### Our response to the Department for Transport's 'Plan for Drivers'

Following the Department for Transport's recent publication of 'The Plan for Drivers', the Transport Planning Society (TPS) offers its full response below.

### **About the Transport Planning Society**

The Transport Planning Society (TPS) is the only professional body focusing exclusively on transport planning in the UK. It represents the views of almost 1500 individual members and 40 stakeholder members. The aim of the Society is to raise the profile of transport planning, be the voice of transport planners, influence policy and chart a course for the profession at a time of unprecedented change and challenge.

#### Introduction

The 'Plan for Drivers' outlines how the Government will support drivers and additional measures to improve public transport and active travel. We are pleased to see the Government remain committed to investing in improving public transport and active travel options and emphasise the importance of giving people more choice and freedom about how they travel.

However, the Plan also states that the increasing uptake of electric vehicles (EVs) and battery electric vehicles (BEVs) means that traffic management strategies and policies that negatively affect drivers are not successful and have left drivers feeling "under attack".<sup>1</sup>

We are concerned by the framing of policies that support public transport and active travel as inherently anti-car and an "attack" on the rights of drivers. The TPS believes that such measures are not "aggressively anti-driver" but progressively pro-people and pro-increasing choice.

These measures provide all road users, including car owners and users, more freedom to choose how they travel, by providing practical, cheaper and more sustainable options. Without these measures, we risk being over reliant on just one transport mode, restricting people's ability to choose how they travel.

We believe the 'Plan for Drivers' underestimates the extent to which the current operation of the transport system in many parts of the country means that the "choice" to use a car is not an effective choice – it is the <u>only</u> choice. Additionally, while EVs are part of the solution to decarbonise transport, they still contribute to congestion in our towns and cities and adversely affect local air quality through tyre and brake dust. Alongside electrification, we need to

<sup>&</sup>lt;sup>1</sup> Department for Transport. (2023) 'The Plan for Drivers'. Pg 4. [The plan for drivers (publishing.service.gov.uk)]

<sup>&</sup>lt;sup>2</sup> Department for Transport. (2023) 'The Plan for Drivers'. Pg 4. [The plan for drivers (publishing.service.gov.uk)

implement long-term traffic reduction targets by providing meaningful alternatives to car use for a much higher proportion of the population.

#### The need for a national transport strategy

There are positive policies for many areas of transport, including the Transport Decarbonisation Plan, Bus Back Better and Gear Change. But these policies are not fully "joined up". We believe that instead of the current piecemeal approach, the introduction of a single National Transport Strategy for England, that joins up with the devolved nations' transport strategies, is more necessary than ever. One clear framework for transport would allow more efficient and effective decision making to happen at pace, across all levels of Government. By incorporating all modes of transport, a National Transport Strategy would realise the full benefits of a connected, integrated network, which encourages multi-modal travel.

The Plan for Drivers outlines 30 new steps the Government will take to support drivers and we have responded to the key points below.

#### **Buses and bus lanes**

Two of the thirty points outlined focus on bus lanes. The first of them will ensure bus lanes are only in use when they are needed, by operating only when buses are running or when traffic is heavy enough to delay buses. The second will make better use of bus lanes by allowing motorcycles to use them and launching a consultation on whether motorcycle access should be standard.<sup>3</sup>

On the first point, we agree that maintaining bus lanes after bus service hours may not be the best use of road space. However, the practicality of only operating bus lanes when traffic is heavy enough to delay buses is unclear. For instance, how and at what point would bus lanes "turn on", and how specifically would this benefit motorists as buses are not the main cause of congestion on our roads.

We welcome the Department for Transport consulting on whether motorcycles should be able to access bus lanes as standard, but want to emphasise that due consideration is needed of the safety and other implications of this. It is worth noting that Transport for London conducted a similar review which concluded motorbikes could use all bus lanes on the Transport for London Road Network and some other roads, although each London Borough has its own rules on motorbikes using bus lanes.<sup>4</sup> Allowing motorbikes to use bus lanes could deter cyclists from

<sup>&</sup>lt;sup>3</sup> Department for Transport. (2023) 'The Plan for Drivers'. Pg 9. [The plan for drivers (publishing.service.gov.uk)]

<sup>&</sup>lt;sup>4</sup> Transport for London. (2023) 'Motorcycling in London'. [https://tfl.gov.uk/travel-information/safety/road-safety-advice/motorcycling-in-london]

using bus lanes, and motorbikes exiting bus lanes at bus stops, where buses are idling, can be dangerous and contribute to additional traffic of cars giving way.

However, we believe the unreliability of buses is a much greater issue than the ability to drive in bus lanes. The frequency and reliability of bus services are critical determinants on their attractiveness to current and potential users. Buses are the most popular mode of transport for the most vulnerable groups spanning age, income levels and ethnicity. For example, 17-29 year olds make the most public transport trips out of all age groups, meaning they are disproportionately affected by reduced and unreliable bus services. A National Transport Strategy incorporating the very welcome National Bus Strategy (2021), should be implemented to ensure bus services are secure, reliable and accessible for those who rely on them.

### 20mph speed limits

The 'Plan for Drivers' announced an update to 20mph zone guidance for England to "prevent inappropriate blanket use". The Plan also references how the recent introduction of 20mph speed limits in all residential areas in Wales has bought attention to the issues drivers are facing. It is important to note that even in Wales, 20mph zones have not been applied across all road types and it is a mischaracterisation to infer they have been.

We welcome the 'Plan for Drivers' highlighting how 20mph zones are an important tool in improving road safety in residential areas. Introduced, 20mph zones would replace 30mph zones where traffic already needs to be slower due to high levels of walking and cycling. Currently, we see some residential roads include short sections of 20mph zones for areas of high walking and cycling activity, such as outside schools. This creates inconsistency and safety issues switching from 30mph to 20mph and then back to 30mph again. The introduction of 20mph speed limits on some residential roads would provide a clearer approach for drivers, and improve safety for vulnerable road users such as people walking, cyclists and children.

Evidence from countries such as Spain (which implemented a speed limit of 30kmph, approx. 20mph, in 2021 across most of its urban roads) showed 20% fewer urban road deaths, with fatalities reduced by 34% for cyclists and 24% for pedestrians. Reducing the speed limit on residential roads is an effective tool to reduce the severity of road incidents if applied correctly.

Furthermore, the "20's Plenty" campaign found that out of 61 English authorities to introduce 20mph speed limits, not one has been overturned. This shows that once 20mph speed limits

<sup>&</sup>lt;sup>5</sup> Department for Transport. (2023). 'National Travel Survey Statistics'. [nts0601.ods (live.com)]

<sup>&</sup>lt;sup>6</sup> Department for Transport. (2023) 'The Plan for Drivers'. Pg 10. [The plan for drivers (publishing.service.gov.uk)]

<sup>&</sup>lt;sup>7</sup> Welsh Government. (2023). 'Spain's message to Wales on lower speed limits days ahead of 20mph roll out'. [https://www.gov.wales/spains-message-wales-lower-speed-limits-days-ahead-20mph-roll-out]

<sup>&</sup>lt;sup>8</sup> 20 is Plenty for Us. (2023). '20mph Places'. [20mph Places - 20's Plenty for Us (20splenty.org)]

have been implemented, people experience the benefits of safer and quieter roads, and do not want to return to higher and more dangerous speed limits.

An effective National Transport Strategy would accurately reflect this data and consider the criteria for where 20mph zones could best be implemented. However, we fundamentally agree with the importance of ensuring "local consent" and carrying out continued engagement with communities before and after the issuing of 20mph zones.

#### 15 minute cities

Another step announced in the Plan aims to stop Local Authorities using 15 minute cities "to police people's lives". <sup>9</sup> We are concerned by the characteristics attributed to 15 minute cities in the Plan. This feeds into wider misunderstanding about the purpose of the schemes and creates further confusion on how they operate in practice. We also believe the term 15 minute city is being used interchangeably with the concept of Low Traffic Neighbourhoods, which is unhelpful.

The concept of a 15 minute city or neighbourhood refers to the idea of having all the necessary amenities, including schools, medical services, shops and other essential daily services, within walking or cycling distance. This gives residents the option to walk or cycle to local services without relying on a car. In areas with 15 minute neighbourhoods, individuals are free to choose how they travel wherever they like. The focus is on increasing sustainable transport options available to all residents. 15 minute cities intend to bring essential services closer to people's doors to give people more transport options, tackle congestion, improve air quality and reduce overall carbon emissions.

We are particularly concerned about the presentation of these schemes as measures to control or police people's activities and choices. Rather, they should be viewed as a measure to <u>increase</u> the freedom of everyone to have real choices of where they access essential services and how they can travel there.

We also believe traffic management strategies are not inherently detrimental to drivers. All residents including car owners and users will benefit from increased travel options, cheaper costs, and reduced traffic and congestion on our roads.

We understand enabling active travel and road safety measures can cause frustration to the public if they are not delivered well. Therefore, we strongly believe early and continued engagement with the local community is vital to deliver these measures effectively while maintaining public support.

<sup>&</sup>lt;sup>9</sup> Department for Transport. (2023) 'The Plan for Drivers'. Pg 10. [The plan for drivers (publishing.service.gov.uk)]

We hope the Department for Transport meaningfully engages with transport sector stakeholders and the public on 15 minute cities, and takes account of all feedback received.

#### **DVLA** data

The 'Plan for Drivers' proposes restricting Local Authorities access to DVLA databases for traffic management enforcement as part of the measure to stop local authorities implementing 15 minute cities. We are concerned this could be very detrimental to the fair implementation of nuanced, 'smart' city schemes.

'Smart' city schemes help reduce road traffic without the need for physical road barriers like bollards or planters. However, Local Authorities rely on having access to the DVLA database to ensure 'blanket approaches' are minimised and to enable them to make nuanced decisions. This is to support many residents' genuine desire to reduce growing levels of traffic on residential roads without necessarily disadvantaging those who may rely on their cars, such as blue badge holders.

Furthermore, removing Local Authorities' access to DVLA databases may also impact the enforceability of the School Streets initiative which is a popular and successful road danger reduction intervention, designed especially to protect children.

We are concerned by the proposal to restrict Local Authorities' access to DVLA databases without due consideration of how this could impact the proportionate and fair implementation of other successful and popular local traffic management schemes.

We believe a National Transport Strategy must, at its core, ensure the ability of residents and Local Authorities to choose and implement the traffic reduction measures that work for them in their area.

### **Electric Vehicles and Greener Schools**

Another step announced by the Department for Transport is to encourage 'greener schools' by providing dedicated, targeted support for schools to install electric vehicle (EV) chargepoints, through allocating money from existing grants. While we welcome measures to encourage the installation of EV chargepoints and improve EV infrastructure across the UK, we believe transitioning to EVs is only part of the solution, especially for the school run.

The biggest challenges schools and nearby residents face are the high levels of congestion, noise and increased emissions attributed to school drop-off and pick-up. Transitioning to EVs can help reduce some of the noise and emissions, but they do not improve congestion in the areas around schools, which are often residential.

We believe a more effective measure to encourage greener schools is supporting and growing walk and cycle to school programmes and the existing School Streets initiative. One effective programme is Living Streets' Walk to School Challenge which is a student-led initiative to enable children to switch to active travel.

The School Streets initiative only operates at school drop-off and pick-up times and works by implementing temporary traffic restrictions on the road outside a school. Research commissioned by The Road Safety Trust and undertaken by Sustrans found School Streets have led to overall drops in traffic volume and no significant traffic displacement to surrounding streets.<sup>10</sup>

School Streets are a widely popular measure resulting in a safer and cleaner environment which in turn encourages more pupils and their families to walk, wheel or cycle to school. Pilot schemes from across the country found School Streets resulted in an increase from 23% to 65% in active travel journeys. <sup>11</sup> Measures to encourage pupils and families to take up active travel for school journeys would be more effective in creating 'greener schools', and in reducing all the issues caused by high levels of motorised traffic.

### **Low Traffic Neighbourhoods**

The 'Plan for Drivers' proposes new guidance for LTNs to focus on ensuring local support for the schemes prior to their implementation, and to consider how to address existing LTNs that may not have local consent.

Low Traffic Neighbourhoods aim to reduce through traffic in residential areas to reduce the number of motorised vehicles and increase walking and cycling. The schemes also aim to improve safety by reducing road collisions and reduce noise and air pollution. They minimise traffic using different methods including bollards, planters, and occasionally automatic number plate recognition cameras, to stop access to cars while allowing people walking and cycling to go through. Some are also designed to allow public transport and emergency service vehicles to access the roads when needed.

We believe LTNs can be a useful tool to manage traffic demand and reprioritise road space if and when used appropriately. However, we agree that working with local communities to design their own schemes to reflect and improve their locality is the right approach. We understand this hasn't been the case with all LTNs, but we hope the Government's review will be balanced, with the communities' views heard.

 <sup>&</sup>lt;sup>10</sup> The Road Safety Trust. (2022). 'School Streets success improving road safety around schools'.
[https://www.roadsafetytrust.org.uk/news/school-streets-success-improving-road-safety-around-schools]
<sup>11</sup> Croydon Council website. 'Why Healthy School Streets are being implemented.'
[https://www.croydon.gov.uk/healthy-school-streets/why-healthy-school-streets-are-being-implemented]

### **Parking**

The Plan also covers parking, with three of the 30 recommendations established to help make parking easier. The Plan proposes specific plans to implement better parking technology to put an end to multiple parking apps. It also proposes a consultation on revising guidance for the public to challenge Local Authorities on unfair parking and make parking rules more readily available.

The justification for these proposals in the Plan is to remove annoyances that irritate many drivers by making "parking less of a headache". <sup>12</sup> As parking is rarely free, we believe any parking policy should be aimed at making parking fairer rather than simply easier.

We would also urge the Government to consider the interests of people who walk and cycle as well as public transport users in discussions over parking (for example pavement parking and parking in cycle lanes and bus lanes). This highlights the need for a National Transport Strategy to review all modes holistically, to ensure any new parking policy is not detrimental to people walking or cycling, or to our national targets to increase the uptake of active travel and public transport.

The TPS is developing a parking policy statement which will be published shortly. This will detail 18 recommendations to create fairer parking policies while encouraging the uptake of public transport and active travel.

#### Conclusion

We welcome the 'Plan for Drivers' recognition of public transport and active travel as vital to give people more choice in how they travel. We are also pleased that a number of the proposed measures will be based on public consultation and engagement, which is the cornerstone of any robust transport strategy. Local communities deciding which transportation initiatives suit their needs is the best way forward, as they are best placed to assess what is needed locally.

However, we are concerned to see the lack of commitment to create a shift to walking, cycling and public transport necessary to promote healthier and more sustainable forms of transport and reduced social and environmental impacts.

The traffic management strategies criticised in the 'Plan for Drivers' are not anti-motorist but pro-people. We strongly believe these measures will play a vital role in reducing congestion,

<sup>&</sup>lt;sup>12</sup> Department for Transport. (2023) 'The Plan for Drivers'. Pg 5. [The plan for drivers (publishing.service.gov.uk)]

pollution and emissions, offering people more travel options and freedom, while increasing the safety of our streets for all road users.

To deliver these measures we are calling for an integrated National Transport Strategy for England, that joins up with the devolved nations' transport strategies, to establish a guiding framework for decision-makers to reprioritise all road users, not just car owners and users.

We hope the Department for Transport meaningfully engages with the full range of transport sector stakeholders and the wider public on these proposals to ensure a fully balanced approach is taken forward.