

The Chartered Institution of Highways and Transportation (CIHT) response to Well-Managed Highway Infrastructure: A Code of Practice - Consultation for 2026 Update

The Chartered Institution of Highways and Transportation (CIHT) is a charity, learned society and membership body, with over 10,000 members across 12 UK regions and several international groups. CIHT represents and qualifies professionals who plan, design, build, manage, maintain and operate transport and infrastructure.

General Feedback

Whilst we have endeavoured to obtain feedback from our members to the draft code of practice, this has been difficult to obtain as the time-scale given for a document of such length was not sufficient, especially as one of those weeks is half term and contains a bank holiday. It would be useful to reconsult on the code of practice with a 12-week consultation so that richer feedback may be obtained.

Part A- Overarching Principles

General feedback on Part A – Code of Practice

The draft currently refers authorities to the Highway Infrastructure Asset Management Guidance (HIAMG) for performance management. While valuable, HIAMG is primarily asset-focused, covering asset condition, levels of service, performance targets and the Asset Management Framework. It does not adequately address the performance of the highway service as experienced by the public, businesses, communities and network users.

This distinction matters. The National Audit Office report and Public Accounts Committee hearing highlighted a disconnect between local roads management and public experience. Given that HIAMG was the principal guidance at that time, relying solely on the same asset-focused approach risks perpetuating that disconnect.

Highway authorities are not only managing assets; they are delivering a critical public service. Service performance is reflected in journey reliability, safety, accessibility, disruption, communication, responsiveness, value for money and public confidence. Effective asset management alone does not demonstrate whether the service is meeting public needs, supporting local economies or delivering expected outcomes.

The Code should therefore provide stronger guidance on service performance and benchmarking. This need not prescribe specific tools, surveys or frameworks, but should establish the principle that authorities understand and manage performance across the whole highway service, integrating asset condition, operational delivery, customer insight, efficiency, resilience and outcomes.

In respect to integrating resilience principles, the relatively minor 'tweaks' of the 2016 document that has been undertaken in this copy are insufficient to meet the challenges the sector will be facing in coming years. Treating Resilience as a discrete aspect of practice only discussed in A6 (rather than as something that needs to be embedded throughout), risks allowing users to overlook it.

Please provide any feedback on A.3 – Network Strategy

Ways of working including risk-based and security-minded approaches, stakeholder engagement, innovation, artificial intelligence and designing for maintenance

CIHT has long advocated for the sector to move beyond traditional consultation and adopt a collaborative, inclusive and whole-life approach to stakeholder engagement. In CIHT's 2024 report, *Creating a Public Realm for All* (<https://www.ciht.org.uk/news/creating-a-public-realm-for-all/>) we outlined how the principle of 'co-cultivation' can be used to ensure continuous and meaningful participation from inception through monitoring and re-evaluation, creating a shared understanding between users and designers. It's important to use a variety of engagement methods to ensure that the views of all relevant stakeholders are captured.

For more information, please see CIHT Learn's *Introduction to Stakeholder and Public Engagement* module (<https://cihtlearn.org.uk/#/dlp/course/d89c95b4-28cf-4947-9014-1122b2537d51>), which reinforces that meaningful engagement should be continuous, collaborative and embedded throughout project development rather than undertaken as a single consultation exercise.

Where artificial intelligence and digital tools are referenced, the Code should include principles for data governance, transparency, ethical use and auditability to ensure safe and trusted deployment. For more information about the ethical and transparent use of AI please see CIHT's report, *The role of data and artificial intelligence in achieving transport decarbonisation* (<https://www.ciht.org.uk/knowledge-resource-centre/resources/the-role-of-data-and-artificial-intelligence-in-achieving-transport-decarbonisation/>).

Please provide any feedback on A.7 – Finance and Investment

CIHT suggests including the following text: "*Performance and benchmarking information should be used to support transparent communication with the public, elected members and government. Authorities should be able to explain how investment decisions are prioritised, the outcomes being sought, and how performance information is used to drive continuous improvement.*"

General feedback on Part B – Highways

This question is intended to capture high-level or overarching feedback on Part B of the Code of Practice, such as the overall approach, structure, clarity or tone.

You will have the opportunity to provide more detailed feedback on individual sections (B.1 to B.9) in the questions that follow.

The explicit expansion of the introductory scope to include modern active travel infrastructure, such as walking, wheeling, and cycling, as well as digital and Intelligent Transport Systems (ITS) components alongside traditional pavement assets is a very positive development. It reflects a broader and more up-to-date understanding of transport infrastructure and acknowledges the increasingly important role that active travel and digital systems play within the wider network.

CIHT Learn's *Introduction to Highway Infrastructure Asset Management* (<https://cihtlearn.org.uk/#/dlp/course/00c86ba1-b536-4579-8e44-2fdbac106497>) module reflects current sector practice in whole-life and risk-based asset management approaches and supports the need for stronger guidance on asset categorisation, lifecycle planning and resilience.

Please provide any feedback on B.1 - Scope of the Part B – Highways

This section contains:

- *Introduction*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

B.1.1 INTRODUCTION- Cycling should be considered as a distinct transport network in its own right, rather than being viewed simply as part of either the carriageway or the footway. Planning for cycling as a separate network would help create safer, more coherent, and more effective infrastructure that better reflects how people actually travel. For more information, please see CIHT Learn courses on Planning for Cycling (<https://ciht.streamlxp.com/courses/58>).

B.1.1.1: Part B of well-managed Highway Infrastructure should consider including other highway assets, such as disabled-user facilities, public toilets and public transport facilities.

B.1.1.2: It might be worth identifying different types of assets across Local Authorities, such as: (1) adoptable highways, (2) privately maintained assets, and (3) other third-party infrastructure apparatus such as utility, sewer, etc. and including a definitive map which establishes the highway boundary to identify assets within each's responsibility.

B.1.1.5: Under "Guidance on general best practice and recommendations can be found on the following websites", it might be worth mentioning other guidance on best practice, such as

“Climate resilience and sustainability”, Climate adaptation strategy for transport - GOV.UK (see pages 109 / 110)

CIHT also suggests that UKRLG considers including digital assets (e.g. data platforms, digital twins, sensors) as formal components of the highway asset base, to promote formal recognition and align with international leading practice.

Please provide any feedback on B.2 – Legal Framework – Highways

This section contains:

- *Introduction*
- *Highway-specific legal considerations*
- *Public rights of way*
- *Movement of traffic and regulatory functions*
- *Winter service*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

B.2.1 INTRODUCTION B.2.2: HIGHWAY-SPECIFIC LEGAL CONSIDERATION Climate change impacts are an important topic in the highway's legal framework; consideration should be given to inserting the Flood and Water Management Act 2010.

<https://www.legislation.gov.uk/ukpga/2010/29/contents> And Climate Change Act 2008

<https://www.legislation.gov.uk/ukpga/2008/27/contents> Notably, the Highway Act 1980, the Road (Scotland) Act 1984, and the Roads (Northern Ireland) Order 1993 predate modern climate change legislation and the environmental context and appear not to have considered the Climate Change Act 2008 and the Flood and Water Management Act 2010. There is a need to strengthen biodiversity and climate-change resilience within the legal highway framework.

B.2.3 PUBLIC RIGHTS OF WAY- This section could be improved to more clearly show how PRow interacts with public highways in asset management.

B.2.4 MOVEMENT OF TRAFFIC AND REGULATORY FUNCTIONS There are a few regulations that are worth considering, e.g. The Road Traffic Regulation Act 1984 (RTRA), which governs the speed limits, temporary traffic orders, etc.

<https://www.legislation.gov.uk/ukpga/1984/27/contents>.

B.2.4.6 contains a minor typo, “Northen Ireland”, which should be corrected before publishing

“Clarification would be helpful on how emerging risks (e.g. climate change impacts, AI-enabled systems) interact with existing duty of care and liability frameworks.”

Please provide any feedback on B.3 – Asset Strategy – Highways

This section contains:

- *Introduction*
- *Principles and considerations*
- *Maintenance and management of active travel infrastructure*
- *Competence*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

B.3.2.1 There should be consideration to include in the local authority's highways assets management strategy, such as a climate-resilience adaptation strategy, and net zero emissions in the delivery of assets.

B.3.2 PRINCIPLES AND CONSIDERATIONS Considerations to add are principles for highway asset management, such as (1) Climate Change Resilience and Adaptation, and (2) Carbon reduction and environmental sustainability. All of these align with the Environmental Act 2021, the Climate Change Act 2008, and the net-zero emissions strategy.

B.3.2.2 bullet point two “Stakeholder Engagement” – a minor grammatical error, “needs to road users” should be “needs of road users.”

B.3.2.5 bullet point three should be “How assets will be managed, maintained, and invested in”.

B.3.3.1 There is a need to identify some of these national policies that help to increase walking, wheeling and cycling, such as LTN 1/20 Cycle Infrastructure, Manual for Streets, Active Travel Guide etc

B.3.4 COMPETENCE B.3.4.2, alongside the IHE guidance that provided information for competency training for highway asset holders such as inspectors, managers, etc. Consideration should be given to ensuring that the asset holder is aware of health and safety duties under the Construction (Design and Management) Regulations 2015 when carrying out asset management across the highway.

Please provide any feedback on B.4 – Risk-Based Approach – Highways

This section contains:

- *Introduction*
- *Highways risk-based approach framework*
- *Asset-specific guidance*
- *Balancing priorities by type*
- *Priorities for emergency and reactive maintenance*
- *Priorities for planned maintenance*
- *Priorities for programmed maintenance*

- *Priorities for routine maintenance*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

B.4.1.1 It might be worth expanding the reasons why the risk-based approach is useful for highways. These are anticipated measurable objectives, such as (a) in complying with statutory duties, safety, maintenance, etc.

B.4.2.1 HIGHWAYS RISK-BASED APPROACH FRAMEWORK- A risk model or risk cycle will be helpful and serve as a guiding principle to the asset user. (Define risk, assess risk, evaluate risk, treat risk, implement risk, control risk, and continuously monitor risk).

B.4.3 ASSET SPECIFIC GUIDANCE. B.4.3.1 The risk-based approach supports authorities to comply with statutory duties under the Highway Act 1980.

B.4.3.2 Consideration for risk should also include the climate change risk impact on infrastructure, and the carbon impact risk assessment.

B.4.3.7 Add “Landscaped areas and tree forms are an integral part of adoptable highways, however” before the start of this sentence.

B.4.4.2 Stated “For the other four categories listed above”- this paragraph should identify the four categories referred to for traceability. It would be useful to clarify whether this paragraph refers to emergency/reactive, routine, planned, and programmed maintenance.

Please provide any feedback on B.5 – Asset Knowledge – Highways

This section contains:

- *Introduction*
- *Principles and considerations*
- *Inspection categories*
- *Asset-specific subsections e.g. carriageways, footways*
- *Network integrity*
- *Regulatory functions*
- *Additional data sources*
- *Reliability of data*
- *Developments in technology for data collection*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

B.5.6 - The discussion on "cycleways" in B.5.6 continues to frame cycling as part of the carriageway or the footway and inspections reflect this. We recommend the introduction of a new cycleway hierarchy based on the LCWIP Technical Guidance with "primary", "secondary" and "local" categories of routes with an appropriate inspection frequency for cycleways, regardless of the category status of highway assets that a cycleway might share or be in parallel to.

Please provide any feedback on B.6 – Resilience and Adaptation – Highways

This section contains:

- *Introduction*
- *Resilience and the core objectives*
- *Highway specific hazards*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

N/A

Please provide any feedback on B.7 – Finance and Investment - Highways

This section contains:

- *Introduction*
- *Lifecycle planning*
- *Income generation*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

N/A

Please provide any feedback on B.8 – Sustainability – Highways

This section contains:

- *Introduction*
- *Principles and considerations*
- *Environmental sustainability*
- *Social sustainability*
- *Economic sustainability*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

N/A

Please Provide any feedback on B.9 - Winter Service

This section contains:

- *Introduction*
- *Principles and considerations*

When providing feedback on this section, you may wish to reference the specific subheading(s) listed above to which your comments relate. This will help ensure that feedback is clearly targeted and can be appropriately considered.

N/A

General feedback on the Code of Practice

Overall, CIHT welcomes the direction of the updated Code of Practice and the opportunity it presents to drive consistency and improvement across the sector. Strengthening alignment with whole-life asset management, climate resilience, digital transformation and customer-focused outcomes will be critical to ensuring the Code supports a modern, resilient and high-performing UK highway network.

ENDS