

TransportPlanning*Society*

**One Great George Street, LONDON SW1P 3AA
T : 020 7665 2238 F : 020 7799 1325 E : info@tps.org.uk**

Response to Department for Communities and Local Government Consultation on Proposed Changes to National Planning Policy

The Transport Planning Society is an independent institutional body in the UK, established to facilitate, develop and promote best practice in transport planning and to provide a focus for dialogue between practitioners and others interested in the field. It is supported by four long established professional institutions – ICE, CIHT, CILT and RTPI - all of whom have an interest in transport planning as well as their own core activities.

The Transport Planning Society administers its own Professional Development Scheme for transport planners, leading to award of the Transport Planning Professional (TPP) qualification which is the only professional qualification uniquely aimed at transport planners. The Society has over 1200 individual members and 30 corporate member providers of transport planning services in the UK and elsewhere. Many of our members are active in national planning policy.

Our response has been drafted by the Policy Group within the Transport Planning Society Board, all of whom were elected by the membership as a whole. The Policy Group is in constant dialogue with other members of the Society and the views expressed here may be taken as representative of those held generally by our membership.

Consultation Response

Although our individual members may have views on a range of planning issues, as a Society we would like to respond on the main transport-related elements of the consultation. Therefore we have only commented on the topic below. Responses from our partner organisations such as the RTPI will cover the wider planning issues.

Increasing Residential Density around Commuter Hubs

The Transport Planning Society supports the DCLG's proposals to support higher density housing development around existing and new commuter hubs to help meet a range of housing needs. In our 2015 member survey, we asked for respondents' priorities for transport planning in the coming year. Using planning policy to reduce the need to travel was the number one priority (followed closely by contributing to a healthier lifestyle and decarbonising the transport sector). Considering the survey is of transport planners not land use planners, this illustrates the importance of integrating transport and land use planning, which is at the heart of the TPS approach.

Given a choice of developing around commuter hubs within existing or new urban areas compared to adding development in urban fringe locations, often on greenfield sites, the former is much preferred. This is because increased density makes sustainable travel choices more attractive and thus reduces per capita impacts from transport, so it provides a more sustainable alternative for urban growth.

We answer the specific consultation questions below.

Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?

The definition should be clarified.

For part a) 'a public transport interchange (rail, tube or tram) where people can board or alight to continue their journey by other public transport (including buses), walking or cycling' we suggest the following refinements:

- Clarify term 'public transport interchange (rail, tube or tram)' as 'rail-based public transport interchange (e.g. surface rail, underground or tram)' or similar;
- The definition could in theory apply to a relatively small public transport stop, for example a rural rail station. The definition should either be amended to be more explicit about what type of stops this applies to, or provide guidance on appropriate levels of density in different contexts. The former is preferred;
- The overall term of 'commuter hub' is not reflected in the definition as there is no reference to commuter use of the interchange. It is suggested this is changed to 'public transport hub' or similar to reflect a wider range of uses.

For part b) 'a place that has, or could have in the future, a frequent service to that stop. We envisage defining a frequent service as running at least every 15 minutes during normal commuting hours' we suggest the following refinement:

- This statement appears to be trying to bring other places that have public connections to the commuter hub. But given the comments above about the potential small scale of some of these hubs this could end up including lots of very small scale places. We suggest this part of the definition or removed or significantly revised to be clearer about what type of places it is aiming to include.

Overall, the real benefit from this change in policy is likely to be in suburban rail stations and town and city centre locations. The definition should be clarified to focus on these areas. Local authorities would need to define and identify hubs in their area before this policy could be applied.

Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?

We have some further suggestions on these proposals below:

- The consultation document focuses on residential density. Whilst this is important and is likely to be one of the main land uses encouraged by the policy, other land uses should be considered. For example encouraging employment in dense and accessible locations is preferable to out-of-town business parks where car-based congestion can be a major issue, and often leads to more road building. This is particularly important for knowledge-based jobs, which are important to a growing economy.
- The policy should also encourage more innovative uses of areas around public transport hubs, for uses such as car club or bike hire facilities, parcel delivery and collection services, other daily services such as dry cleaning and library or medical facilities, or flexible workspaces. The focus should be on generating activity around these hubs rather than just residential density.
- The higher density development around the public transport hubs should provide high quality and well planned walking and cycling routes and facilities. There is a risk of increasing car traffic if alternative modes are not well provided for. Walking and cycling routes should be direct, more convenient and cheaper than the car alternative, safe, well lit, etc. This is vital to the success of the development.
- In a similar vein, it is essential that the higher density development overall is of a very high standard. There is often significant local public opposition to higher density development in central areas, often based on fears of increased car traffic or visual impact on the urban landscape. Any higher density development should be sympathetic to the surrounding urban fabric and at an appropriate scale to allay the majority of fears about its impact. To support the policy, the DCLG should promote

good practice and case studies of successful high density development around public transport hubs to demonstrate what can be achieved and models to follow. The TPS would be more than happy to help with this if needed.

- There is nothing significant in policy that is stopping higher density development around public transport hubs at the moment, but it does not happen as often as our industry would like. We would like to see the DCLG undertake some research on the barriers to making this happen and support local authorities and developers in overcoming these barriers. These may be issues of land ownership, funding or skills available to promote higher density development around public transport hubs.

Q5. Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?

On balance the TPS agrees that DCLG should not introduce a minimum density requirement in national policy with this proposed change. We agree that it is important for density ranges to be decided locally to be aimed at local needs and appropriate to the context. However, this leaves the policy open to a wide range of interpretation and must be addressed if it is to be effective. As per our previous comments above, some guidance on good practice and appropriate applications would be helpful, as well as typical barriers and how to overcome them. It should also be made clear to authorities that if they are considering greenfield, green belt or urban fringe sites, they should be required to demonstrate why higher density development around public transport hubs in their area has not been considered or is not appropriate.

We consider that the density of 40 dwellings a hectare is too low and should not be suggested or implied as a benchmark. Higher density development falls normally in the range 60-100 and this should be made explicit in any guidance. Local authorities should be encouraged to define appropriate ranges of (minimum) density in their local area. They should also set out procedures to follow if they get an otherwise attractive planning application which does not meet the density criterion.

We are also concerned that the research quoted uses a cut off of 0.5 miles around the hub. Walking is still the dominant mode up to about a mile and the provision of secure, high quality walking conditions increases the distance people are willing to walk. Encouraging higher densities over a wider radius from the hub rapidly increases the area affected and thus the benefits in terms of number of dwellings. Guidance should start with a mile and innovative ways of improving walkability of this catchment area (and potentially extending it) should be encouraged.

One final comment is related to the GLA's Public Transport Accessibility Level (PTAL) guidance which is applicable to London. This guidance specifies density levels that are appropriate to different levels of PTAL in the capital. The DCLG should be clear about how this proposed policy change affects the PTAL guidance.

We will be happy to provide any further information requested or to engage further with the DCLG on this subject.