



Confederation of Passenger Transport (CPT) Scotland Response to Draft National Planning Framework 4

March 2022

We welcome the opportunity to respond to the Scottish Government Consultation titled [Draft National Planning Framework 4](#).

Who we are

The Confederation of Passenger Transport (CPT) Scotland is the trade association for the bus and coach sectors. CPT facilitates a dynamic bus and coach industry in Scotland to provide better journeys for all, creating greener communities and delivering economic growth. We do this by representing over 100 members in Scotland from across the industry be they large or small, bus or coach, operator or supplier. We 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.

Context

73% of all public transport journeys are made by bus. The bus and coach sector has an important role to play in the economic and environmental recovery of Scotland as we come out of the pandemic. To be able to deliver on the ambitions to help us all achieve a just and green transition and to be able to attain the numerous sustainable transport targets set by the Scottish Government in the National Transport Strategy 2, STPR2, and Climate Change Plan, the prioritisation of buses and sustainable transport in planning decisions and spatial strategies will be vital.

Consultation Questions Answered

Q1: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Yes. Making places more sustainable will be crucial to these goals. Bus and coach will play an essential role within transforming our travel habits, transitioning to net zero and providing sustainable mass transit to connect communities, improve social inclusion, and open up accessibility to services and facilities across the country.



CPT Scotland believes that prioritising sustainable transport options in planning decisions will result in places which will be better connected with public transport options, less congested by cars, have cleaner air, safer roads¹ and create better access to work, education, facilities, and services for the people living in them.

Q2: Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Yes, CPT Scotland agrees that making it easier for people to access facilities and services locally is important to help reduce some journeys. However, it is important that language in NPF4 recognises that not all 20 minute neighbourhoods will have all the facilities, employment and services needed for locals. To access these and link with friends and family, locals will need to travel between 20 minute neighbourhoods and this is when sustainable public transport comes in. Travel hubs and bus prioritisation options will play a key role making sure that active travel and public transport are seamlessly linked. Spatial planning must also take into account that any removal of roads will also result in removal of public transport options.

Q3: Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

Yes. CPT Scotland believes that making sure all communities and developments are well connected via sustainable transport options through planning mechanisms will help reduce car use on our roads, which in turn will reduce congestion, improve air quality and road safety and make our buses more reliable, quicker and cheaper.

Equally, the push for decarbonisation of the bus fleet provides a huge economic opportunity for Scottish businesses. We have a growing sector looking at electric and hydrogen vehicles. In Scotland we have ADL who produce high quality electric and hydrogen buses, alongside many other businesses involved in the production and supply processes for vehicles, infrastructure, charging and maintenance of these green fleets. Policies aimed at decarbonising our public transport options is key to their ability to expand, creating new jobs and contributing to the Scottish economy. It is also

¹ *School Streets*, Sustrans, accessed March 2022 <https://www.sustrans.org.uk/our-blog/opinion/2020/august/school-streets-provide-solution-to-inactivity-congestion-and-air-pollution>



important to note that public transport is a sustainable transport option and every worker in the sector contributes to a greener economy. Finally, public transport and our wider network of suppliers and manufacturers are a large employer in Scotland, with over 14,000 employed by bus and coach operators alone².

Q4: Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Yes. CPT Scotland believes that prioritising sustainable transport options and instigating car demand management measures in planning decisions and spatial planning will reduce car use. Less cars on our roads will result in cleaner air, safer roads and less congestion. Over the last 50 years, bus journey times have increased by almost 50% in the more congested urban areas. The net result has been a significant decline in bus use from over 13 billion journeys a year in UK to less than 5 billion. This shows a direct correlation between operating speeds and patronage: research has shown that a reduction of 10% in bus speeds is estimated to result in a loss of between 9.6% and 14% in patronage.³ With less congestion buses and coaches become quicker and more reliable and therefore cheaper to run for operators. Faster, cheaper and more reliable public transport options incentivises people to use them.

Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

Yes. CPT Scotland believes that placing a priority on sustainable transport options in spatial plans and planning decisions will make public transport options cheaper, more reliable, and quicker. This means public transport options become more attractive for people to use, leaving their cars at home. This reduces congestion making our streets safer, cleaner, and better places to live near to. Additionally cheaper and more reliable public transport options will open up access to work, education, and facilities for many who could not access them before due to them not having a car.

² *Transport Statistics- Bus and Coach*, Transport Scotland, accessed March 2022

<https://www.transport.gov.scot/publication/scottish-transport-statistics-no-39-2020-edition/chapter-2-bus-and-coach-travel/>

³ *Intervention 10 – Reallocation of roadspace for buses*, STPR2, , Transport Scotland, accessed March 2022
<https://www.transport.gov.scot/media/49062/stpr2-phase-1-ast-project-10-bus-priority-3-feb-2021.pdf>



Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

It depends. CPT Scotland believes that the spatial principles are correct but have to be considered in the wider context. For example, compact growth and local living have their limits. Some family members, services, facilities, jobs, and education institutions will likely be outwith the local areas people live in. In those circumstances, mass transit links will still be needed to get people from their areas of compact local living to other areas. Local spatial plans need to make sure those connections are embedded in, and the principles need to reflect that too. So “local living with public transport connections” should be the principle strived for in this framework.

We also welcome a just transition as a principle. As the document states, we have to make sure that the just transition “journey is fair and creates a better future for everyone”. This also has to be the case for all organisations that are asked to contribute to the Net Zero targets set by government. For example, the Programme for Government sets out the highly ambitious target for bus decarbonisation of replacing half the diesel bus fleet by 2023. Bus operators are already engaged in the decarbonisation process, making greater progress to reduce carbon emissions than any other transport mode. However, in accelerating targets, it is important that bus operators are not penalised and, to that end, the Scottish Government has provided funding via the [Scottish Zero Emission Bus \(ScotZEB\)](#) challenge fund scheme to help purchase new zero emission buses. It is important to note that this scheme provides less than 40% towards total cost of new zero emission bus, with operators making up the difference. This government contribution is getting progressively lower during each round of funding. Bus operators are coming out of a challenging time with Covid, unable to generate any profit over the last two years. There are those, many of them SMEs, which simply cannot afford to decarbonise their fleets at this moment. This means they are left at a disadvantage compared to other, larger operators, who may have the ability to take advantage of the ScotZEB scheme currently. These local companies are not getting a just transition. The principle has to include the ability of local businesses to be more able to shape their places and transition to net zero and environmentally sustainable ways of living. Currently the plan focusses only on local people and where they live, not the businesses they work in.

Q14: Do you agree with this summary of challenges and opportunities for this action area?

Yes and No. CPT Scotland broadly agrees with the actions presented in the Central Urban Transformation but we have some issues regarding the opportunities. It is our belief that more focus on public transport should be



made in many of these action areas. It is noticeable that active travel is mentioned in several areas whilst public transport, especially bus, is not. We appreciate active travel sits top of the sustainable transport hierarchy, however, public transport sits just below and has just as an important role to play in connecting our communities and opening up access to jobs, education and social activities. We believe NPF4 should recognise that almost three quarters of all public transport journeys are made by bus and that should be reflected through recognition of its need in action areas.

Q15: What are your views on these strategic actions for this action area?

13. Pioneer low-carbon, resilient urban living

Whilst we broadly agree with the premise of 20 minute neighbourhoods it is very clear that the consideration of public travel is missing. Active travel is specifically mentioned in this section yet, it is important to recognise that not all 20 minutes neighbourhoods will have all the facilities, employment, education and services needed for locals. To access these and link with friends and family, locals will need to travel between 20 minute neighbourhoods, distances often out of bike or walking range, and this is when sustainable public transport comes in. 73% of all public transport journeys in Scotland are made by bus. Travel hubs and bus prioritisation options will play a key role making sure that active travel and public transport are seamlessly linked. This action must also take into account that any removal of roads will also result in removal of public transport options. We believe if active travel is being specifically mentioned in this section, public transport should be too.

14. Reinvent and future proof city centres

We believe that an important part of city transformation is the development of the mass transit options found within it. People must be able to get around cities to be able to access facilities, services, work, education and family and friends. Many of these journeys will be too far for bike or walking so people will have to choose alternative transport options. Sustainable public transport is key here yet public transport does not have a strong presence in this section. It is our opinion that public transport has to be an important part of any city transformation plan and it has to be mentioned specifically in this section to make sure it is recognised as such.

20. Reimagine development on the urban fringe

We agree with the principles in this section. However, whilst the section talks about rail and active travel, there is no mention of the role that coach can bring to development on urban fringe, especially around tourism and linking urban dwellers with more rural Scotland. The coach industry is a key element of Scottish Tourism and the wider Scottish Economy. Scotland's 300 coach companies directly employ 4,000 people and the industry supports 1.8m tourist



journeys annually, equating to over £850m of value to the Scottish Economy. Coaches regularly transport large numbers of people to Scotland's towns, cities, destinations, attractions, and hotels. The industry plays an essential role in cruise ship tourism, carrying passengers all across the country from their port of arrival. Coach travel is one of the most environmentally sustainable and socially inclusive modes of transport. Over 57% of our domestic passengers are over 55 and, for some, coach holidays are the sole opportunity for travel and offer a much-needed escape from social isolation. Coaches offer safe, door to door travel to Scotland's world class hotels, attractions, destinations, and experiences.

To be able to maximise this sustainable form of travel it is imperative that the right infrastructure (coach parking, facilities for drivers) is installed in key strategic locations across the whole of Scotland.

CPT Scotland would like to see coach specifically recognised in this section as an opportunity to help deliver this action.

21. Improve urban accessibility

CPT Scotland welcomes this action, especially the focus on mass transit options. However, we would like to see specific mention of bus prioritisation measures. Over the last 50 years, bus journey times have increased by almost 50% in the more congested urban areas.⁴ The net result has been a significant decline in bus use from over 13 billion journeys a year in UK to less than 5 billion. This shows a direct correlation between operating speeds and patronage: research has shown that a reduction of 10% in bus speeds is estimated to result in a loss of between 9.6% and 14% in patronage.⁵ Bus prioritisation measures can increase bus speed and reliability which in turn makes it cheaper for operators to run. This in turn reduces fares, increasing bus use even further.

CPT Scotland is asking that bus prioritisation be specifically recognised and mentioned in this section to make sure it is embedded in the framework in the way that we believe it should be to help reduce car use.

Q18: What are your overall views on this proposed national spatial strategy?

CPT Scotland very much welcomes the proposed national spatial strategy. We are particularly pleased to see a focus on sustainable transport options and a push away from the focus on car. We believe that this strategy presents a

⁴ *The Impact Of Congestion On Bus Passengers*, Greener Journeys, 2016- accessed Feb 2022
<https://greenertransportsolutions.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf>

⁵ *Intervention 10 – Reallocation of roadspace for buses*, STPR2, , Transport Scotland, accessed March 2022
<https://www.transport.gov.scot/media/49062/stpr2-phase-1-ast-project-10-bus-priority-3-feb-2021.pdf>



significant opportunity for local authorities to create local plans which will transform how we travel in this country and make use of public transport easier, more convenient and cheaper.

Whilst we welcome the strategy, a familiar theme throughout is that there is a specific focus on active travel, with bus often overlooked, despite being the predominant mode of public transport and an essential service for those that walk, wheel or cycle when circumstances make those options impossible or unappealing. Whilst we appreciate active travel sits on top of the sustainable travel hierarchy, public transport sits just below and has an equally important role to play in reaching our Net Zero goals, priorities set out in the National Transport Strategy and reaching a green Just Transition. Therefore, we would like to see an increased mention/recognition of public transport throughout the document to make sure planners using the framework easily recognise it has an equally important role to play alongside active travel.

Q21: Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?

CPT Scotland believes that Bus Service Improvement Partnerships (BSIPS), funded through the Bus Partnership Fund⁶, and the bus prioritisation measures that come from these should be considered a national development. 73% of all public transport journeys are made by bus in Scotland. 7% of all journeys in Scotland in 2019 were made by bus, less than 1% on bike. Active travel has a clear pathway for the proliferation of active travel measures in the framework. However, bus prioritisation which speed up buses, make them more reliable, reduce fares for passengers and increase sustainable transport alternatives for people only gets a passing mention.

CPT Scotland believes that bus prioritisation measures should be delivered at a strategic level at the same pace, at the same time and with the same priority as active travel measures. Our towns and cities have very limited road space and there needs to be a strategic approach to roadspace reallocation to make sure bus and active travel routes are added in a way which complement each other. They should not be competing for the same road space, yet as it stands in this document active travel will get priority. CPT Scotland is concerned that due to this, road space on strategically important bus routes could be reallocated to active travel rather than bus, causing bus routes across cities to become disjointed. This could increase bus journey times, make buses less reliable, increase fares and reduce options for travellers, all

⁶ *Bus Partnership Fund*, Scottish Government- accessed March 2022 <https://www.transport.gov.scot/public-transport/buses/bus-partnership-fund/>



resulting in less use of sustainable transport options. It is also worth mentioning that before serious sticks in car use demand management can be rolled out, people must have reliable, affordable and convenient alternatives ready to choose from. That is why making sure both active travel and bus prioritisation options are delivered with same speed and strategic importance is paramount. The fact that, in this framework, BSIPs and bus prioritisation measures do not have national development status equal to active travel is of concern.

Policy 1: Plan-led approach to sustainable development

Q23: Do you agree with this policy approach?

Yes. Local authorities should be working with bus operators via Bus Service Improvement Partnerships (BSIPs), to make sure that all bus services and routes can deliver on connecting the right communities together. It will also become imperative for new developments to consult with BSIPs to make sure any new large developments can be viably served by public transport options before acceptance is granted.

Policy 2: Climate emergency

Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

While the policy covers many areas that will address climate emergency, we believe there is not enough mention regarding demand management for car use. If government is serious about reducing car km by 20% it has to be clear what tools local authorities can use to get this done. Only by disincentivising people to use their cars will we realistically see a behaviour change that will lead to modal shift.

It is also worth mentioning that CPT Scotland believes that Scottish Government has to ensure that national targets are reflected in local plans. Local Authorities have to be held accountable to this framework and we want to see more regarding how this will be done in the document.

Policy 7: Local living (20 minute neighbourhoods)

Q29: Do you agree that this policy sufficiently addresses the need to support local living?

As per the answer in Q15. Whilst we broadly agree with the premise of 20 minute neighbourhoods it is very clear that the specific prioritisation of public



travel is sorely missing. Active travel is specifically mentioned yet it is important to recognise that not all 20 minute neighbourhoods will have all the facilities, employment, education and services needed for locals. This is particularly true in rural areas where the delivery of services and extent of local infrastructure may not necessarily be supported by the surrounding density of population. To access these and link with friends and family, locals will need to travel between 20 minute neighbourhoods, distances often out of bike or walking range, and this is when sustainable public transport comes in. 73% of all public transport journeys in Scotland are made by bus. Travel hubs and bus prioritisation options will play a key role in 20 minute neighbourhoods making sure that active travel and public transport are seamlessly linked. This action must also take into account that any removal of roads to vehicles will also result in removal of public transport options. It is important public transport has a prominent mention in this policy

Policy 8: Infrastructure First

Q30: Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure first approach to planning?

CPT Scotland broadly supports this policy. However, we believe that bus prioritisation infrastructure should be delivered at a strategic level at the same pace, at the same time and with the same priority as active travel measures. Our towns and cities have very limited road space and there needs to be a strategic approach to roadspace reallocation to make sure bus and active travel routes are added in a way which complement each other. They should not be competing for the same road space, yet as it stands in this document active travel will get priority. CPT Scotland is concerned that due to this road space on strategically important bus routes could be reallocated to active travel rather than bus, causing bus routes across cities to become disjointed. This could increase bus journey times, make buses less reliable, increase fares and reduce options for travellers, all resulting in less use of sustainable transport options. It is also worth mentioning that before we can introduce serious sticks to get people out of their car, people must have reliable, affordable and convenient alternatives ready to choose from.

Policy 10: Sustainable transport

Q32: Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

Yes. We very much welcome the content in Policy 10. Prioritising public transport over car in planning will mean developers and local authority decision makers will have to specifically take public transport provision into



consideration. This should ensure that people will have a choice when it comes to travel and having a convenient, affordable and reliable sustainable alternative to a car on their doorstep will help modal shift. We also hope this will highlight the effectiveness of Bus Service Improvement Partnerships (BSIPs) which will be imperative in making sure local authorities, developers and bus operators are working together on delivering bus networks which are needed and viable.

There is, however, one section where we have specific concern. In section (i) of Policy 10 the following is noted:

- the need to as far as possible facilitate access by reliable public transport, ideally supporting the use of existing services **or new services that do not require on-going public sector funding.**

We would like to highlight that every registered bus service in Scotland receives on-going public sector funding. The money that government invests in buses directly benefits passengers, not the operators. Ongoing government support invested in bus comes in the form of the [Bus Service Operators Grant](#) (BSOG) (Soon to be [Network Support Grant](#) (NSG)) and supported services for local authorities. These tranches all have one thing in common- making fares cheaper for passengers and keeping less used routes operating. All registered bus routes benefit from BSOG funding. Therefore, CPT Scotland would like the highlighted line in bullet point above removed from the document or amended to reflect the likely intention that a service may receive some local authority support initially until it is commercially viable to operate.

Policy 17: Sustainable tourism

Q38: Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our netzero and nature commitments?

Yes. We also believe that coaches should be specifically mentioned in this section as they play a vital role in the sustainable tourism.

The coach industry is a key element of Scottish Tourism and the wider Scottish Economy. Scotland's 300 coach companies directly employ 4,000 people and the industry supports 1.8m tourist journeys annually, equating to over £850m of value to the Scottish Economy. Coaches regularly transport large numbers of people to Scotland's towns, cities, destinations, attractions, and hotels. The industry plays an essential role in cruise ship tourism, carrying passengers all across the country from their port of arrival.



Coach travel is also one of the most environmentally sustainable and socially inclusive modes of transport. Over 57% of our domestic passengers are over 55 and, for some, coach holidays are the sole opportunity for travel and offer a much-needed escape from social isolation. Coaches offer safe, door to door travel to Scotland's world class hotels, attractions, destinations, and experiences.

A resilient Scottish coach industry would be well placed to support the sustainable tourism recovery outlined by the Scottish Government and is keen to do so. A thriving and prosperous coach industry should be a central plank of Scotland's plans to recover from the Covid-19 pandemic and contribute to building back the hard-hit tourism sector in all corners of Scotland.

Policies 24 to 27: Distinctive places (City, town, commercial and local centres)

Q45: Do you agree that these policies will ensure Scotland's places will support low carbon urban living?

Yes. We are pleased that public transport is recognised in this section, albeit in passing. However, we believe more emphasis on the provision and prioritisation of public transport should be highlighted. Bus plays an integral role in connecting different parts of cities together and towns to cities. This opens up affordable, convenient and reliable access to city and town centres from further afield, opening up access to jobs, education, facilities and services. Whilst we appreciate the focus on increasing active travel options in these policy areas, we would like public transport to have equal importance and focus as many journeys people take will be too far to cycle or walk, and real affordable and sustainable alternatives to a car are needed.

Q54: Do you agree with our proposed priorities for the delivery of the spatial strategy?

Yes. CPT Scotland agrees in principle with the proposed priorities. However, we would like to note our concern with available resources for local authorities to deliver on the strategy. Due to central government real term cuts, over the last decade or so, Local Authorities have trimmed down their capacity and skill banks almost to the bone. This may mean that some local authorities will not have the requisite number or expertise within staff teams to deliver on the strategy. It is unlikely that most local authorities will manage to deliver on this strategy in full without a substantial increase in their block grant, so they can reinvest in building back the capacity and skill sets lost over the last few years. Without this it is likely that only easy, non-transformational, parts of the strategy will be delivered, leaving the ultimate aims of NPF4 unmet.



Q55: Do you have any other comments on the delivery of the spatial strategy?

CPT Scotland believes that public transport, especially bus and coach, have a vital role to play in transforming the way we move around our towns and cities in a sustainable way and how we all access our everyday needs.

Whilst we very much welcome the introduction of prioritisation of sustainable transport in the planning framework, we believe there is a focus on active travel to the detriment of those that cannot not to walk, wheel or cycle. We accept active travel sits atop the sustainable travel hierarchy and certainly we support the introduction of active travel measures across Scotland to help tackle the use of cars. However, public transport sits just below active travel in the sustainable transport hierarchy, and we have to be careful the proliferation of active travel measures is done in partnership with the requirements needed for public transport. This is especially the case when it comes to buses and coach as local authorities start the difficult decisions of reallocation of very limited road space to both active travel and bus prioritisation. We would like to see public transport highlighted more throughout this document so that planners and local authority officers recognise that bus and coach have an equally important part to play in spatial planning. There has to be a clear understanding that both active travel and bus prioritisation has to happen together in partnership, concurrently, and with same priority. We do not believe this spatial plan does this. Without this synergy embedded in the strategy we risk two parts of the sustainable travel hierarchy competing against each other, when we all want to work together to reach the same ultimate goal - reducing car use, making our streets cleaner, and safer and helping to tackle the climate emergency we are living in.

Further Information

Website <https://www.cpt-uk.org/>

Twitter: [@CPT_Scot](https://twitter.com/CPT_Scot)

Contact

Andrew Lindsay

Public Affairs Manager
CPT Scotland

Mobile: 07867 637128

Email: andrew.lindsay@cpt-uk.org