# Backing<br/>Britain's<br/>CoachesCpt





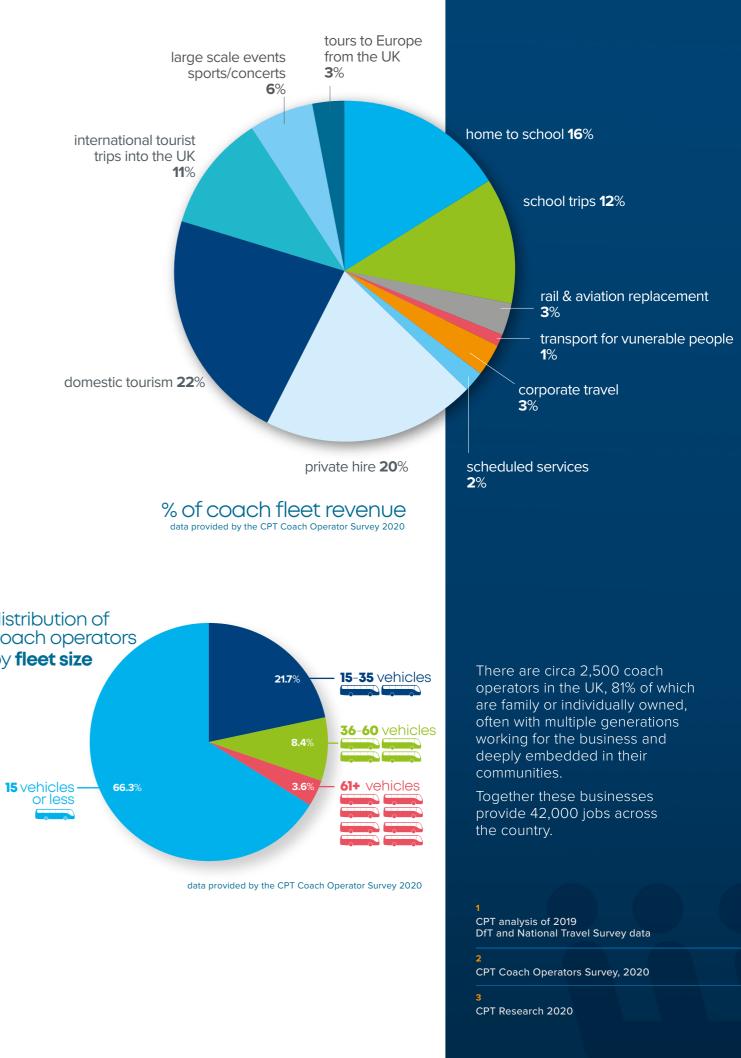
## A coach strategy for Britain Introduction

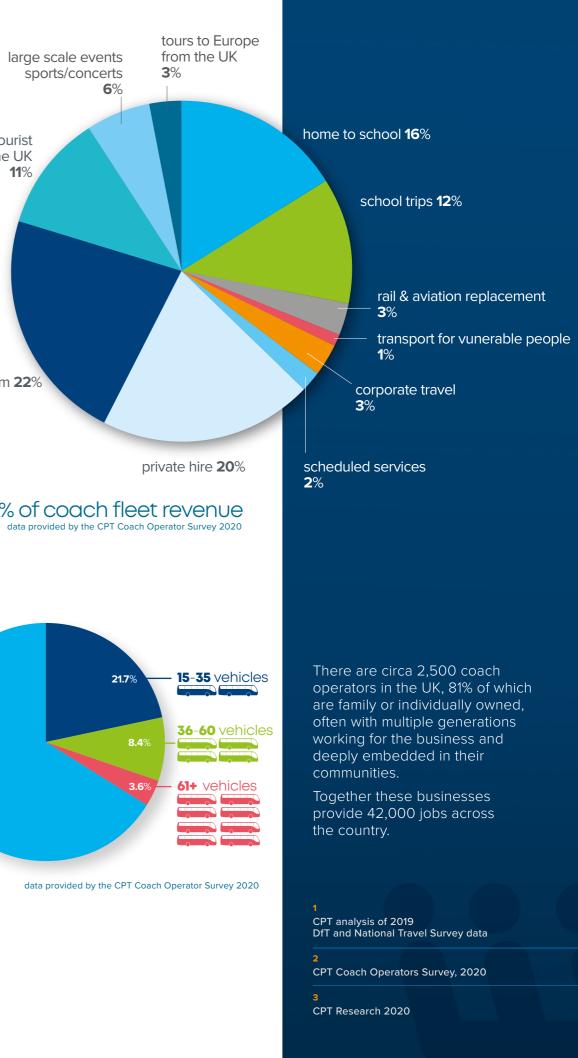
• oaches provide a vital, comfortable, and environmentally sustainable travel option, and help those who might otherwise struggle to travel.

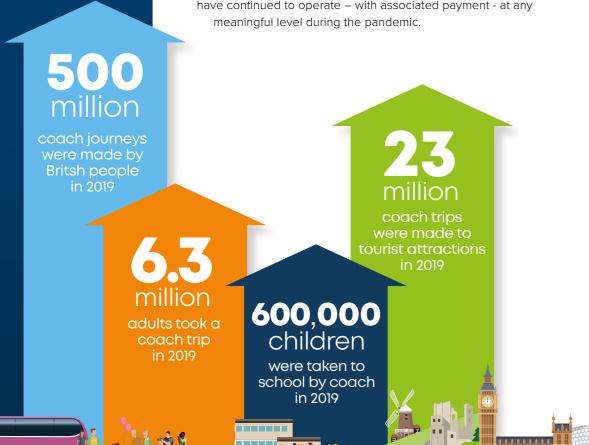
They transport huge numbers of passengers around the UK – pre-pandemic British people made an estimated 500 million passenger journeys by coach in the UK each year.<sup>1</sup> Of the 6.3 million people who took a coach trip in 2019, 40% were 55 years old or older.<sup>2</sup> They also transport around 600,000 children to school each day. This demonstrates the importance of this convenient and accessible form of transport in helping people access holidays, education and combatting social exclusion. Coach also plays an important role in supporting the UK's tourism industry; in 2019 there were 23 million visits to tourist attractions and locations by coach, which contributed £14 billion to the UK economy.<sup>3</sup>

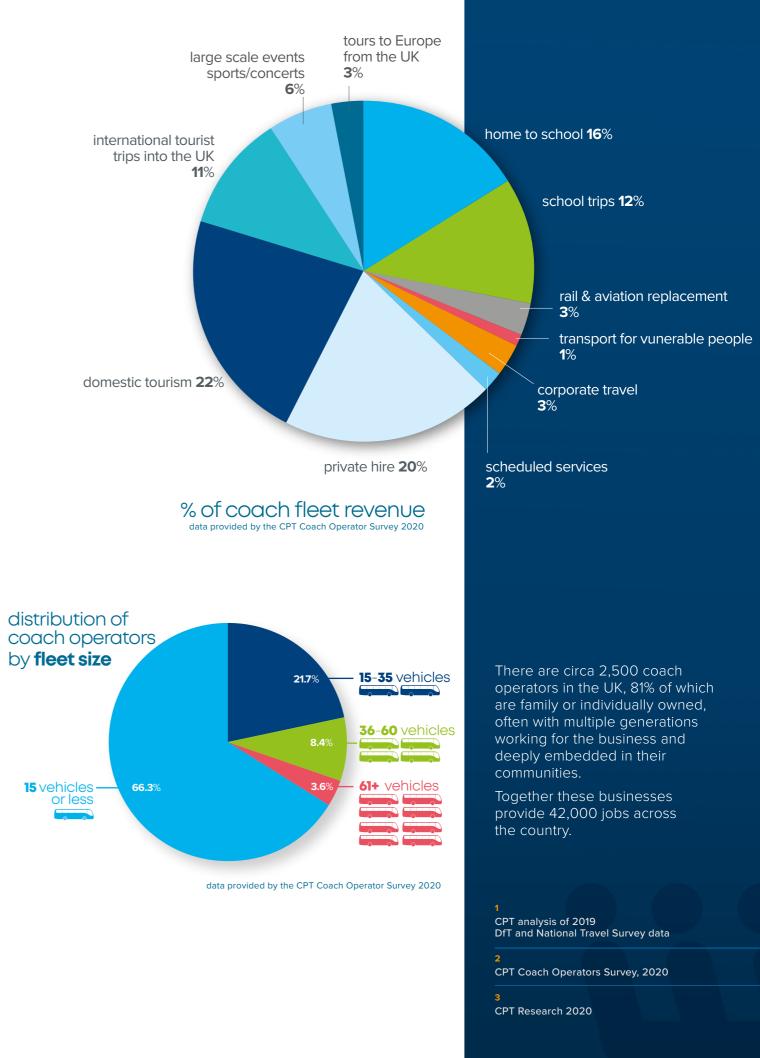
Coach provides a multitude of services to ensure people can get to where they need to go, including rail replacement during engineering works, aviation support, vulnerable group transport, such as elderly, children and people with disabilities and trips to sporting events.

However, only home to school and rail/aviation replacement services have continued to operate - with associated payment - at any meaningful level during the pandemic.









# A day in the life of a coach operator

To give a flavour of what coach operators deliver across Britain every day, here are a few examples of a typical day in 2019 for some of our coach operators.

00



## Operator B Home to school transport • Manages 43 different home to school/college routes utilising 31 vehicles and drivers every term-time morning and afternoon • Carries 5,600 passengers per day to or from school & college, equating to over a million student journeys each year • Home to school services covered nearly 600,000km in 2019 • Saved 65 times the carbon monoxide emissions compared to students travelling by car (based on two students per car) **Tourism** • Carried some 38,000 passengers on local sightseeing tours. Tours start every 20 minutes in the high season with a hop-on-hop-off service along the route enabling passengers to visit a wide range of attractions. • 346 coach trips for cruises that arrived at the local port, carrying nearly 14,000 people into the local area who spent around £140,000 during their visit. • Ran 200 tours around the UK and Ireland carrying just over 4,700 passengers. Tours last an average of five days and four nights, contributing considerable income to the domestic tourist economy. A door-to-door pick up service on these tours assists elderly passengers that would otherwise feel unable to travel and helps to tackle social isolation. Operator also offers a reunion trip which allows passengers to meet up with the friends they made on previous holidays.

## Other



- Carried out 63 trips, carrying over 3,000 students, for educational purposes ranging from museum trips to European city and ski holidays.
- 50 private hires a week, including rail replacement services. Without a coach operator ready to fill these replacements, there may be upwards of

100 passengers stranded at a station at any one time.





• Private hire work includes taking the local football team and staff to all their away matches, carrying out an important community service and taking cars off the road, reducing congestion and emissions.





 $\odot$ 

DfT (September 2019) Reported road casualties in Great Britain: 2018 annual report, fatality rates data per billion passenger miles by road user type

## Covid-19 pandemic

The pandemic has hit the coach industry hard; 80% of operators have seen their turnover reduce by over 50%, and almost 20% of operators have seen theirs reduce by over 90%, a devastating impact on an industry that is normally fundamentally healthy and profitable. Despite the many support packages that have been made available to other sectors, the coach industry has been largely overlooked; the furlough scheme has been welcome, however many operators have struggled to access the support packages made available to the leisure and hospitality industry and, despite being an integral part of the UK's leisure and tourism industry, only around 20% of coach operators have been successful in accessing the bespoke support offered to that sector<sup>5</sup> (which is largely left to the discretion of local authorities).

With the right support the coach industry can recover so it can continue to play a vital role in delivering the country's environmental, economic, and social goals.

## The future

coach

cars

off the road

can keep up to

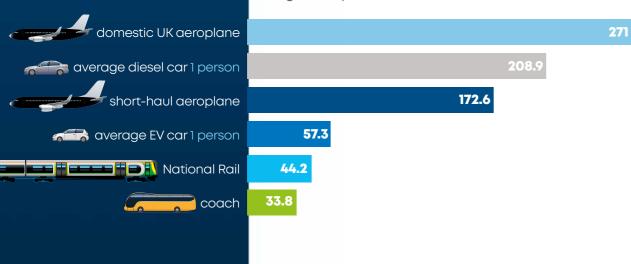
The need to address air quality and the climate emergency has risen to the forefront of public and political consciousness. Given the Government's legally-binding commitment to net zero emissions by 2050 and the poor air quality in many towns and cities it is essential we modify our travel patterns across the country to significantly improve

our air quality and reduce our carbon footprint.

Thankfully, one solution lies ready and waiting in the form of the coach; the latest Euro VI diesel coaches emit less nitrogen oxides per vehicle than the latest diesel cars, and just one

coach-load of people can keep up to 50 cars off the roads, with average carbon dioxide emissions per passenger per journey being around 1.5 times lower than rail, 5 times lower than air and 6 times lower than car travel.

greenhouse gas emissions per passenger kilometre (g C02e/pass km)<sup>6</sup>



This document sets out the value of coach travel to Britain both today and in a sustainable future. It identifies the actions that need to be taken, in particular by central and local government, to enable the industry to recover from the Covid-19 pandemic and get back to delivering a service that truly meets the needs of individuals, the economy, society, and the environment in the 21st century.



The Confederation of Passenger Transport (CPT) UK represents the operators of bus and coach services across the UK, as well as vehicle manufacturers and other suppliers to the industry.

CPT has more than one thousand enterprises in membership, ranging from major PLCs, through to municipally-owned companies and family businesses with fewer than ten vehicles.





#### DfT member survey 2020

#### 6

Zemo Partnership test data and DBEIS Greenhouse gas reporting: conversion factors 2020 gov.uk/government/publications/ greenhouse-gas-reporting-conversionfactors-2020

## Executive summary

Coach travel is an inclusive, sustainable, environmentally friendly travel option that reduces air pollution, carbon emissions and road congestion.

It provides an accessible and inclusive travel option that operates 24 hours a day, 7 days a week, transports passengers to jobs that may be at hard-to-reach locations or start and finish at odd hours.

It is able to deliver flexible and fast emergency responses when rail and airline services experience unplanned disruptions.



t is absolutely crucial for the UK's long-term environmental targets and economic recovery that the importance of coach travel is recognised.

But the sector has been hit hard by Covid-19. Operators are doing all they can to stay afloat during the pandemic, but with bookings not expected to return to pre-pandemic levels for several months, perhaps not until 2022 at the earliest, and little financial support from Government, the industry is struggling. It is vital that Government recognises the huge contribution that coach travel makes to the UK and provides the necessary support to ensure that the sector can bounce back from the pandemic and play its part in delivering a green, inclusive economic recovery.

CPT is committed to working with its members and Government as we exit the pandemic to raise the profile of coach travel as a desirable option for individual passengers, local areas, and society as a whole. For the coach industry to deliver its full potential we need Government to commit to providing a coach-friendly operating environment. This means:

### Enabling the sector to bounce back from the devastating impact of the Covid-19 pandemic by:

- UK and Welsh Governments following the lead of the Scottish Government and introducing a per vehicle grant-based scheme for coach operators as suggested by CPT at the start of the pandemic
- Ensuring the sector has access to any support provided to the rest of the leisure and tourism sector, given its vital role to the UK tourism economy
- Government to honour its pledge from September 2020 to extend repayment terms for those who have a Coronavirus Business Interruption Loan and to work with commercial lenders to allow greater flexibility in finance repayments so no operator will have to pay back a loan until they have had the opportunity to see business return
- Promoting coach travel, at both national and local level, to both passengers and locations to enable it to play its part in reviving tourism and the economy
- Encouraging the return of educational trips by coach
- Coach facilities and access forming an integral part of the planning process for locations likely to receive large numbers of visitors
- Certainty over expectations over the Public Service Vehicle Access Regulations (PSVAR) to allow coach operators as much time as possible to ensure their fleet is ready and able to comply with requirements and grants to help with the cost of retrofit

- Government working with industry on a national strategy for sustainable long-distance road transport. This should include:
  - Requirements to ensure that clean air strategies are fair and reasonable for coaches and support modal shift from the private car to sustainable forms of mass transport; in particular that all Clean Air/Low Emission Zones include cars
  - A national fund to support coach operators to invest in new vehicles or retrofit to meet Clean Air/Low Emission Zone requirements and, over the longer term, invest in ultra-low and zero emission coaches
  - Support for the development of infrastructure associated with ultra-low and zero emission coach fleet
- Provision of suitable flat, stable areas with adequate space to deploy a wheelchair lift to enable coaches complying with the Public Service Vehicle Accessible Regulations to provide services for the disabled, particularly where this is mandatory
- Supporting the coach industry to secure a steady supply of good quality drivers including by reducing the minimum age at which an unrestricted driving licence can be held

## If Government works with the coach sector the benefits to Britain could be huge.

We estimate that just a 15% increase in coach passenger journeys<sup>7</sup> by British people each year could lead to approximately 47 million fewer cars on the road, saving over a guarter of a million tonnes of carbon dioxide and significantly reducing congestion.

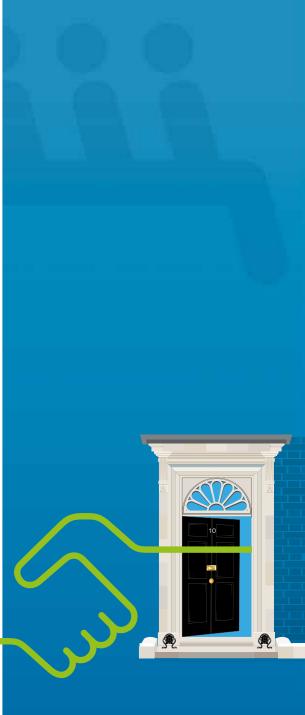
Through improvements to the coach fleet we can reduce carbon dioxide emissions even further - by around 56,000 tonnes over the next decade and reduce emissions of nitrogen oxides by enough to equate to £225 million in damage cost savings.

By reducing congestion we can improve journey times and connectivity across the country for everyone.

By reducing traffic on the roads we can improve safety.

By supporting the growth of the coach sector we can support the delivery of VisitBritain's ambitions to attract 49 million more visits and £35 billion more tourism spending by 2025

We urge local, regional, and national government to work with us to deliver the improvements set out in this strategy and deliver a coach industry fit for the 21st Century and beyond.



Based on 2019 figures and CPT analysis of DfT and National Travel Survey data





# Covid-19 pandemic

he Covid-19 pandemic has had a devastating impact on the coach sector and lockdowns, travel guidance and current social distancing measures continue to place coach operators under considerable financial strain. Even when the lockdown measures were eased in 2020, which enabled the wider tourism sector to start to reopen, the market conditions for the coach industry, the requirement for social distancing, lockdown tiers, travel restrictions and group restrictions continued to inhibit operators' ability to operate without incurring significant financial losses. Many family-run businesses which were fundamentally healthy and profitable pre-pandemic experienced more than an 80% drop in income for 2020 – with almost 20% of operators seeing a reduction of over 90%. The Coronavirus Job Retention Scheme has covered one of the operators' main costs, however the other main cost of vehicle finance has fallen between the cracks. The prospect of going out of business is now becoming very real.

Despite being a central part of the UK tourism sector and contributing £14 billion to the UK tourism economy a year, only 20% of coach operators in England have been successful in accessing the support available to the leisure industry. There has been a bit more success in Wales, where some operators have been supported through the Welsh Government's Economic Resilience fund, however even access to this scheme has been variable.

> Whilst the Coronavirus Job Retention Scheme (CJRS) has been enormously helpful, even with all staff furloughed and its doors closed the average coach company faces around £1,900 in standing costs per day (at c. £83 per coach) and refunding customers in the early part of the pandemic for cancelled tours

has left coach operators with severely depleted cash reserves with no revenue coming in for the foreseeable future.

Even as lockdown is eased, the short to medium term outlook for the coach industry continues to look challenging: continued suppression of parts of the economy and society as well as social distancing requirements will make it impossible to operate commercially viable services, at least until the social distance review in June. The leisure and tourism sector are likely to be the last to return to business as usual.



Despite this, the coach sector has been once again overlooked when it comes to the provision of Restart Grants made available to other parts of the hospitality and leisure sector. This is despite the fact that coach tourism has been brought to a halt as a result of the pandemic and that supporting the industry to get back on its feet would play an important part in revitalising the rest of the UK's tourism sector.

As we move to restart the country's economy, we will want to bring tourists back into the country, get people back in our hotels, theatres, shops, restaurants, cafes, and bars, reinstate educational trips and help those who have been forced to spend a considerable length of time in isolation get back out and about, as well as getting people to school and work. The coach industry has a vital role to play and so it is crucial that the sector is able to withstand the current crisis.

The Scottish and Northern Irish governments have acknowledged and understood the difficulties coach operators are facing and have put forward bespoke coach support packages. It is essential that both the UK and Welsh governments take stock and follow suit for England and Wales.

# Northern Ireland support for coach

Northern Ireland was the first to confirm a support package for coach operators; a £19 million support fund was made available to support taxi drivers and private coach and bus operators. The first round of support was announced in October 2020 and £5 million was distributed on a per vehicle basis to private coach and bus operators who had been severely hit by the pandemic. Payments to eligible operators were £8,000 for the first vehicle and £4,450 for subsequent vehicles, with a cap of £100,000. A second round of funding was opened by the infrastructure minister on the 12 March, it will provide grants for overheads and expenses incurred between 1 October 2020 and 31 March 2021.

## Scotland Coach Support Fund

Following their continued engagement over the past year with VisitScotland, Scottish Government and directly with the Cabinet Secretary for Rural Economy and Tourism, CPT Scotland successfully lobbied for a fund to support coach operators who have been severely affected by the Covid-19 pandemic and were successful in increasing the amount available from an initial £5 million to £10 million.

Initially, operators received up to  $\pounds150,000$  in funding which was awarded on a per coach basis, tiered by Euro Standard:

## • Euro VI vehicles up to £12,000 per qualifying vehicle

## Euro V vehicles up to £9,000 per qualifying vehicle

The above rates were reduced by 50% for vehicles with less than 25 seats.













£100-£150

million

needed to support

coach sector

## What we need from government Sector specific grants

UK Government needs to take action similar to that taken in other parts of the UK to support the coach industry in England and Wales. A per coach grant, along the lines of the Northern Ireland and Scottish models, would help to cover the standing costs faced by operators and help operators get back up and running again as lockdown is eased and the economy reopens.

Our calculations suggest that, if all coaches are eligible, a per coach figure along the lines of that available in Northern Ireland would be appropriate (equating to roughly three months' worth of standing costs). If Government decided to make the scheme more targeted – along the lines of the Scottish model, the higher per coach figure would be appropriate to acknowledge the increased costs associated with newer vehicles and the fact that these newer vehicles are less likely to have received any home to school income during the pandemic.

We think that Government would need to allocate between £100-£150 million to make a meaningful difference to the sector, recognising the essential role of coaches and ensuring a level playing field for all operators across the UK. By supporting the coach sector out of the pandemic, Government can ensure that best value is delivered from the money already spent on furlough, rather than it simply deferring the date at which a number of coach operators go out of business.

HM Treasury to help financial institutions take a longer-term view of the coach industry's prospects when considering lending, finance holidays and personal guarantees- and to extend repayment terms for the Covid-19 Coronavirus Business Interruption Loan Scheme

Operators have faced months of high costs with little or no income and limited access to support. If finance holidays were extended by 12 months, or the government covered the interest payments on these loans for 12 months which is estimated to cost £85 million, this would ensure that no coaches are repossessed in the short term and businesses will be ready to bounce back as soon as restrictions allow. In September 2020 Government announced that businesses who had secured a Coronavirus Business Interruption Loan (CBIL) or Bounce Back Loan would have their repayment term extended from 5 years to 10 years.

It was later confirmed in February 2021 that the payback period for the Bounce Back Loans would be extended from 5 years to 10 years, with applicants able to move to interest-only repayments for a period of 6 months and with the option to pause repayments for a period of 6 months. However, there has been no confirmation that the same extension will be applied to businesses with CBILS. We urge government to honour their pledge from September 2020 and extend the repayment terms for the CBILS. The pandemic has lasted longer than hoped when the loans were first put in place, and so the coach industry, along with many other industries, will not be able to recover as quickly as was originally envisaged. The extension will provide more certainty over their future.

It is also essential that lenders and financial institutions take a longer-term view when considering applications for future loans. Operators are concerned that having Covid-related loans on their finance history will stand against them when applying for finance in the future. It is essential that financial institutions recognise these were

exceptional circumstances.



The coach industry is fundamentally healthy and profitable and we have every expectation that it will be able to return to its pre pandemic, business as usual state provided it is given the support needed to ensure its survival now.

## Provide full and fair access to the grants and support available to other parts of the leisure industry

Despite delivering 10% of the value of UK tourism the Government has failed to give the coach sector consistent access to the support provided to the leisure and tourism industry. It has often been left to local authorities to decide whether to provide support to coach operators on a case-by-case basis.

Formal recognition from Government in the guidance that accompanies support for leisure and tourism businesses that coach operators should be granted access to these funds would help to end the postcode lottery of support.







## Promoting coach travel and coach friendly attractions

Coaches can help revive the tourist economy, when it is safe to do so, and deliver much needed footfall to attractions and places across the UK. The Covid-19 pandemic has caused many tourist attractions to close their doors to coach trips, resulting in many people unable to enjoy a day out and a negative impact on local economies.

As we exit lockdown and the restrictions are eased, enabling tourist locations to reopen, it is essential that as many places as possible can welcome coach trips and tours. Government at central and local level has a major role to play in encouraging people to visit destinations once it is possible to do so and make it clear that travelling by coach is a good way to travel - safe and convenient for the passenger, and cutting down on congestion and parking WELCOME issues, as well as reducing air pollution and carbon emissions that would arise from multiple car trips. Local authorities can also help by working with tourist attractions and locations and encouraging them to accept coach trips.

## Home to school transport

The coach industry also operates home to school transport and many operators who provide these services have been doing so throughout the pandemic, sometimes at a loss (even when schools were closed to the majority of students, they remained open to vulnerable and key worker children who needed transport to school). Home to school only forms 20% of the coach sectors' income, however it requires 40% of the coach fleet to deliver. Operators are normally able to keep rates for home to school services low by scheduling other work during the day around these home to school services to support their income. The pandemic has put a stop to this other work, making it increasingly difficult for operators to cover home to school running costs.

In addition, funding made available by Government to supplement registered bus services that carry large numbers of school children and which were at risk of over-crowding during the pandemic has largely been utilised by incumbent bus operators, having minimal impact on the coach sector.

While demand for tourism and other work remains low, we urge government at national and local level to be sympathetic to the difficulties faced by coach operators in covering their costs while other work is suspended and to consider providing top up payments for contracts that are at risk during this difficult time.

## Encourage the return of school trips

Both overseas and UK-based school travel has been brought to a complete halt due to the pandemic. Coach operators who provide these school trips have been unable to operate since March 2020 when the UK entered its first lockdown and there is currently no date for when these trips are expected to resume.

Approximately 560,000\* students undertake an overseas school residential trip each year in normal times, and more than 1 million students will have missed out on these opportunities by the time school trips are re-instated.<sup>8</sup> Many thousands more undertake day and residential trips in the UK. 89% of schools view residentials as extremely or very important to students and the school itself, and 94% of schools ran a residential trip during the 2018/19 academic year.9 These trips provide essential learning and experiences for school children and it is vital that we do not lose these as measures are eased and schools are able to reopen. We are asking government to allow and encourage schools to start planning for trips, both in the UK and internationally, and to address the current lack of Covid-19 insurance for these travel

options so these trips can be part of children's catch-up programme.

\*overseas trips only, does not include the thousands of pupils undertaking residentials in the UK.

If the coach sector is given the support it urgently needs to survive the pandemic, the industry can help government deliver its ambitious economic and environmental targets whilst also supporting an inclusive society.





— coaches



## Future beyond Covid-19: delivering economic recovery

• oach travel can play a vital role in the UK's economic recovery from Covid-19. Before the pandemic, domestic and international visitors travelling by coach contributed over £14 billion to the British economy each year, with 23 million visits to tourist attractions and places made by coach in 2019. Coaches are an attractive travel option for international visitors, with 46% reportedly nervous about driving in Britain.<sup>10</sup>

Stately homes, gardens and theme parks report that, at certain times of the year, more than half of their visitors arrive by coach,<sup>11</sup> and coaches transport huge numbers of people to and from sporting and entertainment events; in 2019 more than 68,000 passengers (accounting for nearly 40% of festival-goers) were transported to Glastonbury by coach from cities as far afield as Penzance and Dundee, with 880 passengers per hour

being transported in the peak period.

VisitBritain published a five-year strategy in early 2020 with the goal of attracting 49 million overseas visitors, which is expected to generate £35 billion in revenue by 2025.<sup>12</sup> Coach can provide an attractive, convenient, sustainable, and flexible way for these visitors to travel the country.

These are not the only developments that can benefit from good coach facilities. Coaches also offer an efficient mode of transport for visitors to hotels and airports, and employees to industrial and commercial developments. It is vital that these places provide coach friendly access and facilities so that these journeys can be made more efficient for passengers but also to encourage more people to use them.

## What we need from government

Coach facilities and access should be an integral part of the planning process for locations that are expected to receive a large volume of visitors.

It is essential that local authorities ensure they make appropriate provision for coach travel in order for it to assist in the economic revival of local areas. Coach friendly access and facilities need to be embedded in decision making and new development planning at a local level. Local authorities may be unaware of the value of coach travel to their area and we would like to work with them to address that. Annex A provides an example checklist for new developments to ensure that provision for coach visitors is considered.

We would urge UK, Welsh, and Scottish Governments to endorse Annex A as a tool that can assist developers and local authorities in planning new developments. These considerations for coach should be included as a priority in the Planning Policy Wales, statutory guidance for Welsh LPAs under the 2015 Planning (Wales) Act, the Planning (Scotland) Act 2019 and the forthcoming Scottish National Planning Framework 4, and in any future reform of National Planning Policy and guidance in England.

Government should also consider coach provision when assessing bids for transport funding.

We recognise the importance of good relationships between coach operators, local authorities and residents and the need for coach drivers to act responsibly. Our members are committed to following best practice to secure their good reputation, including switching engines off when stationary, parking in designated coach parking areas where available (and paying the appropriate charge) and avoiding obstruction of traffic. CPT will continue to work with operators to develop and encourage best practice.

VisitBritain: Foresight Issue 117, In BEIS & DCMS (28 June 2019) Policy Paper: gov.uk/government/publications/tourism-sector-deal/tourism-sector-deal#fn:24

68.000

festival goers

travelled to

Glastonbury

in 2019

by **coach** 

Coach Tourism Association achholiday.com/why-travel-by-

VisitBritain & VisitEngland (February 2020) Our five- year strategy: 2020-2025

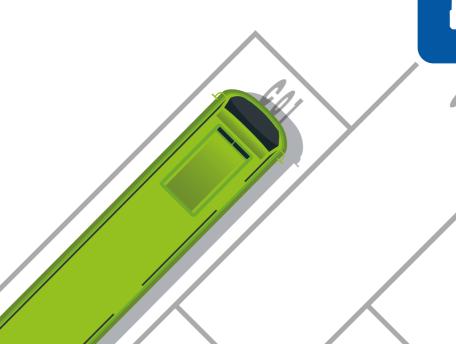
transport.gov.scot/media/4589/ planning\_reform\_-\_dpmtag\_development\_management\_\_dpmtag\_ ref\_\_17\_\_-\_transport\_assessment\_ guidance\_final\_-\_june\_2012.pdf

gov.wales/sites/default/files/ publications/2019-02/planning-policy-. wales-edition-10.pdf

## The problem

Despite the fact that planning policy and guidance in England, Scotland <sup>13</sup> and Wales<sup>14</sup> recognises the importance of provision for sustainable transport in new developments, the value of coach travel and the benefits it can provide for reducing air pollution and traffic are not always fully recognised.

Coach travel to visitor attractions is frequently hampered by poor access, lack of suitable drop-off/pick up points, lack of coach parking and general coach facilities. This can lead to increased car use, with associated congestion, car parking and air pollution issues, which can result in visitor numbers being restricted.







## Government should be proactive in promoting a positive coach message to get people back on board

Coach can deliver much needed footfall to attractions and locations across the UK, as and when lockdown restrictions are eased. It is vital government takes a proactive role in encouraging people to visit these destinations once it is possible to do so and highlights the economic and environmental benefits of coach travel. This will be particularly important as we exit the Covid-19 pandemic as Government messaging to avoid public transport could otherwise have a lasting impact on the way the public views the whole range of mass transport options, including coach travel.

An increase in coach passenger journeys by just 15% a year could significantly reduce the amount of cars on the road - by approximately 47 million - which could save over a quarter of a million tonnes of carbon dioxide and significantly reduce congestion.

## Road pricing targeted at encouraging a shift from private car to coach travel (and to other public transport)

Coach travel is cheaper than running a car; if more visibility was given to the costs of coach vs the cost of a private car, more passengers may be persuaded to leave their cars at home and choose a more sustainable travel option such as coach.

If Government switched from the current system of charging people for the fuel they use to charging them for using the roads in specific places during specific times, this would decrease the incentives for private car use and make more sustainable options, like coaches, more desirable.

We propose that vehicles such as coaches which solve the problems of congestion and pollution should be exempt from any road user charge. This will encourage the shift to more sustainable and environmentally friendly forms of transport and ensure that affordable methods of transport are available, including for those passengers that have no other option. The charging structure should be transparent so that people are able to compare the (largely invisible) cost of a journey by car with the cost of the same journey by coach.



15%

increase

in coach passenger

journeys

million

less cars on

the road

## The examples of the benefits that a coach-friendly approach can bring

Places that have recognised the value of coach facilities have reaped the benefits:

## Beamish Museum

The North East region's most popular paid-for attraction which offers:

- Free coach parking next to the entrance
- · Free admission for coach drivers
- Coach driver hospitality
- · Dedicated signage for coaches
- · Discounted admission for pre-booked groups

It welcomed 747,651 visitors in 2016, up 11% on 2015, with visitors in December up 38% on the previous year, and more than double 2008 figures.

Over half of visitors are tourists, nearly all of whom stay overnight in the region and visit other local cultural and heritage sites.

In 2016 the attraction employed over 430 people.







# Wembley Stadium

The Stadium has recently opened a new coach park with capacity for 290 coaches. For just one event this could enable 13,050 passengers to be brought by coach, taking around 6,500 cars off the road. \*

\*based on 45 passengers per coach and two passengers per car

## Inverness

In 2011 CPT Scotland were contacted by Highland Council about coach parking issues in the City of Inverness:

- There was a steady increase of cruise ships arriving into the nearby Port of Invergordon being met by coaches who took tourists to see the local sites, including the city
- The city lacked sufficient coach drop-off points leading to a prevalence of illegal parking and blocking of bus bays
- Flood prevention works were due to start along the River Ness which would remove a number of potential coach parking locations, further exasperating issues

CPT worked with the Highland Council team to find a solution.

In 2013 12 coach parking bays were installed in Ardross Street with time restrictions to meet residents' and local business' concerns.

In late 2014 the Business Improvement District and the Highland Council part-funded a summertime coaching ambassador and assistants for weekends/cruise days who met the coaches, briefed drivers on parking rules and welcomed the guests.

During the summer of 2017, the ambassadors reported a 45% increase in coach visits with over 2,300 coaches visiting the city. Over the summer of 2019 Coach Ambassadors welcomed visitors from almost 3,000 coaches equating to over 130,000 people.

## Oxford

Tourist visits generated £988 million for Oxford in 2019 and the city council has acknowledged the important role that coaches play in bringing tourists to the city by allocating £20,000 from its 2021/2022 draft budget to develop a coach drop-off and parking strategy for the city. The proposal forms part of Oxford City Council's wider investment plans to help Oxford's visitor

# Bury Market

Bury Market is the biggest market in the North, with over 350 stalls open on Wednesdays, Fridays, and Saturdays in non-pandemic times.

A coach-friendly attraction, it offers:

- Coach drop off adjacent to the open market
- Coach drivers' rest room
- Free coach parking
- £5 coach driver meal vouchers

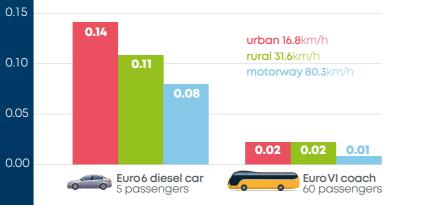
The number of coaches visiting increased by over 40% between 2008 and 2018. The market now attracts over 76,500 visitors who travel by coach every year with regular visits from Birmingham, Carlisle, Durham, North Yorkshire, and Wales.



## Future beyond Covid-19: delivering environmental goals

Reduced levels of congestion on our roads during the pandemic have led to an improvement in air quality – at the height of lockdown Manchester reported a 70% reduction in emissions of nitrogen oxides (NOx), a reduction in carbon emissions and quicker, more efficient road speeds. As we exit the pandemic and restart the economy there is an opportunity to reset travel trends and create new sustainable travel habits. Coaches provide a viable solution that will aid in our economic growth and significantly reduce our emissions.

Coach travel is already one of the most sustainable and environmentally friendly forms of transport, with average carbon dioxide emissions per passenger per journey being around 1.5 times higher for rail, 5 times higher for air and 6 times higher for car travel.<sup>15</sup> With the latest Euro VI coaches emitting less NOx per vehicle than the latest diesel cars, just one coach-load of people - which can keep on up to 50 cars off the roads - amounts to notable savings in carbon and NOx emissions. We estimate that just a 15% increase in coach passenger journeys by British people each year could lead to approximately 47 million fewer cars on the road,<sup>16</sup> saving over a quarter of a million tonnes of carbon dioxide and significantly reducing congestion on our roads. Coaches are therefore part of the solution to the problem of climate change, with buses and coaches together currently contributing only 3% of domestic transport emissions of carbon dioxide whilst cars contribute two-thirds.<sup>17</sup>



comparison of NOx emissions between a diesel car and coach on grams per passenger km travelled

ŐZ

15

BEIS/Defra greenhouse gas conversion factors 2019

#### 16

Based on 500m passenger journeys made by British people by coach each year pre-pandemic

#### 17

Department for Transport (July 2019) Carbon offsetting in transport: A call for evidence

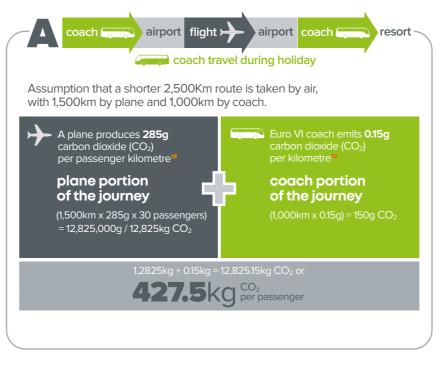
# Modelled Euro VI diesel NOx emissions using average speeds of the Zemo Partnership UK coach cycle, grams NOx per passenger kilometre travelled at 100% vehicle occupancy coach compared to 5 passengers in a diesel car (COPERT 5 model)

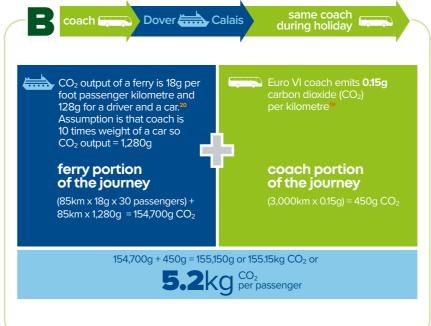
Nevertheless, the industry wants to go even further. In 2020 National Express announced a bold and ambitious plan to have a fully zero emission UK coach fleet from 2035. The rest of the coach industry is keen to move in the same direction but it faces many challenges, many of which are set out below and which have been further compounded by the Covid-19 pandemic which has had a severe detrimental impact on many operators' ability to invest in new vehicles or retrofit options. The pace of change for the industry as a whole is therefore likely to be slower; our ambition is to have an ultra-low or zero emission coach fleet across Britain by 2040.

# Comparison of an educational trip abroad



A school trip abroad lasting seven days, with 30 students. Two options for travel:





## European Environment Agency data

#### 19

EMEP/EEA Exhaust emissions for buses and coaches 2016

20 BEIS



In order to improve local air quality, many local authorities are required to develop clean air strategies and introducing a Clean Air Zone is one of the governments proposed methods. Vehicles entering the specified area must be a minimum Euro VI standard. Local authorities determine the boundaries of the Clean Air Zone and decide which vehicles will be required to meet the engine standards by picking from a range of specified 'classes' of zone. Any non-compliant vehicles will need to pay a charge in order to enter the zone. In Wales, the Clean Air Framework is less prescriptive in that it does not specify 'classes' but does have the same minimum emission requirements.

A large number of Clean Air Zone<sup>21</sup> strategies in England and Wales propose to charge coaches entering the zone but not cars. However, we are pleased to see that some Clean Air Zone proposals, such as Birmingham, are targeting all vehicles, including cars. We are supportive of this and would encourage other local authorities who need to implement a Clean Air Zone to do the same. Strategies that propose to charge coaches but not cars fail to tackle the root cause of the problem, penalise those who opt for a more sustainable transport solution and threaten the future viability of this sustainable, inclusive mode of travel.

## Scotland's Low Emission Zones

Whilst the vehicle emission standards are the same for England and Wales, Scotland's Low Emission Zones differ in that they are a ban and not a charge on non-compliant vehicles. Coach operators who operate anything older than a Euro VI diesel vehicle will be unable to access the zones and will receive a penalty charge notice if they do so.

ONE

## Cost of retrofit solutions

Whilst funding has been made available for bus operators affected by Clean Air Zones to upgrade their fleet to comply with the new requirements, the same cannot be said for coach operators nationwide. In England and Wales, it is left to the local area to decide what support to provide and to whom, with many choosing not to offer support to coach operators that may travel regularly into their area.

In Scotland, whilst coach operators were able to bid for funding from the Bus Emissions Abatement Retrofit (BEAR) programme, priority over available funds was always likely to be given to bus and scheduled coach services, with coach tour/private hire operators likely to miss out. This may be at least partly due to difficulty in determining eligibility; many coach operators who might run frequent services into a Clean Air Zone/ Low Emission Zone may not be based within the local authority area and it may be difficult to confirm the extent to which they will be affected by the requirements.

The fact that many coach operators and services do not fit neatly within defined geographical boundaries means they fall between the cracks when it comes to securing funding allocated by local authorities. With such operators facing the huge costs associated either with retrofit, new vehicles or a daily charge, this puts vast numbers of coach services at risk, particularly given the devastating impact that the pandemic has had on many operators' available capital for investment. Some operators may choose to cease running services into the Zone; some may have no choice but to pass on the increased cost to the passenger. This would lead to less opportunities for passengers to travel by coach and would result in an increase in car journeys or the exclusion of those who have no other option which would have a negative impact on the local economy.



LOWEMISS

21

£££

NOx

CO

NOx

The equivalent in Scotland is a Low Emission Zone. For the purposes of this document, the terms 'Clean Air Zone' and 'Low Emission Zone' are treated as interchangeable.

## Cost and availability of new, ultra-low and zero emission vehicles

Some manufacturers have begun to develop ultra-low and zero emission capable coaches to help in the fight against climate change. There are two manufacturers offering electric coaches with a range of between 200 and 300km, a hybrid model is being trialled in the UK and both Compressed Natural Gas and Liquefied Natural Gas models are available. Whilst these developments are great news for the industry, range, infrastructure, and reliability are concerns for operators.

> If we are to make the transition to ultra-low or zero emission coaches a reality, support from Government is needed to ensure the continued development of adequate technology.

In addition, the cost of ultra-low and zero emission coaches is currently considerably more – we estimate around 75% more - than the latest Euro VI diesel vehicles. Until prices progressively align, support for the increased purchase cost from government is likely to be needed for many operators to invest – particularly in the aftermath of the pandemic.

# FLiXBUS

At the end of 2019 Flixbus began an electric coach service on the 150km route between Paris and Amiens. The coaches recharge at each destination. However, they cancelled an electric route in Germany due to a number of breakdowns and lack of technical support.

They are also investigating the potential of hydrogen coaches with manufacturers.

# national express

National Express in 2020 announced their ambition to have fully zero emission UK coach fleets from 2035, with a target for the first electric coaches to be in service from 2021. Unfortunately, due to the pandemic, they were unable to run their planned in-service trial of an electric coach on their Stansted Airport service, but they were able to run a pre-trial test from Stansted to London Stratford with non fare-paying customers on board. This year they plan to launch a procurement process to find a partner to help them develop their next generation coach fleet and, despite the impact of Covid-19, are still fully committed to their ambition for their UK bus and coach fleets to be fully zero emission from 2030 and 2035 retrospectively.

National Express is the UK's largest operator of scheduled coach services, running over 1,800 services to more than 540 cities and towns every day. In 2019, they provided journeys to over 21 million passengers.

## Cost and location of infrastructure associated with ultra-low and zero emission coach fleet

It is estimated that an electric charging point would cost between **£20,000** and **£35,000**, plus the associated infrastructure costs which would vary depending on the site. This adds significant cost to the investment in electric vehicles.

There will also be many services for which current battery ranges are not sufficient to return to the coach depot before charging is required. There will be similar issues around the charging infrastructure for other alternative fuels. Until appropriate charging infrastructure is available across the country, it is not viable for many coach operators, especially those operating longer distance services, to invest in the ultra-low or zero emission coaches that depend upon them.

## What we need from government

It is essential we work with the government on a national strategy for sustainable long-distance road transport. This can provide the policy and funding framework which would provide the certainty that operators and manufacturers need to invest in new technology against a realistic timeframe.

This strategy should include:

## Requirements to ensure that proposals for Clean Air Zones and Low Emission Zones are fair and reasonable for coach operators and promote modal shift from private car to mass transport

We urge the national governments to create a new class of Clean Air Zone/Low Emission Zone that would enable cars to be charged or banned without also targeting coaches (and buses) that provide a more sustainable travel option.

Pending this change, government should revise their guidance to local authorities so that coaches (and buses) are only subject to the emissions standards requirements (or charged where standards are not met) where cars and taxis are also subject to such standards (or charges). This would ensure that clean air strategies are fair and reasonable for coaches and truly tackle the causes of the problem.

## A national clean air fund to support coach operators to invest in new vehicles or retrofit to meet Clean Air Zone requirements

Given the important role that coaches play in supporting the British economy, delivering an inclusive society, and tackling environmental issues, it is essential Government provides the necessary financial support for coach operators affected by Clean Air Zones and Low Emission Zones to either replace or retrofit vehicles to meet the required Euro VI standards, in the same way that widespread support has been available for buses in England 6 and Wales. We recognise that identification of eligible operators is more complicated than for buses, but we do not believe that this is insurmountable and are willing to work with both local and national governments to find a solution. Funding for retrofit would also provide manufacturers with certainty that there will be a market for solutions, thus encouraging them to bring forward a range of options for coaches which is currently lacking. We estimate that £75 million would provide enough support to retrofit all the 5,000 Euro IV and V coaches currently registered in the UK which are well suited for retrofit.



average CO<sub>2</sub> emissions per passenger per journey are around





higher

highe

## Examples of local schemes to support the retrofit of coaches affected by Clean Air Zone/Low Emission Zone requirements.

Whilst these provide welcome support to operators, there remain huge numbers of operators who will be affected by the Zones' requirements but who are unable to access locally provided funding.

Leeds City Council budgeted £2 million for non-scheduled coach and bus operators to help them upgrade their fleets in preparation for the city's Clean Air Zone (CAZ) which was originally scheduled to commence in summer 2020. A grant of up to £16,000 per vehicle was available to operators to purchase a compliant vehicle or retrofit a non-compliant vehicle to bring it up to standard. This support has been so successful that Leeds have now announced plans to scrap their CAZ as it is no longer needed. Even if traffic levels return to normal levels, the CAZ is no longer required due to the significant shift to cleaner vehicles. The council has written to the UK Government asking to use £6.9 million in CAZ funding to continue to offer grants for local businesses to switch to cleaner vehicles.

### Birmingham has established a £10.05 million HGV and coach £10million Birmingham CAZ business

compliance fund to support businesses based in Birmingham or the West Midlands affected by the Birmingham Clean Air Zone to purchase, lease, or retrofit vehicles.

£8.9 million

funding awarded

in 2019/2020

And the second

£2million

Leeds City Council

CAZ upgrade

budget

0.0

The Bus Emissions Abatement Retrofit (BEAR) programme in Scotland supported the cost of retrofit technology for buses and coaches to improve emissions to Euro VI standard or better. It was available to bus and coach operators delivering services within Low Emission Zones or Air Quality Management Areas in Scotland. In 2017/18 the scheme awarded funding to seven operators to retrofit 42 buses and coaches. IN 2018/19 a further eight operators were awarded funding for 124 vehicles. In 2019/20 a further £8.857 million was available for eligible operators.

## Financial assistance to help coach operators invest in ultra-low and zero emission coaches and support for the development of infrastructure associated with these vehicles.

We welcome the Government's commitment to work with all sectors of industry to accelerate the rollout of zero emission vehicles. This support is vital if suitable coach options, with the required further developments in technology, are to come forward in any meaningful number. Furthermore, the cost of ultra-low and zero emission coaches is currently considerably more than the latest Euro VI diesel vehicles. Until prices progressively align, support for the increased purchase cost from government is needed for many operators to invest.

Given the likely need for electric (and other alternative fuel) coaches to recharge or refuel on route or at location, investment by government is also needed in a network of national charging infrastructure.

2-3 hour recharge -00

One coach operator located 200 miles from Heathrow provides a service transporting passengers into Heathrow airport. With a Euro VI coach, the operator can complete a roundtrip with a break of 45 minutes; the current offering of electric vehicles have a range of 200 miles and take between 2-3 hours to recharge, if there is a rapid charge point available. The coach would also require sufficient luggage capacity for its 85 passengers, however electric coaches currently come with reduced luggage capacity, meaning that both range and luggage capacity make electric vehicles currently unsuitable.

Another operator provides a service from Yorkshire to the cruise ships in Southampton, and then completes a return journey for the passengers wanting to travel home. The round trip is in excess of 600 miles. An electric coach would require rapid charge points situated along the strategic road network in order for this journey to be viable.

# 00

## Potential benefits of action from Government

Calculations by Zemo Partnership<sup>22</sup> estimate that around 20% of the coach market – circa 5,000 vehicles – in the UK is Euro IV or V, which are ripe for retrofit to Euro VI. Such retrofitting will result in significant NOx savings; in an urban setting with an average speed of 11mph retrofitting to Euro VI could save between 86-92% of NOx/km. An average retrofit cost of £15,000 per coach equates to £10 expenditure per kg/NOx saved. This compares to an average cost of £105 per kg/ NOx saved through grants for electric cars and a cost of around £175 kg/ NOx saved under the diesel car scrappage scheme.<sup>23</sup>

Based on DEFRA's damage cost saving estimates of £6,199 £/NOx tonne, retrofitting 5,000 Euro IV and V coaches would result in around £45 million damage costs savings annually. Assuming a retrofit system is in place for at least five years, this would equate to £225 million in damage cost savings. 24

We have highlighted the challenges faced by the coach industry in moving towards an ultra-low and zero emission coach fleet. Nonetheless, we recognise the need for all industry sectors to take serious action to tackle the climate emergency. This is why, with the necessary support from Government as described above, we are setting out our ambition to reach an ultra-low or zero emission coach fleet by 2040.

Supporting the coach industry to make the transition to zero emission alternatives will have a substantial impact on the environment and will further reduce the carbon footprint of an already sustainable travel option.

By encouraging Clean Air Zones proposals to target private cars, it places more sustainable travel options such as coaches on a more equal footing and encourages more passengers to use them. As well as helping us to meet our climate change goals, a reduction in congestion will also have a positive impact on the economy and on everyday lives.

0

The Zemo Partnership, established in 2003, is a public-private partnership that exists to accelerate a sustainable shift to lower carbon, cleaner vehicles and fuels and create opportunities for UK businesses.

Zemo Partnership figures based on Professor David Begg for Greener Journeys (2017) Improving air quality in towns and cities: Why buses are an integral part of the solution

24

Figures provided courtesy of Zemo Partnership

## Future beyond Covid-19: supporting an inclusive society

oach travel provides an essential contribution to society with an easily accessible travel alternative to the private car. Coaches make work viable in areas or during hours poorly served by rail; coach operates 24 hours a day seven days a week and can support shift patterns for industries such as airports and airlines.

The coach can be two to three times cheaper than rail travel. This makes it an accessible and inclusive form of transport for those with limited incomes, and the flexible nature of coach travel, with the ability to provide a door-to-door service, opens up opportunities for those who might otherwise be reluctant travellers - for example the elderly, disabled or lone travellers, and helps tackle social isolation.

During the pandemic, many operators have also provided transport to help local authorities support the most vulnerable residents in our society, for example:

- Picking up patients that have been discharged from hospital to take them to a care home
- Collecting medication in a local community for delivery
- Dropping off emergency food parcels to vulnerable families as identified by the local authority
- Transporting people to vaccination centres Alpine Travel in North Wales and Masons Coaches in Buckinghamshire are just two examples of coach operators offering free travel to local residents to vaccination centres

Coaches are already one of the most accessible and inclusive forms of transport. Nonetheless, the industry is committed to going further to make sure that this safe and comfortable form of transport is easily available to everyone.

## **Public Service Vehicle Accessibility Regulations**

The Public Service Vehicle Accessibility Regulations (PSVAR) aim to improve the accessibility of buses and coaches for disabled passengers and we are supportive of this aim. However, there is still a great deal of uncertainty around the regulations, in particular how and when they will be implemented with regards to coaches.

## What we need from government

In order to allow coach operators as much time as possible to ensure their fleet is ready and able to comply with PSVAR requirements we need certainty over expectations.

We have put together and shared with Government a proposal which will enable the coach sector to transform accessibility in a manageable way. For an interim period to reflect the shortfall in the supply of home to school (HTS) services, closed door HTS would be offered a default exemption with the various elements of the proposal, outlined below, providing protection for those intended to benefit from the regulations whilst building capacity towards wider PSVAR provision.

## Our proposal is made up of four elements:

- Any system allowing parents to apply for in scope HTS transport should make clear that children with accessibility needs have the option of travelling on a PSVAR compliant vehicle with their peers.
- A guarantee that any child requiring the facilities of a PSVAR vehicle on an in scope HTS journey would be supplied with a compliant vehicle to travel with their peers.
- All coaches registered from a date to be agreed with Department for Transport would be required to comply with PSVAR standards, regardless of intended use.
- A requirement that services currently contracted with a PSVAR compliant vehicle could not revert to non-compliant operation.

We believe that these proposals would enable children with accessibility needs to travel with their able-bodied peers on in-scope home to school services. Additionally, over time the coach fleet will become accessible, resulting in a better outcome than under the current regulations. This will enable passengers with accessibility needs to travel on tours, excursions, and other services if the operator wanted to offer that option.

Increasing the proportion of PSVAR compliant coaches into the fleet was always going to be a challenge for the industry given the cost of adaptation (circa £25,000 per vehicle) or vehicle replacement (circa £250,000+, potentially replacing coaches that would otherwise have a significant number of years life I eft in them). The Covid pandemic makes this even more challenging - operators will have been left with little or no capital or credit for such adaptations or replacements.





The coach industry wants to play its part in further increasing the number of accessible vehicles in operation. In order to help operators deliver Government's ambitions for PSVAR compliance across the entire home to school fleet - with the knock-on impact of improved accessibility across the fleet for other coach services - we propose Government grants are made available to cover at least a proportion of the cost of retrofit/replacement.

> Even where coaches are fully compliant to PSVAR standards, accessibility can sometimes be hindered by lack of appropriate space. There needs to be a suitable, flat, and stable area that is at least 3 metres in depth and 1 metre wide in order to deploy the wheelchair lift. The area should also be clear of any overhanging trees and street furniture such as waste

bins and lamp posts that are positioned next to the kerb, as these will prevent the coach from deploying the lift.

We therefore urge local authorities to ensure careful consideration is given so that, where there is a regular and/or mandatory need to provide fully accessible transport, these areas are kept clear to support accessible coach travel for all.

## Future beyond Covid-19: employment

upporting the recruitment and training of coach drivers would help the government to increase employment numbers and will contribute to the UK's economic recovery as we exit the Covid-19 pandemic. Good quality drivers are essential to the success of the coach industry, however in the UK the shortage of drivers (passenger and freight) was estimated to be growing at a staggering rate of 50 drivers per day pre-Covid, with a visible driver shortage across Europe of 19% in the bus and coach sector.<sup>25</sup> The average age of employed drivers in the passenger transport sector in Europe is 52 years old and it is thought that the difficulty of attracting younger drivers into the industry is one of top reasons for the driver shortage.<sup>26</sup>

## What we need from government

A key barrier to attracting young drivers is the age limitation on an unrestricted driving licence. Whilst a driver from the age of 18 years can carry out regular services up to 50km, a driver must be at least 21 years old to carry out longer and/or non-regular journeys, resulting in most coach driving being off-limits for people during their first two years out of compulsory education. Now the UK is no longer part of the European Union this regulation could be changed to enable drivers under 20 years to hold an unrestricted licence for domestic journeys (drivers travelling abroad would still have to be 21 years old to conform to international agreements).

A number of CPT coach operators have their own in-house training schools to both train recruits from scratch and to enhance and upgrade driving skills of existing and new staff, and CPT will work with operators to share best practice in recruitment, training, and retention. We shall also raise awareness of opportunities for

apprenticeships in the coach sector and make sure that members are aware of the funding support available to them for training and apprenticeships.

**3**m



across European bus & coach sector

P

Polling of IRU members and associated organisations in Europe from October 2018 to January 2019, reported on 20 March 2019 iru.org/resources/newsroom/fifth-driver-positions-unfilled-european-road-

#### 20 March 2019

iru.org/resources/newsroom/fifth-driver-positions-unfilled-european-road-



## Conclusion

oaches already provide valuable transportation for hundreds of thousands of people across the country every day. They have the potential to do even more post-pandemic, but they are currently struggling with the Covid-19 pandemic with little access to the same funding made available to other sectors. Government needs to recognise the importance of the coach sector and provide urgently needed support to enable them to survive. Coach operators have a vital role to play in the UK's economic recovery and, with support to survive the pandemic, will bounce back to become the healthy and profitable sector it was pre-Covid-19.

Looking beyond the pandemic, never have issues around the environment, congestion and social inclusion been so prevalent. Coaches can make a huge contribution to tackling all these issues. The coach industry stands ready to play its part, but we need support from all levels of government to do so.

We estimate that just a 15% increase in coach passenger journeys by British people each year could lead to approximately 47 million fewer cars on the road, saving over a quarter of a million tonnes of carbon dioxide and significantly reducing congestion.

By reducing congestion we can improve journey times and connectivity across the country for everyone.

By reducing traffic on the roads we can improve safety.

Through improvements to the coach fleet we can reduce carbon dioxide emissions even further – by around 56,000 tonnes over the next decade – and reduce emissions of nitrogen oxides by enough to equate to £225 million in damage cost savings.

By supporting the growth of the coach sector we can support the delivery of VisitBritain's ambitions to attract 49 million more visits and £35 billion more tourism spending by 2025.

Ρ

## we urge local & national government **to work with us**

## to deliver the improvements set out in this strategy

deliver a coach industry fit for the **21st Century** and beyond



# Annex A: CPT proposed developer checklist

When considering a plan for a development, consider the following questions:

Is this a substantial development?

Is there a possibility that large volumes of people might be using/visiting this facility?

Is there any possibility that these visitors will arrive in groups – typically ten or more as a guide?

Would the viability of the development be more attractive if group visits were encouraged?

If the answer to any of these questions is yes, consideration needs to be given as to how those groups will arrive and the ability for visitors to arrive by coach. As a minimum, consideration should should be given to whether the site has:

- Access from main roads suitable for large vehicles
- Suitable and safe areas for passengers to be set-down and picked-up – on or off street. Note that coaches can be larger than buses
- Safe exit from the pick-up/set-down and parking area for the coach – consider turning areas or the safety of any reversing manoeuvres required
- Provision for less mobile or mobility impaired customers i.e. with room for a wheelchair lift to be deployed – the guide for wheelchair access area is one which extends inward 3m from the kerbside and a minimum of 1.8m in of kerbside length. This could be located at the front of the coach or in the middle – up to 8m from the front
- Safe passage from this area into the facility, including for both children and the elderly
- Adequate on-site parking for the anticipated number of coaches which is suitable for large vehicles. Where on-site parking is not feasible/ available:
  - Where will the coaches travel to once passengers are dropped?
  - How far is this in driving time? consider the need for drivers to have breaks whilst parked - 45 minutes is as a benchmark for this - does drive time + 45 mins + return time match the anticipated length of stay for visitors?





cpt-uk.org

#backbritainscoaches

Rebecca Kite Policy Manager rebecca.kite@cpt-uk.org