



National Planning Policy Framework Confederation of Passenger Transport 2 March 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.

Response:

Thank you for the opportunity to respond to this wide ranging consultation. We believe that it is crucial that the planning system is explicitly directed towards supporting the infrastructure and operational needs of key public services, including public transport.

To ensure against car dependency being further exacerbated in the future, development strategies and proposals should have to demonstrate that sustainable modes, including public transport, can credibly meet a wide range of daily travel needs. There should be a presumption against unrestricted parking, and real efforts to tackle congestion. A revised Framework and the National Development Management Policies must seek to ensure this.

It is imperative that buses and public transport on the whole are given the consideration required in developments, to ensure that residents have full access to jobs, education, social activities and healthcare, without having to rely on car use. This will help to deliver the Government's levelling up agenda, and move the country closer towards achieving its net zero goals.

Our asks from the planning system:

1. Planning policy, including the National Development Management Policy, needs to make much more explicit provision to facilitate improvements in bus service reliability and efficiency (including tackling congestion) and ensure bus networks and public transport links are an integral part of developments. The Government should "level up" the influence of transport matters in plan making and decision taking, and clearly define robust objectives. This in turn will support the Government's wider levelling up agenda.



2. Modal shift from car to bus is the most efficient way to move towards achieving net zero targets. Planning policy has to be founded on stronger and more consistent transport evidence, given that this is the largest source of domestic emissions, and the area most amenable to be influenced by long term patterns of development.
3. Planning policy should require planners and decision makers to take into account the operational needs expressed by key public transport providers and seek as far as possible to identify and bring forward such new and expanded facilities (including bus depots) as are necessary to support their operations.

Levelling Up and Economic Development

Effective bus networks are crucial to delivering many of the Government's levelling up objectives and also have a socio-economic benefits in communities, which is why they should be clearly reflected in planning policy. Buses provide vital community links, particularly for those one in four people without access to a car, including a pivotal role in accessing education, training, work, and key services such as primary care and hospitals. Added to this are the journeys made by bus and coach for leisure and social activities. In addition, the poorest fifth of households are three times more likely to use the bus than the richest fifth. Our services are used by the broadest spectrum of the population, from almost all socio-economic groups. However, they are disproportionately important to the most socially and economically isolated and vulnerable, by reasons of age, disability, income and place of residence.

A 10% increase in bus connectivity reduces deprivation by 3.6% and increases incomes due to better access to employment, training and education opportunities. In addition, more bus journeys also help deliver net zero targets – this cannot be achieved without a vibrant bus network and significant modal shift from car to bus.

There should be a presumption against providing unrestricted car parking for both residential and “destination” developments, particularly office and retail. Strategies based on Section 106 contributions to the provision of bus services, information and season tickets should be the norm for residential and employment sites, and enforced at a local level. They also need to be sufficiently long lasting to give new or diverted bus services the chance to become commercially sustainable.

We therefore believe that planning policy – including the National Development Management Policy – needs to make much more explicit provision to facilitate improvements in bus service reliability and efficiency and to ensure excellent bus networks and public transport links are an integral part of new developments. This should draw directly on Local Transport Plans (LTPs), and have particular regard to facilitating and taking advantage of the shorter term objectives for local bus service improvements set out in Bus Service Improvement Plans (BSIPs).



Assessing the Carbon Impact

Consideration must also be given to the impacts developments have on congestion as this affects public health as well as economic efficiency. Congestion costs the economy £13bn a year, and buses and coaches are the solution. A full double decker bus can take 75 cars off the road, but bus networks are hampered by congestion which slows them down and makes them unreliable. Operators can only provide efficient and attractive networks/services if we are protected from the adverse effects of this through bus priority measures and modal shift from cars to bus. Planning policy needs to take this into account and consider how it will put bus first on the road network.

We welcome the suggestion that National Development Management policies should set standards and clear methodologies for assessing the carbon impact of developments. In particular, this should address the carbon impact of travel demands set up by the development, and the likely mode share used by residents or other occupiers – for example staff in logistics and distribution parks.

Houses in new developments are often now provided with car charging and trip attractors with dedicated spaces for electric cars – again often with chargers. We believe that to tackle congestion, the emphasis needs to be on modal shift not just on moving people from petrol/diesel cars to electric. A 100% electrified car fleet causes just as much congestion as today, and may be less accessible to lower income families, due the cost of electric cars leaving more people unable to afford to purchase them, as well as the ongoing issues for people unable to drive, acquire a license or physically travel in a private car.

Impact of Transport Matters on Planning Decisions

If plans are to satisfy the Government's net zero commitment, they have to be founded on stronger and more consistent transport evidence, given that this is the largest source of domestic emissions, and the area most amenable to be influenced by long term patterns of development. Modal shift from car to bus is the most efficient way to move towards achieving net zero targets, and this should be recognised in the development of plans.

There is a need to ensure that land use and transport planning is aligned. This is recognised by government and has been the subject of explicit commitments in the National Decarbonisation Strategy for Transport and the Net Zero Strategy. We believe that transport matters should have as much influence on planning decisions steering patterns of development and development design as other themes that are considered (including ecology/biodiversity, landscape, flooding, heritage). We ask the Government to “level up” the influence of transport matters in plan making and decision taking, and clearly define objectives for consideration by planners.

CPT welcomes the proposal for much clearer responsibility on planning authorities to provide Infrastructure Delivery Plans. It would be helpful if the content of the IDPs



was set out clearly, and if there was an explanation as to how they relate to and draw from new style Local Transport Plans and strategies – including Bus Service Improvement Plans.

Currently, there is no Guidance relating to transport evidence for local plans. To inform their plan strategy, while also satisfying the needs of Environmental Assessment, Government should seek to define (1) what the evidence it should include; (2) what sources it should rely on, and (3) how and when it should be used to inform the Plan.

We believe that the proposals to remove the explicit requirement that plans should be “justified” will not achieve the objective of making local plans faster to prepare or quicker to examine. It may instead create a level of confusion on the role and weight of transport evidence in plan making, and could undermine the achievement of any attempts to use the planning system to achieve a step change in the energy and carbon intensity of the built environment.

Green Belt

The operation of the current system means that housing needs have not consistently been met in locations suitably close to where need arises – especially in our most dynamic city regions. There is a direct link between increasing numbers of longer car based journeys, and the availability and costs of housing.

We believe that policy should be directed to ensure that especially where Green Belt is to remain unaltered in plans, or housing need are to be met in neighbouring authorities, that efficient seamless public transport priority corridors are included on the main routes across it, to ensure that public transport modes play the fullest possible role in addressing the energy and carbon impacts of these longer journeys, and maximising the economic and social inclusion of city regions.

Bus Depots

The bus sector relies on operating centres (bus depots) to provide services to the public. Generally these are most advantageously located within urban areas. Many such sites are assets that are a legacy of decisions made decades ago. However, if buses are to deliver the step change in the level and range of services require to support government policy, it is clear that a very significant investments in expanded, and additional bus depots will be required.

In many locations, legacy operating centres lie in predominantly residential areas where there is no distribution network capacity for power sufficient to permit the potential future electrification of buses. Given the fact bus operators are leading the transition to battery electric fleets across all modes, it is vital that the planning system supports and delivers suitable facilities to support the decarbonisation of bus fleets.



Bus depot facilities are not directly supported or provided for by planning policies that allocate employment land. However, they represent a substantial source of employment, and need to be well located to allow staff to start and finish shifts at anti social hours. They also have significant land requirements, but at between 1 and 3 hectares, these lie at an intermediate level between small businesses, and the larger the industrial, logistics and distribution sector.

Planning policy should require plan makers and decision takers to pay explicit regard to the operational needs expressed by key public transport providers and seek as far as possible to identify and bring forward such new and expanded facilities as are necessary to support their operations.

Conclusion:

It is imperative that buses and public transport on the whole are given the consideration required in developments, to ensure that residents have full access to jobs, education, social activities and healthcare, without having to rely on car use.

Planning decisions that ensure that buses are given priority on roads, and that bus networks are integral to new developments will help the Government to deliver on its levelling up agenda and net zero commitments.

We would be happy to meet with officials to discuss or expand on any aspect of our response.

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