



# Department for Transport

## **Consultation on the Strategic road network and the delivery of sustainable development: consultation questionnaire**

### **Introduction**

We are proposing changes to a circular that explains how National Highways will engage with the planning system. It also gives details on how National Highways will fulfil its remit to be a delivery partner for sustainable economic growth whilst maintaining, managing and operating a safe and efficient strategic road network.

These changes:

- strengthen environmental policies in response to the transport decarbonisation plan and the drive towards zero emission transport
- implement policy to reflect a recent written ministerial statement about lorry parking and a new section on freight facilities
- clarify policy in order to address legal issues
- remove or amend out of date material

For more information, please refer to the consultation document.

The consultation will be active for 8 weeks, closing at 23:59 on 15 September 2022. Once the consultation has closed, all responses will be reviewed and a government response will be published providing an overview of the views and suggestions made.

## **Confidentiality and data protection**

We are asking for your views on changes to a circular that explains how National Highways will engage with the planning system.

We are asking for:

- your name and email address, in case we need to ask you follow-up questions about your responses (you do not have to give us this personal information, but if you do provide it, we will use it only for the purpose of asking follow-up questions)
- whether you are representing an organisation or yourself
- if you want your return to be treated as confidential, for your security

For organisations we are asking for the:

- name of the organisation, for identification purposes
- type of organisation you are, to ascertain your relationship with the topic

Your consultation response and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. DfT will, under data protection law, be the controller for this information. DfT's privacy policy [\[opens in new window\]](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Any information you provide will be kept securely and destroyed within 12 months after the closing date.

## Questions on respondents

1. Are you responding as an individual or on behalf of an organisation?  
(select only one)

- ~~Individual [continue to Q4]~~
- **Organisation [continue to Q2]**

2. What is the name of your organisation?

Insert answer here:

**Chartered Institution of Highways and Transportation**

3. What type of organisation do you work for? (select only one)

- ~~Academic think-tank~~
- ~~Business or private sector~~
- **Civil Society (charity, etc)**
- ~~Public sector body~~
- ~~Other~~

4. Please provide your name and email address

Insert answer here:

Kyle Fairbairn

[Kyle.fairbairn@ciht.org.uk](mailto:Kyle.fairbairn@ciht.org.uk)

5. Do you want your response to be treated as confidential or do you agree for your answers to be quoted on an anonymised basis?  
(select only one)

- ~~I want my response to be confidential~~
- **I agree for my answers to be quoted on an anonymised basis**

# Consultation proposal

## Proposal summary

This revised circular:

- makes a number of changes to strengthen environmental policies in response to the transport decarbonisation plan and the drive towards drive towards zero emission transport
- implements policy changes to reflect a recent WMS about lorry parking and a new section on freight facilities
- includes minor changes to clarify policy in order to address legal issues
- includes changes to remove or amend out of date material

### 3.2 Introduction

This section updates the introductory paragraphs of C02/2013 by setting out the role of National Highways (NH) and the Strategic Road Network (SRN) and how the Circular should be applied, as informed by the wording in NH's Licence and Road Investment Strategy 2. It also sets out that the SRN plays a vital role in growing the economy, levelling up the country and strengthening the Union.

For more information, please refer to section 3.2 of the consultation.

Q1. Do you agree or disagree with the changes proposed in the introduction section?

Insert answer here:

Agree. The wording in the introduction section makes good reference to decarbonisation efforts that are taking place more widely within DfT and Government, and that the SRN will support a shift away from private car use. In addition, this section makes good reference to planning practice, as well as creating good linkages to planning policy and guidance – something that has previously been absent from policy and guidance related to transport.

The introduction section makes clear that the SRN must contribute to sustainable development and that this document must be read by key stakeholders involved in the development process (developers, local authorities, and consultants). Moreover, the introduction clearly states the importance of National Highways role in the delivery of net zero. CIHT supports the inclusion of National Highways supporting Local Authorities to reduce car dependency through engagement in plan-making and decision-making stages.

The move away from predict and provide is something that CIHT has long advocated for as indicated in CIHT Futures <sup>1</sup>. However, CIHT would like to make clear that it would like to see a firmer commitment from National Highways to not refer to, or require, 'robust assessments' of the SRN.

### **3.3 New connections and capacity enhancements**

The revised text reflects changes to the planning system since the Circular's publication, the publication of National Highways' Licence, and makes a small number of other minor changes.

For more information, please refer to section 3.3 of the consultation

Q2. Do you agree or disagree with the changes proposed in the new connections and capacity enhancements section?

Insert answer here:

Agree. CIHT advocates for transport to be catered for against a sustainable transport hierarchy. This means that walking, wheeling, and cycling should be prioritised first, followed by public transport, with the private motor vehicle being prioritised last in all cases.

The need to locate development in areas of high accessibility is one that the CIHT supports, and one that has been outlined in the CIHT publication, better planning, better transport, better places <sup>2</sup>.

CIHT supports the change in wording that means that capacity upgrades to SRN will be taken on a case-by-case basis and will not be the default

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<sup>1</sup> <https://www.ciht.org.uk/knowledge-resource-centre/resources/futures/>

<sup>2</sup> <https://www.ciht.org.uk/knowledge-resource-centre/resources/better-planning-better-transport-better-places/>

choice when undertaking new development, with use of existing infrastructure taking priority.

### **3.4 Engagement with plan-making**

The revised text reflects changes to the planning system since the circular's publication, the national planning policy framework (NPPF) and planning practice guidance (PPG), and makes a small number of other minor changes

For more information, please refer to section 3.4 of the consultation

Q3. Do you agree or disagree with the changes proposed in the engagement with plan-making section?

Insert answer here:

Agree. The wording in this section now reflects the need for there to be integration of plan-making and land-use, and how this affects the SRN. This provides the opportunity for better alignment, and as such, restrict unnecessary capacity upgrades and network enhancements to the SRN. Currently, there is too much correlation between new development and capacity and network enhancements to the SRN, therefore CIHT supports the change in wording found here.

Not only will this contribute to the decoupling of SRN upgrades and development, but it will also allow for increased efficiency of the SRN through providing a clearer picture of future development through land designation.

CIHT agrees that the SRN must not be compromised in delivering its prime function of enabling long-distance movement of people and goods by the activities undertaken in plan-making. However, CIHT does support that, if undertaken correctly, proper plan-making can enable the delivery of the SRN's prime function. Therefore, CIHT agrees that there should be effective communication with plan-making to ensure that the performance of the SRN is not compromised.

### **3.5 Engagement with planning decision-taking**

The revised text reflects changes to the planning system since the Circular's publication, the statutory requirements, updates general principles to prioritise sustainable transport opportunities, and makes a small number of other minor changes

For more information, please refer to section 3.5 of the consultation.

Q4. Do you agree or disagree with the changes proposed in the engagement with decision-taking section?

Insert answer here:

CIHT welcomes that if a development is in accordance with a local plan, then the role of National Highways will be limited to agreeing the final form and phasing of any infrastructure and measures to reduce car use (aka travel plans) only, rather than requiring a reassessment of the impact of the new development.

CIHT would like to see a commitment that National Highways will not require 'robust' assessments of new developments. There's a mention of "sensitivity tests" in this section, which suggests that National Highways can still request assessments of higher trip rates – something that is against the principles of sustainable development but is routinely requested by National Highways. Therefore, these changes do not appear to prevent National Highways from doing this, and as such, could allow them to delay or prevent sustainable development.

CIHT would like to make the point that although the wording has been changed to better reflect decarbonisation efforts and the integration of planning and transport policy, there is still scope for National Highways to continue with 'business as usual' and for worst case scenarios to still be requested and modelled.

### **3.6 Special types of development**

The revised text reflects changes to the planning system since the circular's publication, a general update to the policies on advertisements, gateway structures and public art, electronic

communications apparatus, on-shore wind turbines, and makes a small number of other minor changes.

For more information, please refer to section 3.6 of the consultation.

Q5. Do you agree or disagree with the changes proposed in the special types of development section?

Insert answer here:

No Comment

### **3.7 Roadside facilities**

The revised text has moved from annex B of the circular 02/2013 to the main text and reflects changes concerning HGV facilities, minimum requirements for roadside facilities, provision for zero emission and hybrid vehicles and makes a small number of other minor changes:

This policy has moved from annex B of C02/2013 to the main text of the circular.

For more information, please refer to section 3.7 of the consultation.

Q6. Do you agree or disagree with the changes proposed in the roadside facilities section?

Insert answer here:

No Comment

### **3.8 Annex A: roadside facilities table**

Annex A sets out the roadside facilities tables without the policy text. The policy text is set out in the roadside facilities section.

For more information, please refer to section 3.8 of the consultation.

Q7. Do you agree or disagree with the changes proposed for annex A?

Insert answer here:

No Comment

Q8. When should the new requirements in annex A apply from?

Insert answer here:

No Comment

Q9A. Are the facilities and parking current required by the Circular sufficient or not sufficient, to enable utilisation of longer and heavier vehicles:

- sufficient?
- not sufficient?

Insert answer here:

No Comment

Q9B. Please explain your answer.

Insert answer here:

No Comment

Q10. What additional facilities and/or parking could be required to enable utilisation of longer and heavier vehicles? Please explain your answer.

Insert answer here:

No Comment

### **3.10 The circular**

Q11. In what format would you like to see the circular published moving forward?

Insert answer here:

No Comment

### **3.11 Equality**

Q12. Do you agree or disagree the proposed objectives meet our obligations under the Equalities Act 2010?

Insert answer here:

No Comment