# National Planning Policy Framework consultation – response by the Confederation of Passenger Transport (CPT)

## About us

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 800 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're ambitious to make things better for passengers, inclusive in seeking out different perspectives and we're always there when our members need us.

Buses and coaches are at the heart of the nation's economic and social life. 10.2 million journeys a day are made by bus to get passengers to work, education and to access essential services.[1] Coaches connect thousands of places that otherwise would not be served by public transport, taking over 6 million people on 475 million journeys each year.[2]

## Introduction

The Confederation of Passenger Transport (CPT) welcomes the opportunity to respond to the government's consultation on proposed reform to the National Planning Policy Framework (NPPF) as well as other changes to the planning system.

Planning reform is a vital opportunity to reset the relationship between planning and public transport. The planning system must operate to support bus and coach operations, expand the availability of public transport, and drive modal shift, thereby supporting the creation of healthier, greener, and better-connected communities.

CPT supports the government's amendments to section 9 of the NPPF, and the creation of a 'vision-led' approach to promote sustainable transport modes. CPT believes that this approach should be a *bus-first* vision for placemaking, and this vision should be integrated within the NPPF and into the broader planning and economic policies of the government.

CPT believes that draft paragraph 106 could include a reference to public transport challenging car dependence. CPT believes that in draft paragraph 114, the NPPF should be more assertive in promoting public transport, especially bus, which is an enabler of more walking. Where planning policy seeks to support making walking and cycling more 'attractive', similar thought must be given to bus services.

A *bus-first* vision for placemaking will:

[1] bus01.ods (live.com)

[2] KPMG, 'Economic Impact of Coach Services', due to published October 2024.

- Place bus provision at the centre of **all** planning decisions, requiring both local authorities and developers to "think bus" when placemaking;
- Challenge excessive car dependence and drive modal shift away from personal cars in favour of buses, reducing carbon emissions, and creating greener, healthier communities;
- Provide greater assurance to operators about the long-term sustainability of bus routes, driving investment in services and strengthening the relationship between bus operators and the communities they serve; and
- Act as a model for the future growth of the UK and a joined-up, coherent public transport network, where buses are better integrated into daily life for millions more people, and continue to support economic activity.

**Why a *bus-first* vision for placemaking:**

- **Sustainability and health**
  Buses are a highly sustainable transport mode, with the average bus journey emitting between 2.6 and 3.5 times less $CO_2$ per passenger than the average car journey.[3] Each bus can take up to 75 cars off the road, significantly boosting air quality, and reducing instances of respiratory illness.[4]

  Adopting a *bus-first* approach and effectively driving modal shift onto buses could result in greenhouse gas emission savings of as much as 15.8 million tonnes of $CO_2$ by 2050.[5] Moreover, modal shift can be delivered without requiring any technologies to mature or significant capital investment, enabling communities to see immediate benefits.

  Modal shift represents an opportunity to create healthier communities. The implementation of the ULEZ in Greater London demonstrates that reduced car use results in fewer instances of respiratory illness, and a reduction in the number of deaths attributable to air pollution.[6] WPI Economics estimates that in addition to reduced illness, the health benefits from improvements in lifestyle, reductions in road accidents and reductions in noise pollution could total as much as £14.9bn by 2050.[7]

  Adopting *bus-first* planning is therefore a means of supporting local authorities to promote healthy communities, as question 70 of the NPPF consultation interrogates. It is also a course of action that will support the UK to address the challenge of climate change, as question 81 of the consultation interrogates.

- **Connectivity and flexibility**

[3] KPMG, 'Economic Value of Local Bus Services', September 2024, p.16.
[4] CPT, The value of bus and coach, https://www.cpt-uk.org/what-we-think/the-value-of-bus-and-coach.
[5] WPI Economics, 'The decarbonisation dividend', https://www.cpt-uk.org/media/fc0bzccy/decarbonisation-dividend-report.pdf, July 2022, p.5. $CO_2$ saving calculated on the basis of everyone switching two car journeys per month to bus. A greater modal shift will result in higher $CO_2$ savings.
[6] https://www.london.gov.uk/media-centre/mayors-press-releases/new-data-shows-mayors-ulez-expansion-working-better-expected-bringing-cleaner-air-five-million-more, July 2024.
[7] WPI Economics, 'The decarbonisation dividend'.

The government's ambitious agenda to build 1.5 million houses and construct new towns in the UK requires an equally ambitious approach to public transport provision. It also represents a golden opportunity to develop new types of housing which could act as an example for future developments. Over the last decade, it has been commonplace that new housing developments are planned and built in the suburbs, owing in part to the availability of suitable land, and current planning rules around urban density.[8] However, this has also resulted in increased car dependence being locked in.[9]

It is likely that continued development in the suburbs will remain a feature of housebuilding, with many of these developments likely to be located in areas that will be inaccessible by active travel means alone. Moreover, 'grey belt' land that the government wants to prioritise for development often has existing road links or road infrastructure, thereby making it a prime target for the provision of bus services. CPT believes that *bus-first* planning policy strongly supports the government's proposed 'golden rules' for major development on land released from the Green Belt.

*Bus first* represents an obvious solution, ensuring that new communities are well connected and residents are able to access local amenities with ease, while at the same time creating a genuine alternative to car dependence. Integrating a *bus-first* vision within planning guidance could help to significantly discourage excessive car use, and thereby drive modal shift. Modal shift has already been identified as a key government public transport priority, which must be integrated within the planning system.[10]

A *bus-first* vision enables operators to overcome concerns about the economic viability of establishing new bus routes to service new communities. *Bus first* would require developers to plan with bus infrastructure in mind, but also consider how the development could discourage excessive car ownership and use. This should involve limiting the number of car parking spaces that are available per house, with many houses not being allocated car parking spaces at all. These requirements should be written into planning frameworks, thereby giving clear direction to housebuilders about the kind of future development that the UK must prioritise.

*Bus first* also represents the most flexible means of sustainable public transport. Services can be easily adapted to accommodate increased demand caused by development of new housing, new leisure venues, and new locations for education or employment. As housing developments expand over time, the economic viability of bus routes servicing these developments expands, especially if continued development follows the same practices of discouraging

[8] Of 803,000 houses built between 2011 and 2019 in and around city and town centres, 91.5 per cent have been built in suburban locations: https://www.bbc.co.uk/news/explainers-51577853, February 2020.
[9] https://www.route-one.net/features/new-housing-developments-a-lost-cause-for-bus/.
[10] Arup, 'The rail and urban transport review', https://www.urbantransportgroup.org/resources/types/report/rail-and-urban-transport-review, August 2024, p.11.

car use, restricting road space available to cars, and prioritising buses first above other vehicles.[11]

**Section 106 contributions**

CPT members are clear that section 106 contributions are a vital part of ensuring the successful establishment of bus services for new developments. However, where section 106 agreements are overly prescriptive, they can result in a failure to deliver much needed bus routes, or else establish a bus route for an insufficient period of time to allow the route to become commercially viable (which requires a minimum of 2-3 years).

CPT members have cited examples of the deficiencies of S106 orders:

- In one instance, an overly prescriptive S106 order, which stipulated the precise route that a bus service was to follow, also contained a clawback clause which allowed the developer to claim back the funds committed after 5 years if the bus service had not been established. Consequently, the developer left a 50 yard section of crucial road unfinished for long enough to ensure that the S106 contribution was returned and no bus service delivered.
- S106 orders are often fixed sums, which fail to take account of inflation. Where a significant amount of time passes between the initial agreement of the S106 and the operation of the bus service, inflation often renders the fixed sum insufficient to cover operating costs.

Section 106 contributions must be sufficiently flexible to recognise evolving travel patterns between the preparation of an initial planning application and the commissioning of the bus services, which can be as much as 10 years for large developments. Moreover, developers must be obliged to complete, in a timely fashion, the infrastructure necessary to allow the operation of the bus service.[12]

- **Enabling economic growth**

CPT recently commissioned KPMG to undertake research on the scale and contribution of bus both economically and socially. This work found that investing in bus services and infrastructure at both a regional and a national level is capable of yielding benefits equal to £4.55 for every £1 invested.[13]

Pursuing a *bus-first* policy within the planning system is key to unlocking further benefits than those already realised, which include:

[11] First Bus White Paper, https://www.firstbus.co.uk/about-us/about-us/our-vision, 2024, p.10.
[12] CPT would be happy to provide further context and detail about the use of section 106 contributions, and proposals for how section 106 contributions can be better utilised to establish long-term, economically viable bus services.
[13] KMPG, 'Economic Value of Local Bus Services', September 2024.

- Employing 105,000 people and supporting the employment of a further 53,000 in the supply chain, thereby contributing **£11.3bn** to the UK economy
- Passenger spending of almost **£40bn** each year in shops, cafés, restaurants and leisure destinations, driving the growth of local economies
- Enabling 2.2m commuters to get to work, contributing over **£72bn** to the economy

*Bus-first* planning is a means of enhancing the economic contribution that buses make to the UK economy. With the government's focus on sustainable economic growth, investment in bus through the development of *bus-first* planning should be a top priority.

**How the planning system and government policy can support a *bus-first* vision for placemaking**

CPT believes that the key principles outlined below will support a *bus-first* vision for placemaking. Integrating these key principles within the NPPF, and within other planning guidelines issued to local authorities, will help realise a *bus-first* vision and the benefits associated with it.

***Developers should:***

- Design proposals to meet housing and infrastructure needs with bus infrastructure already integrated as an immovable part of the plan, laying out how new developments will include bus infrastructure and bus priority measures which put bus first on the road network. This includes electric vehicle charging for buses, as well as driver facilities, such as rest stops and toilets.

- Design proposals for homes that have limited car parking capacity, with homes restricted to fewer car parking spaces, and many built with no dedicated parking allocation at all.

- Design proposals for leisure facilities, workplaces, cultural attractions and other places with buses and coaches prioritised as the primary means of reaching that destination, with limited car parking made available to encourage a cultural and behavioural shift that prioritises bus first.

- Design future road use proposals with buses and coaches prioritised, which will support the reduction of congestion, make buses and coaches quicker and more reliable, and thereby create the virtuous circle of increased patronage and modal shift.

***Planning authorities and local government should:***

- Bring bus operators into discussions about new developments at the earliest possible opportunity, laying out how operators can support the design of developments friendly to bus operation.

- Robustly scrutinise designs for new developments that insufficiently challenge car dependence and fail to optimise opportunities for buses and coaches to be used in lieu of cars.

- Remain cognisant of the need to provide improved bus and coach infrastructure in already existing developments and urban areas, taking account of demographic changes which may necessitate urban improvements.

- Utilise Section 106 contributions to support the establishment of bus networks, and effectively enforce payment of these contributions to ensure that bus routes are able to be developed and given sufficient time to become profitable.

***Government should:***

- Integrate the *bus-first* vision within planning policy, and provide guidance for local authorities to that effect.

- Ensure that Section 106 contributions are always enforced, collected, and allocated in a timely fashion, and ensure that developers are legally obliged to deliver the infrastructure required to make new bus services viable.

CPT would be delighted to discuss the above response in more detail. For more information, please contact Policy Manager Nicholas Jessup (nicholas.jessup@cpt-uk.org).