairment which has a substantial and long-term effect on their ability to carry out normal day-to-day activities and has lasted or is likely to last for at least 12 months. People with HIV, cancer, multiple sclerosis (MS) and severe disfigurement are also covered by the Equality Act.

Please select only one item
Yes
○ No
Prefer not to say
If you have answered 'Yes' to the above, please state the type of impairment that applies to you. People may experience more than one type of impairment, in which case you may need to tick more than one box. If none of the categories apply, please tick 'Other' and state the type of impairment.
Please select all that apply
A long standing illness or health condition such as cancer, HIV, diabetes, chronic heart disease, or epilepsy
A mental health difficulty, such as depression, schizophrenia or anxiety disorder
A physical impairment or mobility issues, such as difficulty using your arms or using a wheelchair or crutches
A social / communication impairment such as a speech and language impairment or Asperger's syndrome / other autistic
spectrum disorder
A specific learning difficulty or disability such as Down's syndrome, dyslexia, dyspraxia or AD(H)D
Blind or have a visual impairment uncorrected by glasses  Deaf or have a hearing impairment
An impairment, health condition or learning difference that is not listed above (specify if you wish)
Prefer not to say
Other
If Other, please say
How would you define your religion or belief?
Please select only one item
○ Atheist
○ Bahai
Buddhist
Christian
Hindu
☐ Jain
○ Jewish
Muslim
Sikh
No religion
Prefer not to say
Other
If Other, please specify

What is your sex?
Please select only one item
Female
Male
Prefer not to say
Is your gender identity the same as your sex registered at birth?
Please select only one item
Yes
○ No
Prefer not to say
If No, what term do you use to identify your gender? (leave blank if prefer not to say)

#### **Appendix B**

#### **Comments and LCC Responses**

This appendix lists all the main comments identified, grouped within the themes, and summarises the Council's response to the points made.

Table B1: Concept of WPL

Ref	Summary of Comments (Number of Comments)	Leicester City Council Response
C1	Unfairness (993)	
	Many respondents cited the 'unfairness' of WPL and described it as a stealth tax and unacceptable. Others also questioned why WPL should be paid on top of Business Rates or general vehicle taxes (e.g. road tax, fuel duty). Some thought that employee charges should not exist, and it should be made fair for everyone - many other jobs are of equal importance and value. It was cited that it was unfair to charge some employers, and exempt others.  Some respondents questioned why they had to pay	With regard to fairness of WPL also see responses in C2/C4.  WPL is a charge on employers not employees and it is up to employers if or how a charge is passed on to employees who park at the workplace. It is designed to target car use by commuters, who are some of the main contributors to congestion, poor air quality and carbon emissions in the city  WPL is a flat rate charge per space that does not take account of personal circumstances (e.g. time of travel, availability of public alternatives). However, employers can, if they wish, ensure that if a charge is passed on to employees using the car parking place, then it is as fair as is possible eg charging higher-paid people more and lower-paid less.
	the WPL when they would derive no benefit from the investment (e.g., public transport not suitable).	The proposed 100% discount for employers with 10 or fewer liable parking places was intended to support small business, to limit operational and enforcement complexity and to recognise that larger employers have by far the majority of liable parking places. Other 100% discounts reflect the nature of work undertaken e.g. emergency services.
		There are compelling reasons why employers can justifiably be charged. Congestion costs are greatest for businesses, and congestion in Leicester is largely caused by journeys to and from work by car. Good transport links are essential for business. Reducing congestion and improving public transport is strongly supported by large sections of the local business community because it will allow staff to travel efficiently to employment sites, and it will improve the efficiency of supply chains, improve access to markets and thus support business competitiveness. By supporting these objectives, the WPL package will secure Leicester's long term economic prosperity which will benefit businesses and employees alike.

		Whilst it is not realistic to expect that every person who pays the WPL would receive an equal benefit, the benefits from the "WPL package" (i.e. the charge itself and the public transport investment it supports) will be broadly spread. Even those who must continue to use a car will benefit from implementation of a Workplace Parking Levy scheme because of better managed congestion, reduced air pollution and reduced carbon emissions. This will also help the Council meet other targets, such as air quality and the Government's Decarbonisation agenda.
C2	The need for WPL (742)	
	Some respondents questioned the need for the scheme. It was thought that the proposed WPL scheme would not reduce congestion. Congestion was not seen as an issue at some workplaces. This was relevant to respondents who did not travel in the	If the Council is to meet challenging city-wide decarbonisation, air quality and health ambitions and targets, a radical approach to improving public transport, cycling and walking is needed. The business case proposed that a workplace parking charging mechanism directed at commuters was an appropriate solution.
	peak periods and are not contributors to congestion issues. Therefore, it was felt to be unfair that a levy would still be applicable	The decision to drive to work is influenced by free or relatively cheap workplace parking. Therefore, the Council proposed to implement a scheme that, by charging employers for workplace parking, will encourage them to better manage their workplace parking spaces and influence employee travel behaviour through the
	People who live outside of the city boundary would not see a direct benefit and would still have to use their	adoption of company travel plans and parking management policies.
	cars, so this would not reduce the number of cars on the road.	The Workplace Parking Levy scheme was proposed as part of a package of long- term measures to address growing congestion in Leicester as well as wider challenging Government ambitions/targets. Leicester City Council needs to take
	The concept of WPL is outdated - technology has now moved forward since Nottingham's scheme. Also the WPL ignores future working practices in light of the pandemic.	advantage of all opportunities to accelerate delivery of its transport programmes and WPL was identified as a potentially important part of this strategy that would provide benefits both during and outside of peak travel periods.
	pandemic.	The WPL would help to provide a well-connected, environmentally friendly and
	There was concern whether the scheme would deliver its stated benefits whilst a small number of respondents did not believe that the scheme would generate the stated amount of revenue. It was also cited that funding from the levy would not be used for transport improvements.	affordable city-wide bus, cycling and walking network. This would also help to maintain Leicester's position as an attractive location for businesses and promote sustained long-term economic vitality. Every walking or cycling improvement, and every behavioural change initiative or new electric bus will have a positive impact, both on the numbers of people transferring to sustainable modes and on the general improvement of the city as a better and cleaner place to live. The projects will be
	23	cumulative, in that, for example, partial cycle infrastructure improvements will

		eventually become a comprehensive city-wide network, small-scale behaviour change initiatives will be stepped up, and alternative fuels will mean that air quality will be improved, all working together to make cycling much easier, safer and heathier for many more people.  There is a proposed new city-wide express electric 'Greenlines' subsidised bus network linking park and ride sites, the city centre and other major employment, shopping, leisure and hospital sites.  New technology can be used to support a WPL scheme – for example employees could use a pre-trip application to book a parking space or buy a bus ticket and employers can use improved access controls to prevent abuse of car parks. The impact of Covid was built into the business case for WPL.  The estimated revenue and impact figures are derived from the best information available at the time of writing the Business Case. WPL revenue would be ringfenced by law for agreed transport priorities in the draft Leicester Transport Plan.  It is important to remember that those who have to use a car will also benefit from a WPL scheme through better managed congestion, improved air quality and reduced
C3	Support for positive responses benefits of WPL (325)	carbon emissions.
03	There are too many cars on our roads and the scheme is needed for environmental reasons and to reduce carbon emissions. It is a practical and affordable way of improving public transport and active travel in Leicester.	Leicester City Council has noted and welcomes the supportive comments received regarding the environmental and social benefits of a WPL.
	WPL for Leicester has the potential to lead the way on global environmental challenges.	
	Implementing WPL is urgent. The benefits from the scheme will be felt by all living in Leicester. The scheme would reduce inequality, particularly for	

	harrachalda wha aganat affarra a walaisia a a a a a a a	
	households who cannot afford a vehicle and are	
_	vulnerable to air pollution.	
C4	Supportive of reducing cars, but not WPL (238)	
	There were a number of respondents who supported the concept of a 'green transport strategy' to reduce car use but did not agree with a WPL scheme proposal. Reasons cited included issues of equity and 'fairness' of the scheme, additional tax on businesses, particularly in the current economic climate and work premises that are owned privately, and the Council should not be allowed jurisdiction on charges over private property. It was cited that it unfairly penalises those who have no choice but to drive and / or already to have pay for parking at their work premises.	Employers have a role to play in helping to managing city wide challenges such as congestion, air quality and carbon emissions. Providing free workplace parking places does not contribute positively to these challenges or encourage employees to opt for healthier, more sustainable travel options. WPL creates an incentive for employers to reduce free parking places, to encourage employees to use more sustainable forms of traffic and potentially to re-use car parking areas that are no longer needed for other more beneficial uses. In addition, funds raised via WPL will be directly invested in improving the transport network and make use of feedback from employers and employees to ensure specific access needs for businesses are considered.  The WPL business case took into account considerations of fairness and equity and sought to apply WPL to all employers. The discounts/exemptions and charge level were also considered in this regard and these were considered proportionate.  The Transport Act 2000 gives Council officers the powers to enter private property for the purpose of enforcing an approved WPL scheme.  WPL is a charge on employers not employees and it is up to employers if, or how a charge is passed on to employees who park at the workplace.
C5	Environmental responses (222)	
	There were very few responses relating to environment. It was noted that a WPL it will reduce air pollution and congestion in the city	A Strategic Environment Assessment undertaken to support the draft Leicester Transport Plan considered that overall, the LTP4 strategies will result in significant positive social effects in terms of protecting and promoting everybody's safety and their physical and mental wellbeing, and in terms of improving air quality. Further environmental impact assessment may be required as relevant projects in the LTP are brought forward as part of the WPL investment programme.
C6	Questioned consultation information and process	(171)

The content of the consultation documents was questioned.

It is not a balanced document, WPL has not reduced congestion or car use in Nottingham. It was also queried whether there should be such reliance to the Nottingham scheme as evidence as it is irrelevant; it was ten years ago, there was no cost of living crisis and 'better' infrastructure was being delivered.

The Business Case does not address the risk of the effect on school budgets or the potential negative impact on the education of students.

Engaging with the consultation was difficult and was thought to put many people off.

Some respondents were not aware of previous consultations already undertaken for WPL.

The WPL Business Case follows Government guidance as much as possible. It is intended to describe and justify the proposals in detail, and to assess costs and benefits of a WPL scheme.

The consultation was considered to be extensive and carried out in the normal way using online information and press releases/social media as well as a series of meetings and other events. The reach of consultation was greatly extended by using remote meeting platforms such as 'Teams'.

The Council has commissioned studies on the applicability of WPL to Leicester and economic impact. A modelling exercise predicted WPL traffic impacts in Leicester. As well as this, Leicester has been able to look at actual impacts of WPL in Nottingham, both in the form of academic reports and from the experience of Council officers.

The traffic modelling undertaken (via the Leicester Pan Regional Transport Model) uses forecasting methodologies that are based on established techniques to consider the changes in travel demand patterns. The Council considers that this is an appropriate tool for assessment.

Key stakeholders have already commented on the WPL proposals as part of the formal consultation for the Leicester Transport Plan and informal consultation on the principles of WPL held in summer 2021.

The Council indicated its commitment to working alongside schools to develop strategies to manage WPL and to consider approaches to implement fair WPL charging should it be implemented

Informal engagement has continued throughout the COVID-19 pandemic with many virtual meetings with, for example, the East Midlands Chamber of Commerce, the Federation of Small Businesses and Climate Action Leicester. The City Mayor also hosted Twitter question and answer sessions on WPL. Initial responses have been positive on the LTP transport vision, but with a variety of views on the WPL proposal.

		An Equality Impact Assessment was carried out as part of the WPL development process and would be reviewed on an ongoing basis. following the consultation to ensure characteristics are reflected appropriately. The general comment that WPL will have a negative impact on women is not agreed as there are complex interactions in transport – for example WPL will enable a much-improved public transport system and women tend to use public transport more than men.  The consultation was carried out in the normal way using online information and press releases/social media as well as a series of meetings and other events.
C7	Displaced parking (166)	A displaced parking programme is used being developed is inthe with the Country
	Displaced parking concerns was the main area of comments.  The WPL scheme would cause an increase in displaced commuter parking into residential areas as individuals seek to avoid paying the charge.  There will there be a need for more Residential Parking Permits	A displaced parking programme is was being developed jointly with the County Council and adjoining councils. It may be possible to park on nearby residential streets near workplaces where employees are charged for using workplace car parking places, and this possibility has been highlighted by Leicestershire County Council. This already happens to a certain degree, and there are established parking controls that can be extended if this happens in the future due to WPL. Nottingham City Council has considerable experience of this, and officers have advised on the development of a displaced parking strategy which will focus on residential areas within 800m radius of large employers.  Previous experience of Residential Parking Zones has shown them to have a significant impact on parking issues in an area, but implementation will always be subject to extensive consultation with local residents.
C8	Raising revenue (145)	
	WPL is merely a mechanism to raise revenue for the Council, irrespective of congestion and is an extra cost to businesses.  The revenue raised will not be spent on the improvements set out within the Business Case.  The Council already receives funding from Central Government to implement such transport infrastructure schemes, so why is a WPL needed?	See responses in C2  The WPL scheme is not simply intended to raise revenue – it also has a demand management aspect. It directly targets those who contribute towards congestion, poor air quality and carbon emissions in Leicester, and encourages them to switch to alternative modes of transport, possibly funded by the revenues generated by the WPL scheme. It should also be noted that the Transport Act 2000 requires that revenue generated by the Levy must be ring-fenced for spending on transport measures that meet the objectives of the draft Leicester Transport Plan.

	A clear plan was needed to fund the infrastructure.	The council does receive transport grants from the Government but these are secured usually on a competitive basis and are sporadic in nature. The WPL would provide a regular ongoing source of match funding allowing the council's transport vision to be delivered in full to an agreed programme. WPL funds have been used successfully in Nottingham as match funding to secure additional Government funds.  A critical success factor for the proposed WPL scheme is financial efficiency - the most efficient manner of managing and making use of WPL receipts, maximising funding from other sources, and using WPL receipts to lever in grant and other funding to create a WPL investment programme.  The draft Leicester Transport Plan sets out a clear plan for transport improvements in the city, and the draft WPL Investment Programme is summarised in the Introduction to this report and provided in full in the WPL Business Case (5.7, p63)
C9	Only Nottingham has implemented a WPL (126)	(on, poo)
	Only one other local authority who has implemented a scheme since 2012 and 'clearly there is a reason for this'. It was also suggested that the Council works with other cities to develop other ideas to fund local transport improvements, rather than to lead the way.	Alternatives to WPL are considered in the WPL Business Case.  Leicester City Council has closely examined the WPL scheme in Nottingham to consider if it is an appropriate scheme for Leicester. Evidence was obtained by Nottingham City Council through their experience of developing and operating the levy and through academic research, mostly from Loughborough and De Montfort Universities.  Several other local authorities nationwide are now also expressing an interest in pursuing a WPL scheme.
C10	Other ways of funding (87)	

There are other ways of funding the Plan, not through WPL funding offers reliable long-term local funding which can be matched with charging employers, such as: Government funds when they are available. At present Leicester suffers in national competitions for funding by not being able to put forward the required local Directly from the government. contribution. See response to C8. • The Council to give incentives for people to purchase electric cars to help meet Incentives for buying electric cars should be done at a national scale to deliver an Government air quality / carbon reduction appropriate comprehensive approach. It should be noted that a 1:1 switch to electric targets. vehicles will not improve congestion, will continue to provide a level of transport • the bus companies should be paying for the pollution, and will continue to require residents to purchase and own a vehicle for improved infrastructure transport needs. Charging for on-street parking Should focus tackling the 'school run' problems Leicester City Council has entered into an Enhanced Partnership with bus companies instead as this would address the school related traffic which includes significant financial contributions from the bus companies to agreed problems improvements to their services alongside infrastructure improvements from the council. The City Council regularly reviews on-street parking charges and locations to ensure it caters to those that require vehicular access, such as disabled users. The City Council fully supports the 'school run' measures and is already working in partnership with schools and local residents to implement "school streets" and other measures. Such programmes can and will continue independently of the WPL, but seek to achieve much the same goal of reducing the incentive to travel by car and providing alternative. better supported options Other forms of congestion charging / road pricing (81) C11 The Business Case considers other funding options to deliver against the A Road User Charging scheme was suggested as an alternative by many respondents and some asked if a Government's ambitions (2.11, p25). This included Road User Charging, public comparison between WPL and Road User Charging funding, increasing business rates and parking charges. It was concluded that WPL is most appropriate for Leicester as it contributes to the delivery of LTP objectives scheme had been undertaken. and provides funding for the selected priority projects in the first 10 years of Road User Charging was generally thought to be a operation. WPL can be implemented promptly, would follow on seamlessly from the fairer system as it is based on a 'pay as you use TCF projects already under way, and would help to facilitate the Enhanced Bus model'. This would really deliver the sustainable Partnership proposals. Elements of all these programmes are already being transport policy. Though it might also discourage visitors and shoppers and therefore impact on city centre businesses.

Other forms of charging were also suggested, such as a Clean Air Zone and congestion charging zone (like London)

delivered which demonstrates to employers and residents what can be done and what impacts there could be with a long-term programme of similar initiatives.

Congestion patterns around the city are heavily correlated to travel to work; existing alternative transport networks are best placed to accommodate modal changes at these times e.g. in terms of frequencies of bus services. The overall Leicester Transport Plan strategy is to improve these alternatives to offer better transport choices.

Table B2: Economy / Business Impacts. Total number of comments: 624

Ref	<b>Summary of Comments (Number of Comments)</b>	Leicester City Council Response
EB1	Negative business impacts / concerns (566)	
	Leicester city centre will become a 'ghost town', with a departure of businesses relocating to outside of the WPL charge area along with a reduction in footfall. WPL will have a detrimental financial impact on existing businesses.  There will be recruitment and staff retention implications and impact on local employer competitiveness. It was thought it would discourage people from wanting to work in low paid jobs in Leicester.	The council has commissioned a study into the economic impacts of WPL in Leicester, which has fed into the Business Case (3.3, p28). It is the Council's view, supported by these economic studies and the experience of Nottingham, that WPL would not have any significant adverse effect on the economy of the city centre or the city as a whole. The benefits of greatly improved public transport and cycling and walking networks are considered to be positive for the local economy.  The experience from Nottingham does not indicate a departure of employers from the city nor has WPL caused any significant adverse economic impact on the city over the 10 years of operation; on the contrary, an academic evaluation of the Nottingham WPL scheme concluded that the investment in public transport infrastructure made possible by WPL is proving an attractor to business to locate to or relocate within the Nottingham City area.
		Businesses would benefit from better managed traffic congestion that could reduce their operating costs. Business will also benefit from improved accessibility, providing access to a larger pool of employees, thus increasing the recruitment potential and skill set of an organisation's workforce.  Many low paid workers already use public and active transport for their commute and the WPL would fund improvements that benefit all bus users, cycle commuters

		and pedestrians. WPL also offers employers an opportunity to better manage their car parking leading to improved efficiency and staff satisfaction.
		Employers would be able to either fully or partly fund WPL themselves, or design their employee recharging approach in a fair way, for example taking into account low paid and higher paid employees.
EB2	Less inward investment (33)	
	Local businesses will curtail their future investment plans within the city and the city would not be seen as an attractive location to invest in compared to other cities without a WPL	An Economic Impact Assessment has been carried out for the proposed Leicester WPL scheme. Results and the Council's responses are shown in the Business Case (3.3, p28). This has fed into the scheme design. The scheme would be applied equitably across the public, private and voluntary sectors, all of which will benefit from the investments made in transport. There is no evidence of significant adverse impact in this regard from the Nottingham scheme. As noted in the response to EB1 above.
EB3	Positive responses concerning economic benefits	(25)
	Respondents detailed specific reasons or areas they were in support of that would benefit Leicester.	Noted

Table B3: Socio-Economic Impacts. Total number of comments: 2,479

Ref	Summary of Comments (Number of Comments)	Leicester City Council Response
SE1	Low paid workers - including household income (865)	
	There were a number of concerns from low-income workers that WPL is unfair. In some cases, if the levy is applied to them, it would mean that some employees earn less than the minimum wage.	The WPL applies to employers in the first instance who then have the ability to fund it fully or partly themselves or design their employee recharging approach in a fair way, for example taking into account low paid and higher paid employees.  An Economic Impact Assessment has been carried out for the proposed Leicester WPL scheme and this considers impacts on employees. This has fed into the scheme design (see Business Case 3.3, p28).
		There is an equity consideration as many employees do not have access to a private vehicle and have to commute using public transport and/or active travel. This type of travel is sustainable and does not contribute to congestion or poor air quality in the same way that car commuters do.

		To mitigate adverse impacts on lower paid employees, the Council would:  a. provide advice and guidance to employers to help them develop company travel plans and parking policies which will benefit employees.  b. apply a small employer discount which will capture a large proportion of the identified low-wage sectors in Leicester. Many businesses will not have to pay the levy because of this discount.  c. deliver the Leicester Enhanced Bus Partnership Plan which includes
		consideration of improved bus services, discounted fares, and ticketing improvements.
SE2	Cost of Living (734)	
	There were many respondents who were very concerned with the increasing cost of living with a proposed WPL, particularly with the impact on employees' families.	The Council is mindful of the pressures on residents given the cost of living crisis and is aware of the uncertainty and concern that may be felt at this time.  The WPL only applies to employers, and it is up to employers whether or not to pass a charge on to employees using workplace parking. However, there are ways in which employers can help mitigate impacts. Each eligible parking place would be subject to the annual charge, but this does not mean the full cost would necessarily have to be borne by an individual employee. Where employers decide to pass on some or all of the charge they could develop a car park management policy that takes account of the different needs of their employees. Advice and guidance would be made available to employers to help them develop company travel plans and parking policies which benefit employees.  See response at SE1 and SE3.
SE3	Childcare / personal family commitments (323)	See response at SET and SES.
	Use of a personal vehicle is required for childcare / other family commitments as public transport or other alternative modes are not suitable.	Noted. It is understood that public transport and active travel options are not suitable for everyone. There are ways in which employers can help mitigate impacts. For example, employers could develop a parking policy that takes account of low income and part-time workers or those with childcare responsibilities. Advice would be made available to employers to help them develop company travel plans and parking policies that benefit employees.
SE4	Health (unable to use Public Transport and alternative	modes)/negative impact on health and wellbeing (178)
	Potential negative impact on health and wellbeing due to added costs.	See response at SE2, 3 and 5

	Those who have a disability but do not qualify as medically disabled were unhappy about potentially being charged for the scheme.  Due to the physical nature of some jobs, it was commented that using active travel at the end of a night shift was not practical and current public transport options were not sufficient.	It is recognised that there will inevitably be a group of employees with issues relating to healthcare, mobility, physical, or mental health (temporary or long term) who would not qualify as medically disabled. As part of the implementation of the WPL, advice and guidance would be made available to employers to help them develop company travel plans and parking policies which benefit employees including vulnerable groups.  The bus service improvement proposals include more frequent, early morning and later services, as well as better services on Sundays. Proposals for "flexi-lines" services to supplement main bus services would benefit those who cannot use/access traditional public transport.  It is accepted that not all current car users will change to alternative modes. Those that still have to use cars will benefit from better managed congestion, easier parking
SE5	Equality / Dissolition (142)	and a cleaner environment.
SES	Equality / Disabilities (142)  Some respondents thought that disabled employees	The WPL scheme makes specific provision for a 100% discount for places occupied
	would be charged.	by vehicles used by Blue Badge holders, enabling those registered disabled who use a car to continue to do so at no additional cost.
	Other impacts on equalities - as most face-to-face jobs are undertaken by women and therefore unable to benefit from working from home.	See response at SE3
		It is understood that many lower paid workers do not have the benefit of working from home. However, WPL is charged to employers not employees and it would be possible for the employer to charge the levy on in a way that recognises differential pay levels.
		The Council has undertaken an Equalities Impact Assessment as part of the scheme.
SE6	Positive responses concerning social and economic	benefits (35)
	Comments were noted regarding the positive social and economic effects of the WPL	Noted.

Table B4: Use of Revenue / Proposed Investment Programme: Total number of comments: 802

Ref	Summary of Comments (Number of Comments)	Leicester City Council Response
RP1	Concerns (520)	
	Leicester does not have the same offer as Nottingham's WPL investment programme. Leicester's proposals need to have a 'WOW' factor to give the city that competitive edge.	The council's vision includes a transformed city-wide bus system; world class city-wide walking and cycle infrastructure; liveable neighbourhoods and smart technology. This is different from the Nottingham WPL which largely focussed on funding a fixed tram system benefitting specific parts of the city.
	Additional cycle lanes can create further congestion. It was questioned whether further provision is needed given their perceived limited use. There is a lack of justification to spend on further development of the cycling network.  WPL investment proposals would benefit the city centre at the expense of the periphery and some respondents would not get a direct benefit from it.  There was very little support for the levy to be used for railway station improvements as it was thought it does not create a modal shift.	It was concluded that a fixed tram system is not right for Leicester. It is too expensive to procure, introduce, and operate and too fixed in nature. A high-quality electric tramlike bus is more flexible and responsive. A big challenge is to make it mainstream for commuters and others. This is linked to quality – ensuring that the buses are fast and frequent, reliable, and comfortable.  A comprehensive and effective cycle network will attract users away from cars and therefore reduce overall demand on the network.  A contribution to the rail station is proposed in the later period of the first 10-year investment plan, building on the first phase rail station improvements that will be carried out using the Government's Levelling Up funding. The improvement of the rail station has a target of 33% more passengers, and many will be transferring from cars. This includes longer distance commuters and those travelling for pleasure or social purposes.
RP2	Additional areas for using the funding (157)	
	Further suggestions for additional areas of funding include:  Creation of safe cycling routes linked to schools and universities and other large employers. Also the expansion of the bike share scheme, to include training on how to use the bikes.	The comments are noted and can be considered further as potential amendments to a WPL investment programme, noting that the projects listed in the introduction to this report are those intended for the first 10-year plan. Other projects may be included at later stages.  Whilst tram and other light rail services have benefits and are known to work in cities across the globe, in the immediate future the decision has been made to focus on a transformation of bus services in the city.
		See RP1 above regarding tram proposals

	Investment outside of the city to allow disused railways to be opened up to reintroduce metro rail into the city	
	Cheaper /free local bus travel. The cost of a flexi ticket to be reduced to match or below WPL parking space as some commuters need to take two bus services. The provision of free bus passes to other groups such as people on benefits and young people under 21	
	Improving connectivity by public transport into the county area and orbital services within the city.	
	Electric vehicle charging points to encouraging a shift towards more sustainable forms of transport.	
	Focus funding in deprived areas.	
	Support for CCTV and improved lighting to support walking outside of core business activity.	
	Think long term about a tram / light rail to improve the attractiveness of the city,	
RP3	Positive support for improvements to bus services	and Active Travel, cycling and walking (125)
	There was support for more buses and for them to be	Noted
	made more attractive than the car, and	
	for the proposed active travel improvements.	

Table B5: Public and Active Transport. Total number of comments: 2,721

Ref	<b>Summary of Comments (Number of Comments)</b>	Leicester City Council Response
PT1	Poor public transport options (including journey time	/ reliability) (1693)
	Poor transport options currently available, journey	The Council agrees that public transport needs substantial investment to bring about
	time and reliability make travel difficult.	the transformation set out in the council's transport plan and bus strategies. A WPL

The Greenlines Bus Network proposals (a network of five Greenline express routes aimed at wider area commuting) form part of the Leicester Enhanced Bus Partnership Plan (2022-2030). An electric outer orbital service is due to
Scheme with all local bus operators. This sets out a range of commitments by all partners to be delivered between 2022 to 2025. All partners are actively seeking further funds to expand the Scheme to deliver more aspects of the Leicester Transport Plan over the future years. WPL would contribute to this.
It is not being proposed that all current car users will change the way they travel.  Those that still have to use cars will benefit from reduced congestion, easier parking and a cleaner environment.
It is not being proposed that all current car users will change the way they travel. Those that still have to use cars will benefit from reduced congestion, easier parking and a cleaner environment.

	far. Road maintenance of cycle lanes needs attention to encourage uptake.	The council is committed to, and underway with delivering an extensive network of high-quality safe cycle routes, fully segregated where possible, to support cycling and its benefits to health and the environment. This is complemented by ongoing behavioural change and cycle training programmes and by 20mph and SSHN (Safe Sustainable and Healthy Neighbourhoods) projects, which aim to reduce and calm traffic in residential areas and local centres, as well as working with the County and District Councils to continue work on important routes beyond the city boundary
DT2	Coat (102)	The need for continued cycle maintenance on the cycle lanes is accepted.
PT3	Bus fares are more expensive than the private car.	The City Council has now entered into a legal Enhanced Bus Partnership Scheme with all local bus operators. This sets out a range of commitments by all partners to be delivered between 2022 to 2025 that outlines plans for targeted discounts over the next three years. The partnership is considering fares and possible discounts that could be funded by WPL.  Leicester has recently introduced multi-operator capped fare contactless bus ticketing, the first in a UK city outside London.  The full cost of motoring needs to be taken into account when comparing with bus services, including environmental costs for example.
PT4	Safety of public transport/ walking and cycling (152)	
	<ul> <li>The main responses were focussed around:</li> <li>Using public transport during a pandemic</li> <li>Using public transport (including walking to bus stops) late at night</li> <li>Perceived safety of cycle lanes</li> </ul>	There is a perception that using buses can be unsafe. Whilst actual crime levels do not support this perception, it is nevertheless important to work to allay this fear. Public transport also suffered during the pandemic, but passengers are gradually returning.  The council recognises that more needs to be done to ensure people feel confident to cycle as a preferred transport choice. The aim is to provide safe and attractive cycling and walking routes linking the achievements of our Connecting Leicester and Transforming Cities programmes to local centres and neighbourhoods  Potential cycling and walking initiatives to address health and safety such as the provision of CCTV and further street lighting could be considered for WPL funding.
PT5	Positive responses supporting sustainable travel	(114)

	The positive responses centred around support for sustainable transport, which is required to meet the Leicester Transport Plan objectives.	Noted
PT6	Other (107)	
	Public transport needs to be under the City Council control to deliver the changes needed as it was thought that bus operators focus is profits.	The City Council has entered into a legal Enhanced Bus Partnership Scheme with all local bus operators. This sets out a range of commitments by all partners to be delivered between 2022 to 2025. A number of projects have and are being delivered linked to the partnership which are set out on the Leicester Bus Partnership website (www.leicesterbuses.co.uk). All partners are actively seeking further funds to expand the Scheme to deliver more aspects of the Plan over the future years. WPL funds would be used to support the partnership and the delivery of Schemes.
	It was also questioned will the public transport network have the capacity for the additional demand from a shift from cars to sustainable forms of transport.	The partnership work with bus operators has shown that there is capacity within the existing and proposed bus network.  There is also capacity within our existing P&R sites which provide an opportunity for growth. Our strategy is to improve both the sites themselves and the bus services serving them and therefore increase their attractiveness for longer-distance car drivers. A new P&R site has been implemented at the General Hospital site.
PT7	Rail (60)	
	Investment in rail should not be prioritised at Leicester railway station as it was questioned whether it was needed.  Better suburban rail services are needed.	Rail investment is not prioritised over other modes of transport. A contribution to the station is allowed for at the end of the first 10-year investment plan. The station transformation currently committed through the recently secured Levelling Up funds will include greatly improved facilities for passengers, rail service improvements as well as converting the 'porte cochere' for commercial uses and creating a new public square and entrance to the station. Plans have been developed with rail industry partners.
		The Council supports further work on suburban rail options and will work with regional partners in this regard.

Table B6: WPL Scheme Details. Total number of comments: 2,716

Ref	<b>Summary of Comments (Number of Comments)</b>	Leicester City Council Response
SD1	Discounts and Exemptions (866)	

It was challenged whether school staff should pay as they do not work 52 weeks per year, but rather 38 weeks. Schools are not businesses so it was felt they should be exempt.

It was questioned why smaller businesses with ten or less car parking spaces should receive a discount. One respondent suggested that five free spaces is more reasonable.

Respondents wanted a discount for electric vehicles, which would encourage ownership to reduce emissions and a shift to zero emission vehicles. Although there were comments agreeing with the exemption due to a contributor to congestion.

Motorbikes still add to pollution, compared to electric vehicles, although there were a few responses in support as they do not occupy as much space on the road.

Car sharers to be exempt or discounted.

Low paid employees should be exempt, or a discount applied.

There were a number of respondents who were unclear whether employees registered as disabled would be exempt or assumed that the levy would apply to them.

The public sector should be exempt as it is placing another cost / tax on the public sector.

Exemptions and discounts were carefully considered, and options are set out in the WPL Business Case. (4.4, p49)

All organisations with chargeable spaces that are not subject to exemptions/discounts would be charged the fixed rate. Only occupied liable workplace parking places are charged.

#### Education

Staff who commute to schools contribute to peak period congestion and the associated negative environmental impacts. The Council would work closely with schools to develop management strategies for WPL, including what transport options would be needed to support teachers and support staff in their journeys to and from work. Employers can choose to recharge employers with differing work patterns accordingly.

#### Small Employer Discount

The Small Employer Discount means that stand-alone employers with 10 or fewer liable parking places would not have to pay the levy. This is intended to support small businesses and recognises that the majority of liable parking is in larger workplaces. The figure of 10 liable parking spaces is considered to represent a reasonable balance between the need to charge fairly and to support the growth of the economy.

### **Electric Vehicles**

The proposed discounts and exemptions were carefully considered. The conclusion on electric vehicles was that any discount or exemption would be relevant for only a temporary period during the take up of EVs. . As has additionally been noted, electric vehicles do not contribute to a reduction in congestion and continue to create some localised air quality issues.

### **Motorbikes**

It can be argued that motorbikes provide a step towards more sustainable alternatives, especially if they are electric.

# Car Sharers

Key workers should be exempt or have a discount applied. It is felt that the temporary NHS discount is unfair, and their role deemed to be less important to other key workers in the NHS who benefit from this incentive.

Charities should be entitled to a discount or exemption. It was stated that these organisations are working for the benefit of people in Leicester.

It was questioned why the NHS had been given 50% reduction, as there was not a recruitment crisis within this sector, unlike education. However, there was also support for this proposal as it was viewed that the health sector should pay the levy and to reconsider the 50% discount to the 100% permanent discount list.

Staff who provide the public transport (early morning/late evening shifts) should be exempt or receive a discount as there were very limited alternatives of transport available. This also applied to employees who worked unsociable hours / shift work.

Businesses that require employees to have cars to do their jobs should be included in the exemptions or discount list.

There is a built-in incentive for car share as only occupied workplace parking places are charged. If there are fewer commuter cars in the workplace car park, the WPL charge on employers is reduced.

#### Low paid

The WPL charge is made on the employer. The employer will decide how much of this, if any, is passed onto the employee using the car park and would have discretion to charge differentially depending on salary level Advice could be offered on how to do this fairly.

#### **Disability**

Workplace Parking Places used by Blue Badge holders receive a 100% discount, and therefore no charge is levied.

#### Public Sector and Key Workers

It would not be equitable to just charge private sector employers. Staff who work in the public sector such as schools generate traffic and this needs to be managed under the WPL. The WPL charge is made on the employer and the employer can, if they wish, differentiate between key workers and others when passing on a charge to employees using their car park.

### Charities and Volunteers

Volunteers would be exempt, which reflects their unpaid nature and to encourage volunteering, but parking places at charities used by paid staff would still remain liable if they do not fall within the small employer discount. This is to ensure equity between employers.

# NHS sites

Although Nottingham provides a 100% discount for qualifying NHS workplaces, LCC, considered that in the interests of fairness, all employers should be treated equitably. In the context of the challenges of Covid 19 and the parking concessions that were made by Government at that time, together with a planned wholesale estate reorganisation, a 50% initial discount was proposed. This would need to be reviewed in the current context.

		Employees who require vehicles for their work The WPL is charged to the employer not the employee. It would be possible for employers who have staff working early or late to recognise this if they decide to pass the charge on to employees using the car park. It is not expected that all car commuters will change their form of transport and those who need to use a car will also benefit from easier to access car parks, less congested roads and a cleaner environment.  The WPL charges the employer on liable spaces over a 24 hour day, during which a number of employees would use one space. The Council would work with employers who wish to pass on the charge to do it equitably, so these drivers are not unduly penalised by being charged the entire space levy rate.
SD2	Cost of the Scheme (625)	, , , , , , , , , , , , , , , , , , , ,
	The levy charge is too expensive, especially for those on minimum wage. It was also noted that it was	See responses to C1 and SE1.
	higher that Nottingham's WPL charge.	An analysis of how the proposed charge was selected can be found in the Business
		Case (4.3, p43). The proposed charge is approximately equivalent to no more than
	Other comments included that the Plan does not	a typical single daily bus fare or a Park and Ride monthly ticket, so represents a fair
	address a tiered price for those who do not travel into the city every day due to hybrid working or use the	charge to commuters if passed on to them.
	car park for a defined number of weeks per year.	WPL is only charged on occupied liable workplace parking places so does take
	car paint of a dominou flambor of theorie per years	account of those who are part-time or who only use a parking space occasionally.
	A few comments suggested a higher charge.	
		Transport modelling testing of a higher charge concluded that there are greater
		beneficial traffic impacts with a higher WPL charge, as more commuters would be
		attracted to other modes of transport. A greater move to sustainable transport is a key objective for the WPL and the Leicester Transport Plan, as it contributes to
		better air quality, fewer carbon emissions as well as reducing congestion. However,
		the additional impacts are relatively small, and it is the view of the Council that these
		extra benefits do not justify a higher charge level.
SD3	Concerns from county residents (431)	
	Concerns focused on investment being directed to	The 'Greenlines' network includes proposals for improved services right across
	the city and not to the county area. It was felt that there was no other option but to use the private car	urban Leicester and reaching wider afield via expanded park and ride provision.  Associated features to ensure attractiveness, such as bus priority, waiting
	when located outside of the city boundary.	infrastructure, digital ticketing and real time information provision are included.
	whom located outside of the oity boundary.	immusication, digital tionoung and real time immunity provision are included.

	Residents may also suffer from displaced parking	Residents from outside the city can use the improved and extended Park and Ride sites if they do not have other options.
		See responses in C4 regarding displaced parking. This is explained further in the Business Case (3.6.6, p41)
SD4	Further discount / exemption options / operation	of the scheme (167)
	Scheme charge to be in proportion to employee's salary.	The WPL charge is made on the employer in the first instance. The employer will decide if any charge is to be passed onto employees using workplace parking places. It would be possible for example to charge higher paid car commuters more
	If an employee paid the levy, would it guarantee a parking space?	and lower paid less.
		The WPL scheme itself does not guarantee a parking place, but an employer could
	Why has the duration of the scheme been set as indefinite?	make arrangements to do this.
		The scheme has been set as an indefinite period to offer maximum flexibility.
	Peak hours only to address the congestion as some employees do not travel during peak times.	It is considered that a scheme that is operational 24 hours a day and seven days a week is appropriate as this reflects the overall focus to reduce reliance on car use
	There were some comments that questioned whether if the levy would be passed to the employee, would the employee still be charged if they do not use the space.	and on transport and infrastructure to deliver air quality improvements. Workplaces may choose to ration their spaces on set rotas or times within this period in a way that suits their staff and any applicable shift patterns.
	It was unclear whether the Council would pass the Levy onto local authority maintained schools and whether the school management would make a decision if /how the cost would be passed onto the	The levy only applies to employers and to parking places occupied by commuters and certain other groups so unoccupied places are not counted for levy purposes. The Council will provide advice to employers on how to pass a charge on fairly if they wish to do this.
	employee.	The City Council would need to have further discussions in association with relevant partners including Trade Unions, work with schools on management strategies for
	A few respondents suggested the WPL scheme should include other premises, not just businesses,	
	for example supermarkets.	The Council cannot impose a levy for customer parking in a supermarket as there is no legal provision for this.

SD5	Transport infrastructure investment needed first	before implementation of WPL (160)
000	The proposed transport infrastructure investment	The Nottingham WPL scheme provided the local contribution to Lines 2 and 3 of
	should be implemented first, before the WPL	the tram network, which were brought into operation 3 years after the start of the
	commences. Some respondents thought that this	WPL in 2012.
	was the case for Nottingham (with the tram	
	implemented first ahead of the WPL). Without	There is £100m of transport investment underway or has recently been completed
	significant improvements to public transport network,	through the Connecting Leicester and Transforming Cities programmes. This has
	the idea of a WPL cannot be supported.	included extensive new high-quality cycling and walking infrastructure, focussed in
		and around the city centre, and a dramatic improvement in the public realm
		through revitalised streets and award-winning public squares and spaces. This
		programme has also funded significant improvements to the bus network/operation. This current large-scale investment in transport demonstrates
		to Leicester employers and residents how alternatives to the car can be improved
		if further funding can be made available.
SD6	Positive responses supporting sustainable transport	(134)
	Responses included that people need to be	Noted
	encouraged to use sustainable transport and there	
	needs to be a reduction in car use.	
SD7	Timing of implementation of the scheme (131)	
	There were concerns with the timing of the scheme,	The council appreciates the concerns felt by many residents given the national cost
	given the current cost of living crisis, businesses now	of living crisis, and this will be a consideration in any decision taken regarding the
	emerging from the Covid 19 pandemic who have	WPL
	already suffered financially.	
	Given the high increases in fuel, it is also an	Agreed that higher fuel prices can offer an opportunity to drivers to try other forms
	opportunity to encourage active travel / car sharing /	of transport. It must again be noted that the WPL will allow further investment in
	using public transport to reduce personal motoring	these alternatives to make them more viable for journeys across the city.
	costs.	and anomalive to make them more viable for journeys deress the sky.
SD8	Comments relating to the boundary of the charging	zone (79)
	The charging zone was unfair citing their workplace	Congestion occurs throughout Leicester and not just in the city centre. There is a
	is on the outskirts of the city boundary and employees	need to invest in improved transport across this wider area. The transport schemes
	do not travel into the city centre where congestion is	to be funded by the WPL scheme will serve peripheral areas including employment,
	at its highest. There were also responses in support	education and health sites.
	of a WPL for the whole city.	

	Some respondents suggested that the charging zone should start at the city centre and move outwards, over time once more transport infrastructure is in place or is confirmed within the area covered by the A594.	The WPL has been designed as a city-wide scheme to ensure that application of the levy is fair and does not discriminate against any location within the city. The revenues raised by the levy will fund public and active transport that benefits everyone, including those who don't use it, by helping to take car trips off roads and improving journey times throughout the city.
		The WPL Business Case states that it would be most beneficial if the scheme were to operate over the whole Leicester Urban Area, however this would require a joint scheme with Leicestershire County Council which has stated that it currently does not wish to implement a WPL.
SD9	Part time / hybrid workers (49)	
	It was questioned how the scheme would be charged for part time / hybrid workers.	Any WPL charge is made on the employer. The employer would decide how much of this, if any, is passed onto the employee using workplace parking. WPL is only charged on occupied workplace parking places so hybrid and part-time working would need to be taken into account by the employer when licencing their premises.
SD10	Enforcement process (35)	
	A few respondents questioned how the WPL will be enforced.	Powers to deliver WPL compliance and enforcement are derived from the Transport Act 2000 and are well established in the Nottingham WPL scheme.
SD11	Businesses that operate with shift patterns (26)	
	How the scheme would calculate for businesses who operate on a shift pattern, due to the change-over in	See response ER3
	shifts from workers.	Advice would be provided on specific issues such as this should the WPL be introduced and will build on the Nottingham experience.
		Consideration could be given to the relatively short period of shift changeover and whether this can be exempted from the charging approach.

# Table B7: Education Issues: Total number of comments: 5,632

Further analysis was undertaken from respondents associated with the education sector, given the large number of responses received and their unique role in the city.

Ref	<b>Summary of Comments (Number of Comments)</b>	Leicester City Council Response
ED1	Low pay of some school staff and concerns with cost	of living / unfair charge on the education sector (1127)

	Staff including newly qualified teachers / support staff expressed concern regarding affordability of levy, alongside the cost-of-living crisis.  Lower paid staff particularly had concerns that the levy cost was not fair as it would not be proportionate to their salary.	The WPL applies to employers in the first instance. There are ways in which school employers can help mitigate impacts. For example, where employers decide to pass on some or all of the charge, they could develop a parking policy that takes account of low income and part-time workers or those with childcare responsibilities. Advice would be made available to employers to help them develop travel plans and parking policies which benefit employees.  The council appreciates the concerns felt by many residents given the national cost of living crisis, and this will be a consideration in any decision taken regarding the WPL  Many existing commuters, especially those who are lower paid, do not have access to a car and have no choice but to use other options. Improving these options will help these commuters.
ED2	Recruitment and Retention (988)	
	The WPL scheme would have a detrimental effect on recruitment and retention. It was stated that recruitment for inner city schools is difficult enough without the levy.	See response to ED3.  The WPL investment programme projects would make it easier for all employees, not just car users, to travel to work using other more sustainable travel modes, potentially assisting with staff recruitment and retention.
ED3	Impact on school budgets (881)	
	For many schools, the cost of WPL could represent a significant proportion of their budgets. Schools do not turn a profit, unlike businesses and employees cannot negotiate their salary to fund the WPL cost.  Some respondents questioned whether it was legal to use money for Education for Transport infrastructure.	School bodies like all employers would need to consider options in terms of funding the WPL themselves or passing the charge, wholly or partly, onto employees. As noted above there would be options for employers to consider in terms of how the charges are passed on fairly to take into account specific circumstances including, for example, charging according to salary levels and to take into account recruitment and retention issues.  The City Council would wish to support the development of fair WPL charging
		strategies working with all employers, including schools, and, consider how best to manage the introduction of the levy, as well as encouraging employees to use both existing and new sustainable transport services as they become available.

		WPL has been successfully introduced in Nottingham where schools are charged the levy. Some choose to fund this as an employer and some pass on the costs to employees.  The WPL scheme would be applied equitably across all employment sectors, all of which would benefit from the investments made in transport. It would be inequitable to not charge public sector employers which have similar impacts on congestion, air quality and carbon emissions as private sector employers.  There are not considered to be any legal issues preventing school bodies from paying a WPL and WPL has been successfully introduced in Nottingham with no
		challenge from schools to this end.
ED4	Exemptions & Discounts (696)	
	There were a large number of respondents who stated that schools should be exempt, as schools are a frontline service and the impact of the levy could cause significant damage to the quality of its education system.  It was challenged whether school staff should pay as they do not work 52 weeks per year, but rather 38 weeks. Schools are not businesses so it was felt they should be exempt.	See responses to SD1.
ED5	Use of Public Transport / sustainable transport	concerns (667)
	<ul> <li>Public transport concerns:</li> <li>There would be an increase in journey time and it was not a viable alternative to travelling by car. Also school employees do not travel during peak hours, so do not contribute to peak hour congestion.</li> <li>Public transport does not take into account of situations where staff have to travel into and around the city for their work.</li> </ul>	Short and long-distance commuters would have a better choice of good quality transport. The receipts from WPL would be spent on a programme of transport improvements across the whole city, including fast and frequent bus services on key commuter corridors and serving neighbourhoods; demand responsive local buses; a city-wide cycle network and more and better-connected Park and Ride sites. Linking neighbourhoods and schools within them with these improved services would be a priority.  The majority of school staff will be travelling during peak periods.

	No. 2011 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	<ul> <li>Not suitable when carrying books and high valuable equipment and data which is at risk to GDPR.</li> </ul>	Whilst many school employees will have practical options to get to work and between workplaces using sustainable travel alternatives it is acknowledged that for some this may not be possible. For these the benefits of reduced congestion on their journeys to and from workplaces will be apparent.
		Many existing commuters, especially those who are lower paid, do not have access to a car and have no choice but to use other options. Improving these options will help these commuters.
ED6	Displaced parking (276)	
	There were a number of comments relating to displaced parking into residential areas, already suffering with congestion / parking issues.	Potential problems such as displaced parking have been considered and, if they occurred, would be tackled working closely with schools and residents.
	Concern with charging staff for parking spaces where there is more staff than parking spaces	Charging staff for parking at work is one way of rationing scarce parking spaces when there is more demand than spaces. The Council would provide advice on this and other ways of managing WPL.
ED7	Impact on city education (170)	
	There were a number of responses concerned with	See response at ED3
	the impact on children's' education if the levy was to be funded using school budgets and the service being provided. Particularly for under-privileged children.	occ response at LDo
ED8	the impact on children's' education if the levy was to be funded using school budgets and the service being provided. Particularly for under-privileged children.  Vehicle needed for other personal reasons / work	(155)
ED8	the impact on children's' education if the levy was to be funded using school budgets and the service being provided. Particularly for under-privileged children.	·
ED8	the impact on children's' education if the levy was to be funded using school budgets and the service being provided. Particularly for under-privileged children.  Vehicle needed for other personal reasons / work  A vehicle was still required either for personal reasons or to travel between different school settings throughout the day. It was thought that it was unfair to be charged the levy, particularly when a car is	(155)  The WPL charge is placed in the first instance on employers who will decide whether they pass the charge to employees in full or in part. Employers could for example decide not to pass a charge on to essential car users. The scheme would be applied equitably across all employment sectors, all of which would benefit from the

Public transport is not an option if staff had to drop off children at childcare providers and public transport journey time would mean staff would be late for the start of school.

# See response to ED5

There are ways in which employers can help mitigate impacts. For example, where school employers decide to pass on some or all of the charge, they could develop a parking policy that takes account of low income and part-time worker or those with child-care responsibilities. Advice and guidance will be made available to employers to help them develop company travel plans and parking policies that benefit employees.

# Appendix C: List of media coverage via the internet

Source	Date of publication
Business Live (part of Leicester Mercury)	17 <sup>th</sup> December 2021
BBC Website (local news)	20 <sup>th</sup> December 2021
CiTTi	21st December 2021
TransportXtra.com	4 <sup>th</sup> January 2022
Highways Magazine	6 <sup>th</sup> January 2022
LocalGov	7 <sup>th</sup> January 2022
Fleetnews	11th January 2022
SmartTransport.org.uk	11 <sup>th</sup> January 2022
VAL online	11 <sup>th</sup> January 2022
Express.co.uk	12 <sup>th</sup> January 2022
Bradgate Conservatives	19th January 2022
Brokernews.co.uk	21st January 2022
Observer Newspaper (national)	23 <sup>rd</sup> January 2022
Guardian Newspaper (national)	23 <sup>rd</sup> January 2022
News Concerns	23 <sup>rd</sup> January 2022
Autoexpress	24 <sup>th</sup> January 2022
Institute of Transport Administration	24 <sup>th</sup> January 2022
Cities Today	26 <sup>th</sup> January 2022
Foxes Live	26 <sup>th</sup> January 2022
Grist.org	26 <sup>th</sup> January 2022
Leicester Mercury	26 <sup>th</sup> January 2022
Leicester Mercury	28 <sup>th</sup> January 2022
Leicester City Council e-bulletin	1 <sup>st</sup> February 2022
Leicester Mercury	12 <sup>th</sup> February 2022
Daily Mail	20 <sup>th</sup> February 2022
GBNews	21st February 2022
Itv.com	22 <sup>nd</sup> February 2022
ProCon Leicester Property and Construction	23 <sup>rd</sup> February 2022
Linkedin (article by Peter Wilkinson)	1 <sup>st</sup> March 2022

Business Live (part of Leicester Mercury)	10 <sup>th</sup> March 2022
Express.co.uk	13 <sup>th</sup> March 2022
Leicester City Council Social media	Ongoing throughout consultation
Climate Action Leicester and Leicestershire	Date unknown

# **Appendix D: Virtual Stakeholder Engagement Sessions**

# Stakeholder

Age UK Leicester and Leicestershire

**Bus User Panel** 

**Charles Street Buildings** 

Climate Action Leicester and Leicestershire & Green Party

Cycle City Forum

De Montfort Hall

Department for Transport

FSB / LBV virtual event (Leicester Business Voice)

Hammerson / Highcross

Leicester and Leicestershire Strategic Planning Group

Leicester City Council internal

Leicestershire County Council

LTAP (Leicester Transport Accessibility Panel)

Mattiolli Woods

Newtons 4th Limited

Pepsico / Walkers

ProCon Leicestershire

Samworth Brothers

Schools Forum Briefing Session

Spring Term Meeting with Chair of Governors and Heads

Taxi Liaison Group

Trade Unions - TÜC: Leicester & District TUC

University of Leicester

University Hospitals Leicester (UHL)

Walking Forum

WQE College

Young Peoples' Council (includes Big Mouth Forum, Children in Care council, Parents' Champions)

# Appendix E: List of businesses / organisations who have submitted comments\*

Age UK Leicester and Leicestershire & Rutland

Albian Economics

Alderman Richard Hallam Primary School

Ancora ELD, School Improvement Leicester

**Anstey Parish Council** 

Ash Field Academy

**Babington Academy** 

**Barley Croft Primary School** 

Beauchamp City Sixth Form

Beaumont Leys School

Berkeley Insurance Group

**BHIB Insurance Brokers** 

Blaby District Council

Braunstone Frith Primary Academy

**Briantea Limited** 

Catherine Junior School

Centrebus Limited

**Charity Link** 

Charles Street Building Group and Adagio / Novotel Leicester

**Charnwood Primary School** 

Children's Hospital School

Cite

City of Leicester Association of Special Schools (CLASS)

Claudia Webbe MP

Climate Action Leicester and Leicestershire (and further endorsements)

Councillor Elaine Pantling

Councillor Nigel Porter

Councillor Nita Solanki

Councillor Stephan Gee

Councillor Teresa Aldred

County Bridge Club

**CPRE** 

Daman Community of Leicester

De Montfort University

Discovery Schools Academy Trust

East Midlands Chamber of Commerce

Eastlake and Beachell Limited

**EE Smith Contract Limited** 

**Edward Argar MP** 

**English Martyrs Catholic School** 

Federation of Small Business

First Leicester

Friends of Clarendon Park

Glenfield Parish Council

**GMB** Union

**Granby Primary School** 

Harborough District Council

Harvey Optical

Historic England

Hope Hamilton School

Intaservices

Jane Hunt MP

Jon Ashworth MP (including Gavin George, Constituency Director)

JMS Engineers

**Knighton Dental Practice** 

Learning without Limits Academy Trust

Leicester Branch Communist Party of Britain

Leicester Business Voice (LBV) and Railfuture

Leicester Business Voice (LBV)

Leicester Car Sharing Club

Leicester City Council - Education Welfare Service

Leicester College

Leicester Green Party

Leicester Labour for a Green New Deal

Leicester Partnership School [Secondary Pupil Referral Service]

Leicester Wholesale Fruitmarket

Leicestershire County Council

Leicestershire Labour for a Green New Deal

Leicestershire Police

Liz Kendall MP

LOROS

Marriott Primary School

Mellor Community Primary School

Merrydale Junior School

Moat Community College

Mowmacre Hill Primary School

Mutual Clothing and Supply Co Ltd

**NASUWT** 

National Highways (previously Highways England)

**National Space Centre** 

Natural England

Natural Smiles Corby and Leicester

Natures Friend

New College Leicester

Newtons4th Limited

Northside Bikes

Oadby and Wigston Borough Council

Oak Academies Trust

Overdale Junior School

Parks Primary School

Pepsico UK

**RSPCA** Leicestershire Branch

Samworth Brothers

Scraptoft Valley Primary School

**Shaftesbury Junior School** 

Sir Jonathan North College

Sky Blue Homes

Soar Valley College

**SRM Forest** 

St Thomas Aquinas CMAT

Stagecoach

Stokes Wood Primary School

The Mead Educational Trust

Tim Morton Associates

**Trifibre Limited** 

**Tudor Grange Samworth Academy** 

UHL

Unison

Unite

University of Leicester

University of Leicester and University and College Union

**Uplands Junior Academy** 

Wbs

West Gate School

Wolsey House Primary School

Women's Equality Party Leicester

Working Solutions (Creative IT) Limited

WQE and Regent College Group

Wyvern Primary School

<sup>\*</sup> Based on respondents indicating they were a Business Owner or Organisation Representative and identified the business / organisation they were representing via Citizen's Space or email correspondence received from organisations / political representatives.

**Appendix F: Stakeholders Distribution Map** 

