



Consultation on draft revised Air Quality Strategy **Confederation of Passenger Transport** 21 April 2023

About CPT:

We help a dynamic bus and coach industry to provide better journeys for all, creating greener communities and delivering economic growth.

We do this by representing around 900 members from across the industry be they large or small, bus or coach, operator or supplier. We use our influence to campaign for a supportive policy environment, give our members practical advice and support to run their businesses safely, compliantly and efficiently and bring the industry together to share ideas and best practice. We are ambitious to make things better for passengers, inclusive in seeking out different perspectives and we are always there when our members need us.

Buses and coaches are at the heart of the nation's economic and social life. 5.8 million people a day use buses to get to work and to access essential services; coaches get 600,000 children a day safely to school and provide emergency transport when other services such as rail and flights are cancelled or diverted.

In addition to what it can contribute to improving air quality, the bus and coach sector is well placed to help the government deliver key priorities such as helping people with the cost of living, economic growth, levelling up, combatting social exclusion, and achieving net zero carbon. It is flexible and agile and can respond quickly to changing demands – investment in the bus and coach sector is good value for money.

Question 8: How do you feel local authorities can most effectively reduce pollution from transport and non-road mobile machinery (NRMM)?

Encourage people to use bus and coach

1. The most efficient way to reduce pollution from transport is to encourage people to switch to bus and coach from car. A full double decker bus is able to take 75 cars off our roads, and a full coach can take 50 cars off the road. To achieve this, a range of policies are required:
 - Increasing the attractiveness of the bus network by implementing measures that keep buses out of congestion, ensuring faster journeys for customers
 - Keeping fares low
 - Discouraging the use of car
 - Behavioural interventions to influence customer choices
 - Positive coach policies including the appropriate and affordable provision of coach parking in town and city centres.



2. In our report, [The Route to Net Zero](#), we outline how this could be achieved through partnership working between local authorities, government and bus operators.
3. [The report](#) models in more detail the benefits that could be reaped by various policies to deliver modal shift through the interventions set out above. It shows that combinations of such policies could get us a long way towards delivering on net zero carbon goals as well as bringing a whole range of other economic, health and social benefits, including air quality. For example, more ambitious investment in bus services and infrastructure (such as through higher funding of more BSIPs) combined with a longer term £2 bus fare cap and congestion charging in urban local authorities in England could result in:
 - A reduction in emissions of 10 million tons of CO₂
 - Air quality benefits worth almost £19m.
4. Congestion is a continuing major challenge in our towns and cities, constraining growth and contributing to poor air quality.
5. The economic costs of congestion are at least £11bn per year in urban areas in England. Roadside emissions from traffic – in particular cars - account for a large amount of poor air quality and halving average city traffic speeds leads to a 50% increase in harmful nitrogen oxide emissions.¹
6. A full double decker bus is able to take 75 cars – or almost 2 miles of traffic – off our roads. However, they are particularly badly affected by congestion, with increased journey times and reliability affecting both running costs and passenger numbers. Research by KPMG suggests that over 160 million bus journeys over five years have been lost as a result of bus journey times².
7. By tackling congestion and speeding up bus journeys we will encourage more people to use the bus; 25% of car users would consider switching to buses if they were more reliable, which would help deliver³ better air quality and reduced carbon emissions across our towns and cities.
8. If we can encourage people to shift their mode of transport by leaving their cars at home and travelling by bus and coach, we could significantly reduce both congestion and air pollution.
9. We need ambitious bus priority measures that give motorists a real option to make a change that improves their travel options and slashes roadside emissions.

¹ [Greenerjourneys.com/blog/congestion-not-just-drag-economy-kills/](https://greenerjourneys.com/blog/congestion-not-just-drag-economy-kills/)

² <http://www.cpt-uk.org/uploads/attachment/4639.PDF>

³ <https://greenerjourneys.com/news/ditch-the-car-this-catch-the-bus-week/>



Clean Air Zones (CAZ)

10. The Government's Clean Air Strategy 2019 introduced Clean Air Zones as one of the methods local authorities could implement to improve air quality.
11. The framework means that buses and coaches are charged in every class of zone, with public cars only brought into scope in the final class, which targets all vehicles. Thus a large number of Clean Air Zone strategies are proposing to introduce charges for non compliant coaches and buses, but not cars. These strategies penalise those who have already opted for an environmentally sustainable option and do not target the root cause of poor air quality, increased levels of congestion.
12. This will not tackle the root cause of poor air quality. Coaches and buses should only be required to meet emission standards or pay a charge in areas where cars and taxis are also required to meet emission standards.
13. As noted above, increasing modal shift away from the private car and onto buses and coaches will significantly reduce harmful transport emissions. Improving journey times and reliability by giving bus priority on our networks will encourage more people to use the bus and dramatically reduce the emissions caused by congestion.
14. Local authorities with emissions requirements should follow Portsmouth's example and make funding available to operators who regularly enter the Clean Air Zone, not just those located within the zone, so they can invest in new vehicles or retrofit solutions.

What Local Government can do:

- 1. Introduce and deliver bus priority measures in local authority areas to improve journey times and connectivity for customers, and help provide more reliable services. These can range from network wide interventions and large infrastructure schemes, to small scale changes like traffic light signalling and junctions to transform the reliability of routes**
- 2. Provide the necessary enforcement of policies such as bus lanes and coach parking, to ensure that priority measures encouraging public transport use can reach their full potential**
- 3. Implement positive coach policies including appropriate and affordable provision of coach parking in town and city centres**
- 4. Work closely with bus operators on BSIPs and Enhanced Partnerships to ensure that ambitious, locally suitable plans are in place to ensure the future of bus services (through measures which may include bus priority measures, cheaper/ capped fares)**



5. **Work with local operators to rebuild passenger confidence with a strong pro public transport message that encourages passengers back on to buses and coaches**
6. **Only require coaches and buses to meet emission standards or pay a charge in areas where cars and taxis are also required to meet emission standards**
7. **Make funding available to coach operators who regularly enter the Clean Air Zone, not just those located within the zone, so they can invest in new vehicles or retrofit solutions.**

What Government can do:

1. **Create a new class of clean air zones to enable local authorities to charge cars without charging coaches and buses**
2. **Create a national clean air fund to support coach operators to invest in new vehicles or to retrofit existing vehicles to meet Clean Air Zone requirements.**
3. **Fund more BSIPs to enable local authorities and bus operators to fully implement their jointly, locally developed bus service improvement plans**
4. **Ensuring that coach facilities and access form an integral part of the planning process for locations likely to receive large numbers of visitors.**

Conclusion

The bus and coach sector is ideally placed to work with local authorities to improve air quality. With Local Authorities' commitment to improving congestion and implementing bus and coach friendly policies, alongside positive messaging to promote bus and coach use, we believe real traction can be made.

In addition to this, central Government should provide certainty around longer term bus funding to local authorities and operators, fund more BSIPS, and look again at the Clean Air Zones legislation to ensure that buses and coaches are not penalised, which undermines the schemes.

We urge both central Government and Local Authorities to work with the bus and coach sector to enable the industry to be in the best position to provide a strong, stable and fit for purpose network across England.

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