

PLANNING FOR THE FUTURE: GOVERNMENT CONSULTATION ON PROPOSALS FOR REFORM OF THE PLANNING SYSTEM IN ENGLAND

SUBMISSION BY THE CONFEDERATION OF PASSENGER TRANSPORT

1. The Confederation of Passenger Transport (CPT) represents the operators of bus and coach services across the UK. We have more than one thousand enterprises in membership, including major PLCs, municipally-owned companies and family businesses with fewer than ten vehicles and accounting for in excess of 95% of the bus fleet and 55% of coach fleet in the UK.
2. Some of our member bus operators will be submitting more detailed representations to this consultation; this submission is intended to complement, and should be read alongside, those.

The importance of public transport provision in delivering Government priorities

3. It is vital that the planning system in England promotes the importance of public transport provision – in particular bus and coach - in both new and existing developments, to support the Government's economic, social inclusion and environmental goals (including net zero ambitions). This should be a principle objective of the national planning framework which filters down to regional and local level.
4. The Government recognised the important role of public transport in delivering its decarbonisation agenda in its framework document for the National Transport Decarbonisation Strategy published in March 2020 which states: "*Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network.*" National Planning Policy and Guidance needs to facilitate this by making the provision of public transport and active travel infrastructure a requirement of future Local Plans and developments.
5. Buses and coaches are also crucial to the Government's 'levelling up' agenda. Effective and relevant bus networks and services remain key to securing increases in productivity and social inclusion across localities. Outside London local bus patronage has returned as much as three times quicker than the railway. This shows the wider and deeper relevance of buses for mobility across all geographies and sections of society.
6. Higher levels of active travel and public transport modes will also help to secure health and well-being benefits and the new planning system can help to deliver this.
7. Substantial mode shift to bus and coach, alongside walking and cycling, is key to unlocking a healthy, carbon-free travel transformation across England.

What does this mean for National Planning Policy and Guidance?

8. The promotion of public transport provision, alongside other active travel measures, should be a principle objective of the national planning framework which filters down to regional and local level. Local authorities should be answerable for ambitious targets to deliver mode shift towards sustainable methods of transport, including buses and coaches, and transport-related standards and outcomes for new developments should be set, against which local planning authorities and developers are accountable.
9. Development should be steered towards existing and potential public transport corridors and the new definition of sustainable development should include provision for and promotion of active travel, including public transport and in particular buses and coaches. The new “sustainable development test” must ensure that the Local Plan and subsequent major development proposals provide a sound basis to rapidly reduce carbon emissions from transport through the promotion of active travel, including public transport, and facilitate the economic, social, environmental and health benefits that this will bring about.
10. Local plans and local transport plans should be aligned and local bus operators should be involved in the process for determining and delivering development. Housing estates must be designed with the bus in mind – for example ensuring there is sufficient road space for buses and bus stops, room for the bus to turn, and pedestrian access to bus stops. Where public transport provision is good, a lack of car parking need not be a barrier to development. Indeed, it may be seen as a positive driver of sustainable transport choices.
11. Reducing congestion on our roads is essential. The economic costs of congestion are at least £11 billion per year in urban areas in England.¹ Reducing journey times opens up wider job markets for people and improves air quality – halving average city centre traffic speeds leads to a 50% increase in harmful nitrogen oxide emissions.² Whilst moving to zero emission cars clearly has an impact on air quality and carbon emissions, it does nothing to reduce traffic and congestion. To truly tackle these issues – along with wider health and environmental issues - we need great increases in the provision and uptake of shared mobility as well as active travel.

Proposals for a consolidated infrastructure levy

12. Any new, consolidated infrastructure levy needs to capture sufficient value to support greater investment in bus and coach infrastructure, and a certain amount should be ‘ring fenced’ for this. Furthermore, anyone taking forward a development over a certain size should be required to partner with the local bus operator to demonstrate how it will deliver actual improvements to services.
13. It is proposed that developer provision of affordable housing can be offset against the levy. There could be a similar provision for public transport infrastructure so that developers can offset Levy liabilities where they are investing in specific public transport measures that truly

¹ Greener Journeys (July 2012) *Buses and Economic Growth: Summary of Report by the University of Leeds, Institute for Transport Studies*

² greenerjourneys.com/blog/congestion-not-just-drag-on-economy-kills/

mitigate development impacts, especially where these have broader positive off-site impacts in the corridor concerned such as improved frequencies, connectivity or better evening and Sunday provision.

14. It is vital that Government is clear by whom and on what basis the funding collected will be allocated and spent, and to ensure that sufficient capacity to deliver the investments is also in place, whether in local government or other agencies.

Conclusion

15. Pre-pandemic bus commuters contributed £64bn to the economy and bus passengers were responsible for a third of all city centre expenditure (£21bn). Buses and coaches are also an environmentally friendly form of transport - a new diesel bus is cleaner than a diesel car, and a fully loaded double decker bus can take 75 cars off the road.
16. This reform of National Planning Policy provides an opportunity for buses and coaches to play a significant role in the country's green economic recovery and for Government to secure delivery of a wide range of economic, social and environmental goals through ensuring that bus and coach travel, alongside other forms of active travel, are at the heart of all developments. This must be a principle objective of the national planning framework which filters down to regional and local level.