



28<sup>th</sup> Feb 2018

## **CPT RESPONSE TO THE DRAFT LONDON PLAN**

**The Confederation of Passenger Transport UK is the trade association of the bus and coach industry, representing over 1000 operators including large bus and coach companies and numerous SME companies.**

### **Introduction**

**As an industry, we welcome any balanced proposal which will enhance the Capital, making it more attractive and appealing to Londoners and visitors alike. It is without question that there are Improvements which can be addressed and CPT fully supports these broader aims.**

As an introduction, we would wish to highlight the substantial contribution made to the Capital's public transport network made by our members. As well as the substantial contribution to the TfL Red Bus network, coaches operated by our members provide links from the capital to a huge number of destinations around the UK, Many operate from areas which are poorly served by rail and for which there are no viable alternatives, practically or economically.

The tourist coach industry is an integral part of London's transport infrastructure, providing travel links, particularly for groups and those with impaired or restricted mobility, and those who have particular needs requiring special attention, children or those for whom English isn't their first language for instance, all of which supports the Capital's tourism and commerce.

### **Coaches and the London Economy**

Greater London is jointly Europe's most densely populated city - 8.6 million – and is totally reliant on efficient logistics which deliver the people and goods which keep the Capital moving.

In order to fully confirm the contribution tourist coaches make to the London economy, CPT commissioned renowned transport consultant, Steer Davies Gleave to produce a report on the benefits of coach tourism to the London economy, this revealed that:

- Coaches carry around 13m tourists to London annually
- Those customers contribute a spend in the region of £1.3bn annually



Key areas where coaches contribute to London :

- A substantial proportion of London Theatre customers arrive by coach.
- Coaches are the most practical and popular means of transporting groups of vulnerable individuals into and around London, particularly the elderly, the young and those for whom English is not their first language.
- Around 75% of school groups visiting Theatres, museums and other attractions arrive by coach.
- Coaches have impressive environmental credentials; emissions across all elements per passenger/ km are among the lowest of any mode of road transport and they reduce the road space occupied per passenger by around 70% compared with taxis or private cars.
- Typically a EuroVI bus or coach has NOx emission levels comparable to many private cars of similar age.
- Coaches also provide the vital logistical links for a huge number of visitors who arrive by air - principally through the four main London airports - and also by sea via the cruise ship terminals at Dover, Tilbury, Harwich and Southampton which are totally reliant on coaches to maintain the tight schedules which are essential if cruise lines are to be able continue to include London in European itineraries.

London's population is set to grow to over 10 million over the next 25 years which will challenge the capital's transport infrastructure even further so moving people with the minimum emissions and use of road space is a pre-requisite.

### ***Policy GG1 - Building strong and inclusive communities***

Inclusive options for practical and affordable transport will serve to promote opportunities for all. The TfL bus network is well catered for as an integral part of London's Transport infrastructure but other modes such as coaches and minibuses are less well recognised, despite providing travel for educational, employment and leisure purposes to groups of all ages and social backgrounds. Consideration of this in all areas of planning and development would encourage what is widely regarded as one of the safest and most environmentally friendly modes of travel and help to promote social inclusion and the community activities they cater for.



### ***Policy GG2 - Making the best use of land***

CPT fully supports the most effective use of land and would urge an approach to planning which requires scrutiny of plans and enshrines the requirement that all developments consider the most appropriate modes of transport applicable to it and ensure these are accommodated within the proposal.

Hotels and leisure developments currently have little compulsion to consider how guests will travel to them or to provide for this in their plans. This results in difficulties, particularly for coaches bringing groups, where little or no provision has been made as a result of there being minimal requirement to consider this aspect. As coaches are the preferred and most suitable mode of travel for groups travelling to this type of development, it seems only sensible that consideration of this and provision should be mandatory.

Typically, but not exclusively, the nature of developments where group travel should be a mandatory consideration are:

- Schools, colleges and training establishments
- Leisure developments such as sports facilities.
- Tourist and heritage attractions.
- Hotels
- Entertainment and hospitality venues
- Commercial or industrial property where there is potential to offer commuting opportunities which discourage private car use.

CPT welcomes the prioritising of brown field sites to unlock further development opportunities, but we would urge recognition of and safeguarding of the logistical function which many of these sites currently serve as a condition of future proposals. This maximises the value and function of the land and ensures the benefits continue to be available to London.

### ***Policy E4 Land for industry, logistics and services to support London's economic function***

CPT would wish to highlight the major issues which both the freight and passenger transport sectors face when competing for land with both industry and residential development. We would advocate that the sectors requirements, essential for the modern commercial, industrial, tourism and residential functions to operate, are prioritised in planning and safeguards in place to ensure they can continue to do so when developments are complete. All too often such safeguards have been shown to be too weak and are lost in the often lengthy development processes.



### ***Policy SD4 - The Central Activities Zone (CAZ)***

CPT supports recognition of the challenges presented by limited availability of industrial and logistics capacity, resulting from the high-value land market within the central zone. We also support the requirement for plans and development decisions to take account of the supply and demand for industrial and related use, including distribution, infrastructure maintenance, construction and waste management. We would urge that this extends to passenger use in addition to the focus on freight.

### ***Policy HC2 – World Heritage Sites***

Recognition of London's world heritage sites is welcome and as treasures which should be accessible to the greatest number of people, and from the widest range of cultural and economic backgrounds, we would encourage protections which ensure that they are able to reach these using the most practical and economic means. Coaches provide practical and economic transport for countless thousands of visitors to these and other London attractions every day and we would urge wider recognition of this and stronger safeguards which allow the full benefits to be retained and developed.

### ***Policy HC5 - Supporting London's culture and creative industries***

Similarly London's world renowned culture and performing arts should be available to all and CPT would urge that the same safeguards as those advocated for heritage sites are in place to ensure access for groups to these centres and events.

### ***Policy T1 - Strategic approach to transport***

The principles of consolidation and integration for freight, to encourage more efficient use of road space is welcome, and CPT would support exploring a similar approach to group travel in the central area in particular.

### ***Policy T3 - Transport capacity, connectivity and safeguarding***

Safeguarding of transport links and infrastructure is to be welcomed and we would urge that this is strengthened to specifically include coaches and minibuses within the scope of public transport.

### ***Policy T5 - Cycling***

London's roads are undergoing a transformation to accommodate demand for cycling and subsequent reallocation of road space to cycling infrastructure. Whilst CPT supports this in principle, it is essential that a balanced approach achieves the needs of different road users, maximising the efficient use of limited road space.



Plans for any new segregated routes must consider access to the kerbside for set-down and pick-up for passenger vehicles and should not reduce overall the amount of parking and layover space essential to ensure the legal requirements for drivers rest periods can be met.

The initial programme segregated Cycle Superhighway routes constructed during the previous Mayoral term failed to live up the promise of like for like replacement where any facilities were lost. It also appeared to consider other users only after cycling had achieved priority. This left inadequate time and a lack of resource to adequately address other needs. The increase to journey times, both during the construction phase and following completion, resulted in an increase in the number of vehicles required to maintain service levels. This not only increased cost, it further contributed to congestion and increasing emissions.

CPT would appeal to the Mayor to consider the whole aspect of road use in future schemes.

### ***Policy T6 – Car parking***

This sets out sensible policy on car parking but CPT would urge that essential parking for commercial use receives greater recognition and is specifically prioritised over car parking.

### ***Policy T6.3 - Retail parking***

CPT would encourage coach parking to be provided in retail locations of any significant size and which could benefit from attracting group visits by coach. A number such as Westfield already provide facilities which are available to outside users and supplements the overall stock of parking.

### ***Policy T6.4 - Hotel and leisure uses parking***

Entirely sensible though this is, CPT would urge that it is strengthened by making it a specific requirement of planning for any development. We would specifically recommend that the nominated developments which are likely to include group visits have a statutory requirement to cater for coaches and provide facilities in line with the size of the building. This should extend beyond the view of the developer and be included as part of the appraisal of the planning authority who should consider the needs of users and be held accountable for the decisions.

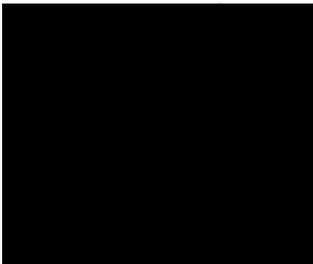


***Policy T8 - Aviation***

Aviation plays an important role in the movement of visitors, many high spending and who contribute substantially to the economy. CPT has no particular view on how expansion to accommodate growing demand for air travel should be accommodated but we do recognise that growth is inevitable and urge that all modes of public transport are accommodated and indeed protections are in place to ensure this, in particular coaches for group travel and scheduled services

CPT are of course available to discuss any aspect of the proposals, the consultation and our response and we look forward to hearing from you further regarding this draft.

Kind regards



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