

**The Chartered Institution of Highways and Transportation (CIHT) submission to
DEFRA Land Use Consultation**

The Chartered Institution of Highways and Transportation (CIHT) is a membership organisation representing over 10,000 people who work in the highways and transportation sector. CIHT members plan, design, build, operate and maintain best in-class transport systems and infrastructure.

CIHT welcomes the opportunity to respond to the DEFRA Land Use Consultation. While much of this consultation is focused on agricultural land use, we have responded to questions relating to areas of the Land Use Framework that will have implications for the highways and transportation sector. CIHT encourages the government to continue to engage with a wide range of stakeholders to ensure that the proposed framework fully supports better land use decisions across a wide range of priorities.

QUESTION 9: What should Government consider in increasing private investment towards appropriate land use changes?

There is a major opportunity for the highways and transportation sector to contribute to biodiversity net gain. As noted in the analytical annex, key transport infrastructure covers 4.2% of England's land. This land has major interaction with natural capital assets and is likely to undergo major changes, upgrades and expansion to support the transition to net zero and the growth mission. With greater investment there is an opportunity to be seized to ensure that the decarbonisation of the highways and transport sector also delivers enhanced biodiversity and climate resilience.

National Highways has made biodiversity net gain a key strategic priority for the strategic road network (SRN) in its [Strategic Road Network Initial Report](#), 2025-2030. The report highlights historic declines in biodiversity, such as a 60% decline in the abundance of UK priority species since 1970, which will require wide-ranging interventions to halt and reverse. National Highways is developing a programme of interventions to better integrate its soft estates with the wider natural environment to improve habitat connectivity, enhance biodiversity and create better resilience to climate change. Support and investment will be needed to assist local highway authorities to deliver similar outcomes on the local highway networks (LHN).

QUESTION 11: What approaches could cost-effectively support nature and food production in urban landscapes and on land managed for recreation?

In [our response](#) to the Government's proposed National Planning Policy Framework we noted that we support the delivery of good quality green spaces and nature in placemaking, and we welcomed the inclusion of the golden rules. Green and Blue Infrastructure (GBI) brings many social, environmental and economic benefits to a local area. However, in the CIHT whitepaper [Green and Blue Infrastructure: A transport](#)

[perspective](#) (2023) we highlighted that GBI is often under-utilised, and that knowledge gaps are slowing the planning and implementation progress. We suggest that a lack of guidance partly explains why local authorities (including the planning, development, highways operations, and maintenance functions) struggle to fully engage in the GBI process. CIHT would welcome the introduction of guidance that supports the development of GBI in public spaces.

In the report, CIHT recommended that central government bodies review current funding available to encourage GBI implementation and create a nationally agreed framework for commuted sums. We also recommended that local authorities establish formalised systems to include GBI within the highway network and planned improvements to create a performance framework for GBI to measure success and assign responsibility for targets.

As a professional body we are committed to working with government departments, such as the Department for Transport (DfT), Department for Environment, Food and Rural Affairs (DEFRA), and Department for Levelling Up, Housing and Communities (DLUHC) and local authorities, to raise the profile of GBI assets and jointly promote the associated benefits.

QUESTION 12: How can Government ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs?

As noted in [our response](#) to proposed reforms to the National Planning Policy Framework (NPPF), transport is a key spatial issue that requires strategic planning. CIHT welcomes the emphasis placed on the importance of spatial development strategies in the [Devolution white paper](#). Government must ensure that it is effectively fostering strategic collaboration, by ensuring that policy and guidance stresses the importance of collaboration at the earliest stage of plan making to encourage a more aligned and evidence-based approach. Planning is unlikely to be truly ‘vision-led’ without engagement with a wide-range of stakeholders. To be effective in maximizing the co-benefits and managing trade-offs, the government needs to ensure that there are effective processes and mechanisms to support collaboration and joint working efficiently.

In the planning system, organisational and remit boundaries within the government and local authorities have often resulted in a ‘siloed’ way of working. This consultation notes that there is a need for *‘a more joined-up, strategic approach to land use strategy and planning at a local level, linked to regional and national priorities ... to avoid siloed land use decision-making and to mitigate the risk of unintended consequences or unanticipated costs.’* For the Land Use Framework to create a more joined-up, strategic approach to land use strategy and planning it must be fully embedded across government departments, including the Department for Transport and the Ministry of

Housing, Communities and Local Government and supported by interdepartmental working. As recommended by the Land Use in England Committee's report [Making the most out of England's land](#) (2022), the land use framework should not solely focus on the remit of DEFRA, but rather address '*wider aspects of land use and that its remit crosses departments as required, avoiding the siloed approaches that have blighted land use policy in the past.*'

As outlined in our 2024 manifesto, [A transport network fit for all our futures](#), CIHT supports place-based solutions that create attractive built environments and lessen the need to travel. [The Land Use in England Committee's report](#) also advocated 'placed-based multifunctionality', noting that this approach can help simultaneously achieve multiple benefits in the same location. To ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs, the government should encourage spatial plans that foster a shared set of place-based objectives and outcomes.

In the CIHT report [Better planning, Better Transport, Better Places](#) (2019), we recommend focusing on place-based objectives to ensure maximum sustainable transport accessibility. This approach is cost-effective for both the public sector and developers, and improves residents' quality of life. It is important that development and infrastructure spatial plans establish transport constraints and opportunities from the outset. Structuring strategies around major transport corridors can enhance strategic connectivity. However, major transport corridors can also act as a barrier to local movement and accessibility, and can cause local severance problems. Effective plan-making can help address this by incorporating new crossings, not just new highways but also sustainable transport links, including footways and cycle ways, which increase permeability and make it more convenient to walk or cycle. In many cases, sustainable travel infrastructure can integrate existing and proposed development across these barriers much more readily and cost-effectively.

Infrastructure proposals on the Strategic Road Network (SRN) set out in the Road Investment Strategy (RIS) are usually seen as background context, so little consideration is given to them and how they might impact on Local Plans in many places. As noted in [our response](#) to the devolution white paper, we welcome plans to formalise partnerships between mayoral authorities and National Highways, ensuring coherent management of local roads alongside the Strategic Road Network. Building strong partnerships with strategic stakeholders, transport service providers, and local communities is vital.

QUESTION 13: How can local authorities and Government better take account of land use opportunities in transport planning?

Transport planning should be helping to deliver sustainable developments that encourage more people choosing to walk, wheel, cycle and use public transport). Currently, a lack of integration between land use and transport planning is acting as a major barrier to these outcomes.

The recent introduction of vision-led planning to the National Planning Policy Framework (NPPF) represents a positive step towards better land use outcomes. However, the government can do more to ensure we are getting the most out of land-use opportunities in transport planning. We believe it is important for the government to establish the role land use considerations should play in vision-led planning and ensure this is embedded across policy, including the Land Use Framework. We continue to advocate for further amendments to the NPPF, including integration of Department for Transport (DfT) methodologies through reference to transport-related guidance and reference to the government's Connectivity Tool for assessing/scoring the sustainability of a potential development site. We welcome that DEFRA has cited the Connectivity Tool in this consultation and encourage the government to ensure it is well embedded in the final Land Use Framework.

It is important that the principles of the Land Use Framework are embedded across departments, including the Department for Transport and the Ministry of Housing, Communities and Local Government. Better land use and transport planning outcomes require robust and integrated policy, designed to ensure that the location of developments enables increased accessibility to public transport and active travel networks as a priority, as well as easy access to local services through these sustainable modes.

In practice, local authorities should be developing local plans that commit to a clear, place-based vision that integrates sustainable transport from the start. This should include clear requirements for accessibility by sustainable modes and setting mode share targets. Stress-testing alternative land-use and transport options through different scenarios and multi-criteria assessments is fundamental to devising effective, sustainable plans. Local authorities should set place-based objectives focusing on indicators such as transport mode usage, street activity intensity, health, social equity and inclusion, and community severance. Government must provide adequate guidance to ensure this vision-led approach is being implemented at a local level, across multiple policymaking functions.

The government also needs to provide adequate support for the skills and resources needed to deliver integrated land use and transport planning. Within planning departments, transport specialists are rarely employed to support the development management function, and these teams generally have significantly less knowledge of and expertise in sustainable transport than traffic or highway issues. Further, a shift

towards specialisation means that transport engineering has come to focus on issues such as capacity, safety, and time saving.

CIHT welcomes the Government's commitment to delivering a transport system that works better for people across the country and enables growth and access to opportunities. We offer our ongoing support to the Government to help develop a more integrated system of land use and transport planning. CIHT encourages the government to continue to engage with stakeholders throughout this process and would be happy to facilitate cross-sector discussions to assist with this.

QUESTION 14: How can Government support closer coordination across plans and strategies for different sectors and outcomes at the local and regional level?

We would like to highlight here the importance of fostering better collaboration and integration relating to freight movement. There is no requirement for local planning authorities to plan for the needs of the freight or logistics industry - the focus of local plans tends to be housing, employment and retail. To be suitably (and sustainably) located the sites need to be close to the SRN, but finding such sites especially where roads have been constructed through sensitive landscapes (national parks and landscapes, etc) is extremely difficult.

There is significant appetite in both the public and private sector to develop more sustainable local freight and logistics practices. Local authorities have a key role to play, particularly in last mile logistics.

There is a need for guiding principles to be established around how freight and logistics considerations can be incorporated into planning and decision making. This includes parking accessibility for local businesses, arrangements for consolidation and other forms of infrastructure to support sustainable last mile practices. Local authorities can use their estate to support more sustainable last mile practices, and this should be a consideration when assessing supply of deliverable sites for decision making purposes.

We suggest strengthening the requirement for local authorities to develop freight strategies as part of Local Transport Plans. This should be accompanied by guidance which emphasises the importance of collaboration with local business owners, suppliers, logistics companies and other key stakeholders. We would also suggest that the development of a national transport strategy should include a framework for freight and logistics management.

QUESTION 16: Below is a list of activities the Government could implement to support landowners, land managers, and communities to understand and prepare for the impacts of climate change. Please select the activities you think should be prioritised and give any reasons for your answer, or specific approaches you would like to see.

- **Providing better information on local climate impacts to inform local decision making and strategies (for example, translating UK Climate Projections²⁹ into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature)**
- **Providing improved tools and guidance for turning climate information into tangible actions (for example, how to produce an adaptation plan for different sectors)**
- **Developing and sharing clearer objectives and resilience standards (for example, a clear picture and standards of good practice for each sector under a 2°C climate scenario³⁰)**
- **Supporting the right actions in the right places in a changing climate (for example, prioritising incentives for sustainable land uses where they will be most resilient to climate change)**
- **Other (please specify)**

As a learned society and membership body with 12 UK regions and a number of international groups, representing a wide range of stakeholders from across the transport sector we stress the necessity of delivering on all these actions.

Vulnerable infrastructure is rarely solely a transport/roads issue but affects a range of essential services. Infrastructure management and planning should account for the interdependencies and cascading failures caused by extreme weather. Strategic spatial planning can support a more systems-oriented approach to climate resilience by considering the interdependencies of assets and services across land spaces.

This consultation references the need to expand the national grid and the impact this will have on land use. Given that the decarbonisation of transport will make increasingly huge demands on the electricity supply grid, it is crucial that the supply grid is reinforced at every opportunity.

Last year, CIHT produced a report [Delivering a resilient transport network](#) (2024). The key take aways from that report were:

1. Urgency to act now and be prepared: CIHT calls for adaptation and resilience to be made an immediate investment and policy priority across all governmental transport strategies. There is a risk of significant and expensive infrastructure failures if resilience measures are not recognised as key strategic objectives

now. Extreme weather events are happening with increased frequency and intensity – it is imperative that we act now to mitigate the risk of possible losses.

2. Funding for maintenance: CIHT calls for investment in maintenance of our existing highways and infrastructure to ensure the continued and efficient use of our transport network. Incrementally adapting infrastructure and proactively maintaining it are crucial for extreme weather resilience and meeting decarbonisation goals.
3. Mandatory assessments of the current and future resilience of the infrastructure: CIHT encourages the legislative road authorities of the UK to make it a statutory requirement for all transport asset owners to carry out transport resilience assessments. This will help to identify vulnerabilities in the network, prioritise remedial action and identify who should be responsible. This should also apply to neighbouring asset owners and utilities where risks and impacts are clearly inter-twined.
4. Building a nationwide leadership: CIHT encourages the legislative road authorities of the UK to provide coherent and consistent guidance to the sector on how to undertake risk assessments on resilience. There is a need to avoid different operators and asset owners developing their own internal assessments based on different assumptions, leading to non-transferable or non-sharable data.

QUESTION 21: What gaps in land management capacity or skills do you anticipate as part of the land use transition? Please include any suggestions to address these gaps.

There is a wealth of knowledge and experience in the planning and transport infrastructure sectors. However, the CIHT paper [Fixing a failing planning and transport system](#) (2022) found that practitioners who were surveyed did not think the sector has sufficient skills to deliver sustainable transport in developments. Many of the responses indicated that the skills of practitioners are impeded by lack of resource in the public sector, an embedded car culture, and a general lack of political will.

Within planning departments, transport specialists are rarely employed to support the development management function, and these teams generally have significantly less knowledge of and expertise in sustainable transport than traffic or highway issues. Further, a shift towards specialisation means that transport engineering has come to focus on issues such as capacity, safety, and time saving. Wider public objectives like emissions, health and well-being, and inclusivity are not considered key issues.

Upskilling is a necessity to maximise the impact of a shift to ‘vision-led’ transport planning. More support is needed to ensure that local authorities are able to meet the targets being set for them and make sure developments are in the right places. The funding for 300 additional planners [announced in the Autumn Budget](#) is unlikely to go far enough in covering recruitment gap in the current workforce.

QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.

Land use interacts with a wide range of policy areas, with wide social and economic implications. It is vital that the Government provides consistent and integrated policy to ensure that it can deliver on better outcomes.

CIHT offers its continued support to the Government in its efforts to deliver these outcomes.

Ends