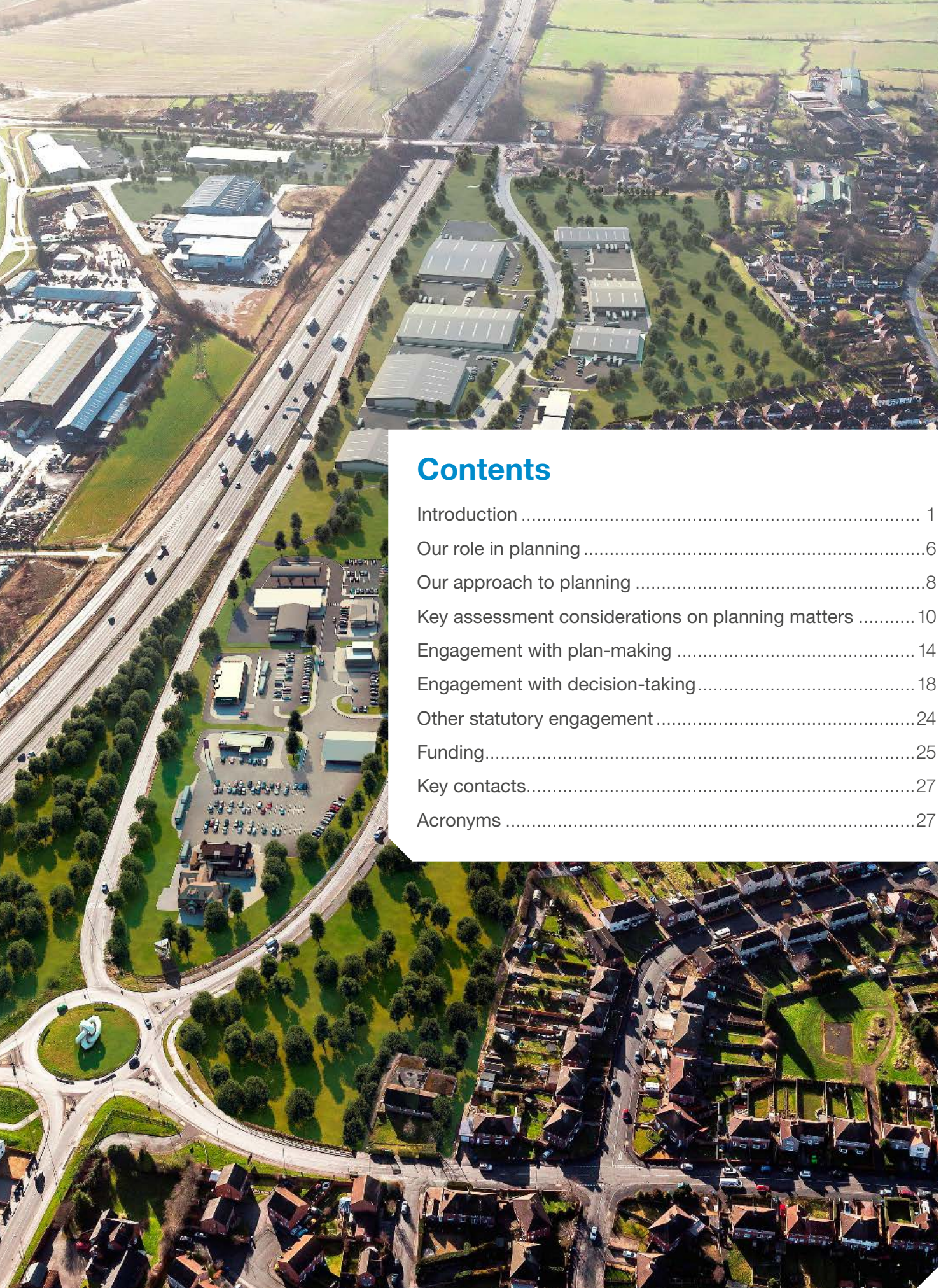


Planning for the future

A guide to working with
National Highways on
planning matters

October 2023



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Introduction

1. This document, our planning guide¹, describes the approach we take to engaging in the planning system and the issues we look at when considering draft planning documents and planning applications. It should be read in conjunction with the Department for Transport (DfT) Circular 01/2022²: *Strategic road network and the delivery of sustainable development*, which explains how National Highways will engage in the planning system and sets out the policy of the Secretary of State for Transport in relation to the strategic road network (SRN).
2. The guide provides further advice on the information we would like to see included in a planning proposal and outlines the support we can offer at every stage of the planning process. Like DfT Circular 01/2022, it is aimed at development promoters and their consultants, strategic policy-making authorities, local highway authorities, sub-national transport bodies, local enterprise partnerships, community groups and others involved in development proposals which may result in any traffic or other impact on the SRN.
3. This guide is written in the context of statutory responsibilities as set out in our operating licence and in planning legislation, and in support of Government policy including the *National Planning Policy Framework* (NPPF) and the DfT Circular 01/2022.

The role of the SRN in supporting a net zero Britain

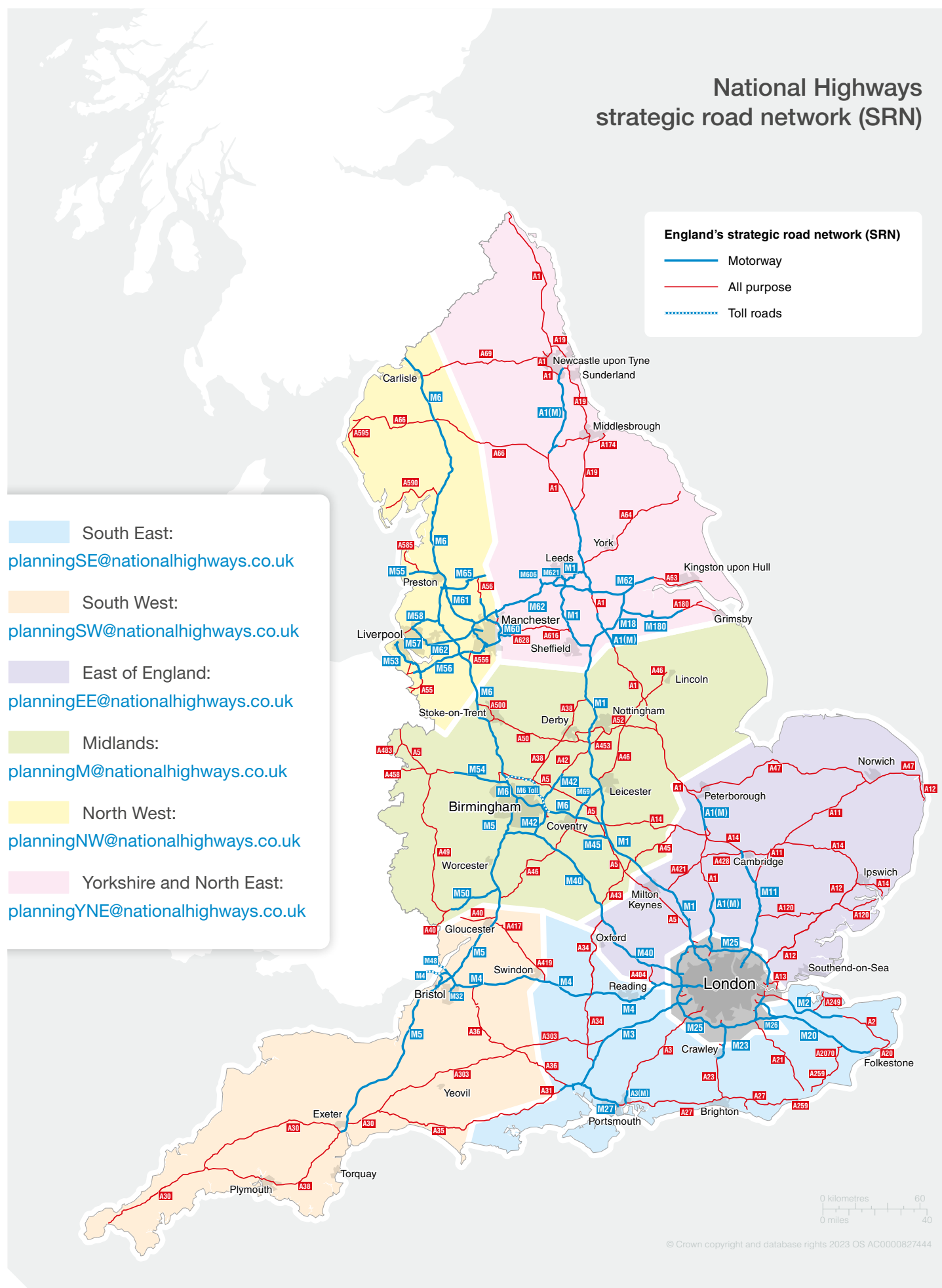
4. The SRN is arguably the biggest and single most important piece of infrastructure in the country (at 31 March 2022, the assets we hold were valued at £144.2 billion). The trunk motorways and all-purpose trunk roads that comprise the SRN are the most heavily used part of the national road network; they carry a third of all traffic and two-thirds of all freight.



¹ This version replaces the initial Planning Guide published in 2015.

² <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>

Figure A: SRN and regional spatial planning areas



5. As set out in the *Road investment strategy 2: 2020 to 2025*³, the principal purpose of the SRN is to enable safe, reliable, predictable, efficient, often long distance journeys of both people (whether as drivers or passengers) and goods in England between:
 - main centres of population
 - major ports, airports and rail terminals
 - geographically peripheral regions of England
 - chief cross-border routes to Scotland and Wales
6. The SRN therefore provides critical links between our cities and other urban areas, serves as a gateway to global markets and travel destinations, connects our communities with families and job opportunities, and binds and strengthens our union. It drives productivity and prosperity by unlocking growth, encouraging trade and attracting investment, and plays a vital role in levelling up the country.
7. As set out in *Connecting the country: our long-term strategic plan to 2050*⁴, National Highways' 2050 vision is for the SRN to be part of a seamlessly-integrated transport system that meets our customers' needs by connecting the country safely and reliably, delivering economic prosperity, social value and a thriving environment.
8. Today, however, roads are seen by many to work against the ambitions of a zero carbon economy. Yet to deliver a net zero economy, our roads have to be net zero too. This is why:
 - **Britain relies on roads today** - roads and cars are an integral part of our transport system.
 - **Road travel will decarbonise fast** - while road travel represents a higher carbon way to travel in the UK today, this is changing fast.
- **A new zero Britain will still travel by road in 2050** - while we support investment in all zero carbon transport options, investment in other forms of transport, such as rail, will make only a limited impact on how Britain moves.
- **Investment in Britain's roads supports a thriving net zero economy** - today every £1 investment in the SRN returns over £2 to the economy. Our roads directly support sectors which employ 7.4 million people in the UK and contribute £314 billion Gross Value Added to the economy. The industries that rely on the road network are expected to grow by 35% by 2030, which will generate an additional £110 billion of UK growth.
9. For more information see *Net zero highways: our 2030 / 2040 / 2050 plan*⁵ which aims to ensure our roads support the social and economic goals of our nation, while making sure we do so in an environmentally sound way.



³ <https://www.gov.uk/government/publications/road-investment-strategy-2-ris2-2020-to-2025>

⁴ <https://nationalhighways.co.uk/our-roads/future-roads/connecting-the-country/>

⁵ <https://nationalhighways.co.uk/netzerohighways/>

Working with us - early engagement

10. National Highways is a statutory consultee in the planning system. In discharging this responsibility, we act as a proactive partner. This guide aims to help you get the best out of your relationship with us and to show what you can expect from us. It sets out our approach to planning and what we look for when preparing and making decisions on plans and development proposals. The pages that follow explain our position, providing guidance and clarity on the matters that we shall have regard to, and what we are likely to find acceptable and unacceptable, to help you shape your proposals and ensure that they are sustainable in every sense.
11. This guide sets out how we, along with those acting on our behalf, will work to help you to assess and successfully manage the relationship between your proposed development and the SRN. We encourage all parties promoting and preparing plans or planning applications that could have an impact on the SRN to engage with us as early as possible.
12. Engaging with us early helps to ensure that issues which may take time to analyse and resolve are identified as soon as possible. We can then work together to establish a shared vision for the plan or proposed development, including:
 - considering the most appropriate locations for development
 - assessing the potential impact of development proposals on the SRN
 - enabling appropriate sustainable development (including considering how best to deliver the development, and any associated mitigation works, whilst minimising the adverse impacts that it might give rise to)
 - promoting journeys made by a range of modes other than private car, for example, by considering public transport, walking and cycling routes, whilst

- maintaining the safety and efficiency of the SRN

Contacting us

13. Our response to planning enquiries is locally led through regional spatial planning teams who know and understand the SRN in their areas (see Figure A). This enables us to provide:
 - a) strong intelligence, evidence and an understanding of how the SRN and surrounding local transport networks operate
 - b) information on relevant local factors
 - c) named contacts who are able to establish positive and productive relationships with all involved in the planning process
14. We would advise local stakeholders – planning officers, highways officers and development promoters – to focus their engagement with us via our regional spatial planning teams:
 - **South-East:**
planningSE@nationalhighways.co.uk
 - **South-West:**
planningSW@nationalhighways.co.uk
 - **East of England:**
planningEE@nationalhighways.co.uk
 - **Midlands:**
planningM@nationalhighways.co.uk
 - **North-West:**
planningNW@nationalhighways.co.uk
 - **Yorkshire and North-East:**
planningYNE@nationalhighways.co.uk
15. We also have a national spatial planning policy team who lead our corporate approach around supporting growth and our engagement with the planning system, including the writing of this guide. You can contact us at: spatialplanning@nationalhighways.co.uk.

16. In certain circumstances our Third Party Infrastructure team leads on our engagement with a given project. This is typically for Nationally Significant Infrastructure Projects (NSIPs) where the scale of the application itself or impact on the SRN requires a more strategic approach and longer-term, more resource-intensive engagement. Where this is the case, we will clearly communicate this with the development promoter and other relevant parties.

Limitations of this document

17. While this document sets out general principles by which we seek to engage and support the planning process, it cannot provide answers to all the questions that might arise. If you are uncertain about how to engage with us, or how we might approach a particular issue, please contact us at the email addresses provided.



Our role in planning

18. National Highways was appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. We are responsible for operating, maintaining and improving the strategic road network (SRN) in England, in accordance with our operating licence issued by the Secretary of State for Transport, and Government policies and objectives.
19. Paragraph 7 of the Department for Transport (DfT) Circular 01/2022 establishes three overarching objectives for us when engaging in the planning system:
 - To enable the delivery of sustainable development.
 - To support the needs of the freight and logistics sector.
 - To mitigate the impact of growth on the natural environment.
20. In exercising our function as a statutory consultee in the planning system, we must co-operate as reasonably practicable with other parties with regards to highways or planning⁶. We must also have regard to the environment and the safety of our road users. Consequently, we are obliged to consider all proposals received and to provide appropriate, timely and substantive responses to the local planning authority as the decision maker.
21. Our desire to be a proactive planning partner goes beyond just our statutory role and follows the spirit of our operating licence which stipulates that we should support local and national economic growth and regeneration. We would therefore strongly encourage you to engage with us as early as possible when considering planning matters that might have an impact on the SRN.

22. We also commit to co-operating with local highway authorities and recognise that we have a responsibility to support and develop a more coordinated approach to planning on the SRN and the local highway network, as well as with neighbouring jurisdictions and other key infrastructure providers.

Road Investment Strategy funding

23. The Road Investment Strategy (RIS) programme is the Government's primary means of investing significantly in the SRN. It provides 5-year programmes of funding to enable National Highways to operate, maintain and enhance the SRN in the context of the key priorities set out in each RIS. The ambitions for our network over the 5-year periods are set out in our *Strategic business plan*⁷ with our *Delivery plan*⁸ detailing how we will invest our funding.
24. Route strategies are one of the key steps of initial research in the development of a RIS - in May 2023 we published our Route Strategy Initial Overview Reports⁹. National Highways has produced route strategies since 2015 and these have guided the vision, performance expectations and investment plans for the SRN. In developing the latest route strategies, we have set out:
 - A planned set of future requirements for the network that is responsive to environmental needs; that accounts for the performance of today as well as the challenges and opportunities of the future.
 - Actions and investment that improve the performance of our roads for future road periods that are grounded in evidence and informed by interested parties and road user input.

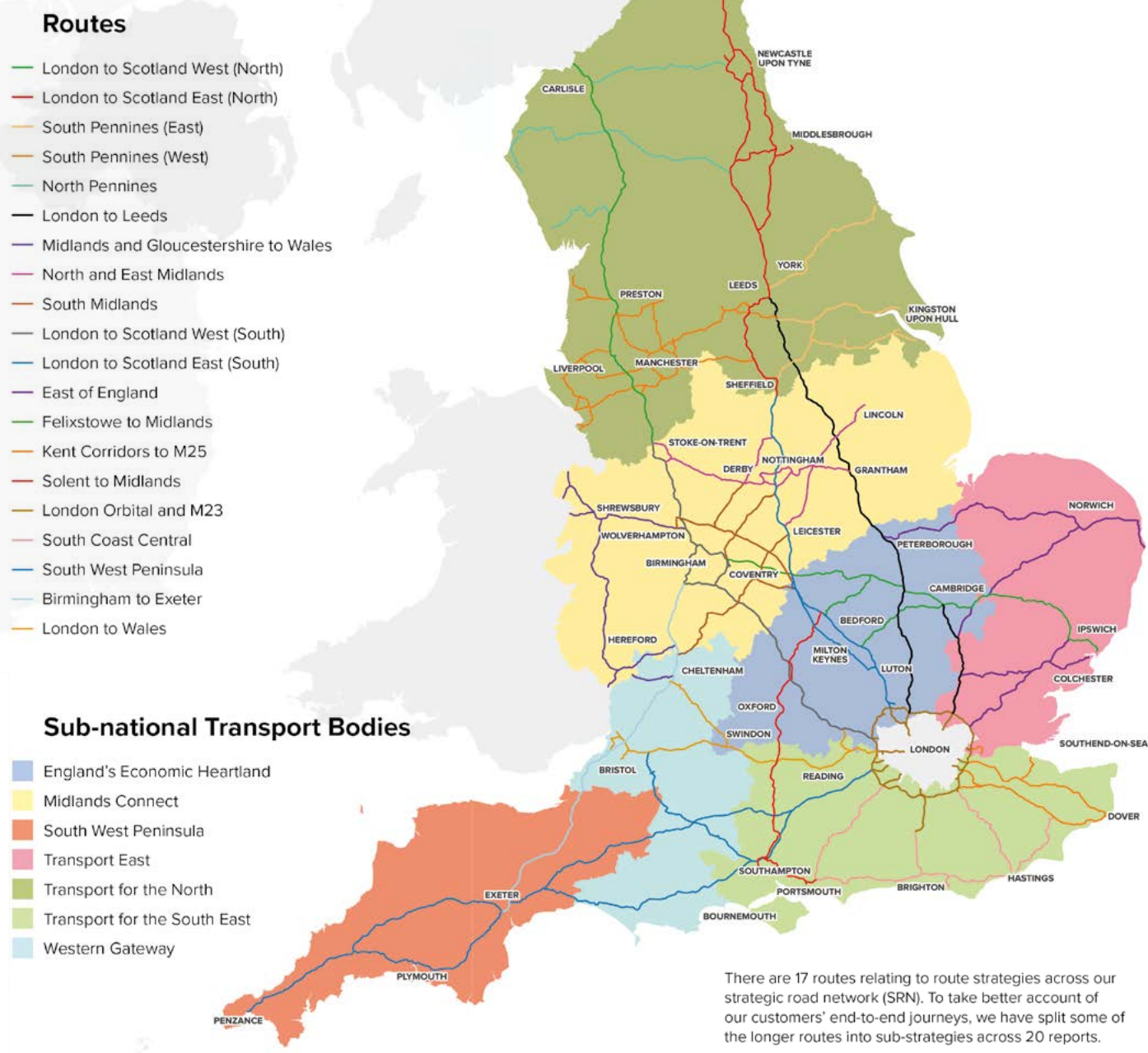
⁶ Section 5 of the Infrastructure Act 2015

⁷ <https://nationalhighways.co.uk/strategic-business-plan/>

⁸ <https://nationalhighways.co.uk/delivery-plan/>

⁹ <https://nationalhighways.co.uk/our-roads/our-route-strategies/>

Figure B: Route Strategies



- Opportunities for investment and integrated interventions that benefit the performance of our roads and meet wider connectivity needs of communities and economies.
25. In particular, we have identified future requirements for each route through collaboration with interested parties and road users, balancing the strategic need of our roads with the local needs of those using or living alongside them through:
- relevant local plans and priorities concerning local roads and other transport networks, wider socio-economic developments, and government policy
 - the need for effective integration with the rest of the transport system, including carrying out joint studies with other organisations where it benefits the SRN
 - the needs of each place contributing to connecting communities and supporting their growth aspirations
 - the views of relevant national and local interested parties and road users

Our approach to planning

Planning values

26. We are committed to six values that describe how we will always try to work when we engage in the planning system. We will:



Maintain safety

- We want everyone who uses and works on our roads to get home safe and well. By planning and designing roads that meet the highest levels of safety, we can reduce the number of fatal or serious injuries.

Work openly

- We are committed to being a proactive partner and will, at the earliest opportunity, assign a named officer who will work openly and collaboratively with you as you develop your plan or development proposal.

Engage early

- We encourage all parties promoting and preparing plans or planning applications that may have an impact on the strategic road network (SRN) to engage with us as early as possible so we can work together to deliver positive outcomes as quickly as possible. Our pre-application engagement service is offered in confidence¹⁰.
- Engaging early, such as through a pre-application process, gives all parties maximum time to understand the impacts of proposed development on the SRN, the level of assessment required to understand impacts, and to agree the most appropriate actions required as a result to help ensure the development proposal is sound and deliverable.

Share evidence

- Our *Route strategy initial overview reports*¹¹ set out our mid to long term strategies and needs for the SRN. Each report includes information on:
 - route characteristics
 - engagement with customers and neighbours
 - network collaboration
 - challenges and issues
 - initial route objectives
 - locational areas for consideration and potential collaboration
 - next steps

¹⁰ It should be noted that the Levelling-up and Regeneration Bill includes the following clause: “Power of certain bodies [including National Highways] to charge fees for advice in relation to applications under the planning Acts”.

¹¹ <https://routestrategies.nationalhighways.co.uk/>

- In addition, we collect and analyse significant amounts of information about the SRN and how it interacts with the local road network. This can be found on our Open Data website¹² and includes:
 - automated traffic count information, which is made available online through Webtris¹³
 - speed and flow information, which we can provide on request where it is available
 - several validated traffic models¹⁴ and land use models for certain areas of the network, which can be used by local authorities and development promoters to support decision-making and forecast the highways-related impact of future development
 - accident data
 - information on known local environmental issues
- We can provide access to other information and intelligence we hold about our network, where this is available, relevant to the development or proposal, and where we are legally entitled to do so.
- We can advise on how information should be used to identify and analyse potential highways-related impacts of your plans or proposed development, and to support the development of a robust transport evidence base for your plan or proposal.
- Where data needs to be extracted through a re-run of an existing model, we may make a reasonable charge for providing this and will provide quotes to those seeking such data at the earliest opportunity.
- Where the relevant data and models are not available, we work with the local planning authority, local highway authority and the development promoter to scope the work required.

Share knowledge and experience

- Our teams are highly experienced and knowledgeable about the complex issues of traffic management, driver behaviour, and the processes involved in the development, design and delivery of traffic schemes. We willingly share this knowledge and experience to help you ensure your plans and proposals are robust, appropriate and deliverable.

Work collaboratively

- We respond formally to consultations in a timely manner and with full regard to statutory requirements, as required at each stage of the planning process, whether this is for local plans, other statutory plans or planning applications.
- We also work with local authorities and other plan-making bodies prior to and between formal consultation periods to contribute to their thinking on the relevant plan, and support the analysis of options and development of robust plans and proposals that take full account of highways issues.



¹² <https://opendata.nationalhighways.co.uk/>

¹³ <https://webtris.nationalhighways.co.uk/>

¹⁴ Models are released under licence and may have limitations.

Key assessment considerations on planning matters

Principles of sustainable development¹⁵

27. In accordance with our operating licence, we will act in a manner which conforms to the principles of sustainable development and fulfil our role as a statutory consultee in the planning system.
28. New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.
29. Where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. It is also important to ensure that associated business uses and infrastructure are well sited – for example, employment space or the location of freight and logistics facilities. We will therefore expect those responsible for preparing local and neighbourhood plans to only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified.
30. The Government has recognised, however, that local planning and highway authorities need help when planning for sustainable transport and developing innovative policies to reduce car dependency. One of the ways the Department for Transport (DfT) has addressed this is by publishing a toolkit to provide advice to local authorities on planning and taking measures to reduce carbon emissions from transport¹⁶. More recently the Government has established Active Travel England¹⁷.

31. Another includes moving away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage'). We will support local authorities in achieving this aim through engagement at both plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location.

Vision-led approaches

32. Approaches such as 'decide and provide' involve two important elements: being vision-led and accommodating uncertainty. Both of these have been central in the creation of our long-term *Connecting the country*¹⁸ plan where we recognise that the future is uncertain and have adopted a 'decide and provide' approach where we have a clearer sense than ever before of our preferred vision for the future and the steps needed to make this a reality.
33. In broad terms, a vision-led approach can be summarised as follows:
 1. Establish a vision - understand the relevant national and local policy context; identify the drivers of change/key external factors acting on the plan or proposed development; set-out a place-based vision statement with associated outcomes that supports the principles of sustainable development.
 2. Develop scenarios - develop plausible future scenarios that help to understand the uncertainties that may impact on the ability to deliver the vision.

¹⁵ See paragraphs 11 to 17 in DfT Circular 01/2022.

¹⁶ <https://www.gov.uk/government/collections/transport-decarbonisation-local-authority-toolkit>

¹⁷ <https://www.gov.uk/government/organisations/active-travel-england>

¹⁸ <https://nationalhighways.co.uk/our-roads/future-roads/connecting-the-country/>

3. Generate options – generate, sift and prioritise options that can help achieve the vision.
 4. Test options – test how the prioritised options perform in each of the plausible future scenarios (for example, is every option effective in all scenarios or are some less resilient and have some significant risks?).
 5. Produce a vision strategy – produce a strategy for realising the vision that accounts for the identified uncertainty and includes a ‘monitor and manage’ approach to identify and address when the vision is unlikely to be achieved.
34. The vision-led approach is relevant to both the plan-making and decision-taking stages (proportionate to the scale, sensitivity and complexity of the development proposal).
 35. The DfT has addressed future uncertainty in the transport system in its *TAG Uncertainty Toolkit*¹⁹ and it is anticipated that further guidance on vision-led approaches will be forthcoming in due course, including in the Local Transport Plan Guidance due to be published by the DfT in late 2023. In the interim, there is relevant advice in the public domain including from TRICS Consortium Ltd²⁰ and Mott Macdonald/University of the West of England²¹.
 36. In engaging with local authorities and development promoters, we will seek to use our *Connecting the county* plan and relevant route strategy/strategies²² to help inform the vision for a local plan or development proposal.

Ensuring highways issues are addressed

37. Chapter 9 of the *National Planning Policy Framework* (NPPF) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The policy test on whether the residual cumulative impacts on the SRN would be ‘severe’ will be assessed on a case-by-case basis. This will take into account the performance and character of the relevant link or junction of the SRN, and the predicted effects of the development on its safe operation.
38. In terms of infrastructure provision to support the freight and logistics sector, the NPPF further states that planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.
39. Transport assessments should be carried out in line with prevailing government guidance and industry standards in agreement with us, through pre-application and scoping²³. Where modifications to the SRN are proposed, schemes must be subject to road safety, environmental and any other relevant assessment. Local authorities and developers also need to ensure that their proposals comply with requirements for access, design and audit as set out in the *Design Manual for Roads and Bridges* (DMRB)²⁴.

19 <https://www.gov.uk/government/publications/tag-uncertainty-toolkit>

20 <https://www.trics.org/decideandprovideguidance.html>

21 <https://www.mottmac.com/article/59966/futures-vision-led-planning-for-an-uncertain-world>

22 <https://nationalhighways.co.uk/our-roads/our-route-strategies/>

23 See also paragraphs 47 to 54 in DfT Circular 01/2022.

24 <https://nationalhighways.co.uk/suppliers/design-standards-and-specifications/design-manual-for-roads-and-bridges-dmrbr/>

40. Although identification of the scale and nature of action required to support a particular development is the responsibility of the development promoter, we will advise on options for this and share with you any relevant information we hold to help you make informed decisions. The issues can be complex and take some time to work through, so we encourage engagement with us at the earliest opportunity.
41. It is important to note that the continued safe operation of the SRN will remain our primary consideration, even where proposals would not result in capacity issues.

New connections and capacity enhancements²⁵

42. We recommend any third party looking to propose works on the SRN engage with us as early as possible. This is so we can establish whether the principle of proposed works is acceptable, or what is needed to determine this, and to identify the potential impacts of any schemes on the SRN.
 43. Where relevant, planning conditions will be recommended to the local planning authority to ensure any third party works on the SRN are delivered as agreed.
 44. Where third party works are proposed as part of a Nationally Significant Infrastructure Project (NSIP) this may be subject to additional guidance and processes. For more information on NSIPs please see the 'Other statutory engagement' section.
- ### **Environmental impact²⁶**
45. Development promoters will need to provide sufficient environmental information to satisfy the relevant local planning authority, and any other consenting authorities, that all environmental implications of the proposals have been appropriately considered.
 46. We will expect to see measures implemented that fully mitigate all environmental impacts arising from and relating to the interaction between developments and the SRN. There are four aspects to this:
 - The environmental impacts arising from the temporary construction works.
 - The environmental impacts of the permanent transport solution associated with the development.
 - The environmental impacts of the road network upon the development itself (for example, vehicle emissions).
 - The environmental impacts of any decommissioning phase.
 47. To assist in this process, we will willingly participate in the screening and scoping processes to help identify any significant transport-related environmental impacts of proposals.
 48. To avoid potential delay or challenge, transport assessments and environmental statements should be mutually consistent and pay due regard to each other.
 49. If a development promoter wishes to use land within the highway boundary (including landscaped areas) for the storage of construction materials or other such reasons, they should discuss this at the earliest opportunity with the relevant regional spatial planning team.

²⁵ See paragraphs 18 to 25 in DfT Circular 01/2022.

²⁶ See paragraph 55 in DfT Circular 01/2022.

Physical impact of development on the SRN²⁷

50. There may be development proposals that the relevant local planning authority is not statutorily required to consult us on, but which nonetheless have the potential to impact the SRN. Examples include where there are considerations relevant to fire hazard, glint and glare, stability of embankments and cuttings, integrity of structures, water run-off, air quality, highway schemes on the local road network, or visibility of traffic signs. Development promoters and local authorities are encouraged to identify such potential risks and discuss these with us at the earliest opportunity so they can be quantified and addressed as necessary and appropriate.

Roadside facilities²⁸

51. We recognise the importance of roadside facilities for the safety and welfare of road users. We also recognise that lorry parking and adequate facilities are key to enabling the freight and logistics sector to operate safely and efficiently.
52. New and existing roadside facilities are subject to the provisions in DfT Circular 01/2022 which sets the framework for local planning authorities to consider the planning proposals for such developments and requirements for which operators must comply in order to be signed from the SRN.

53. Local planning authorities, development promoters and operators are encouraged to discuss with us at the earliest opportunity any proposals to develop new roadside facilities or to alter and/or sign existing sites. All such proposals should be referred to: roadsidefacilities@nationalhighways.co.uk.

Special types of development²⁹

54. The DfT Circular 01/2022 provides policy advice in relation to the following 'special types of development':
- advertisements
 - gateway structures and public art
 - electronic communications apparatus
 - on-shore wind turbines
 - developments with solar reflection
55. Other 'special types of development' will be kept under review where they have the potential to impact on the SRN.



27 See paragraphs 57 to 59 in DfT Circular 01/2022.

28 See paragraphs 71 to 112 and Annex A in DfT Circular 01/2022.

29 See paragraphs 60 to 70 in DfT Circular 01/2022.

Engagement with plan-making³⁰

General principles

56. Local plans and spatial development strategies set out policies and allocations to guide development in a locality, including proposals for specific sites to meet the housing, employment, environmental and social needs of the area. The suitability of sites for any of these uses depends on several factors, including local traffic flow, road and transport connections, and options for sustainable travel.
57. The preparation of plans and strategies provides an opportunity to support developments that reduce the need to travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all. This can contribute to the achievement of net zero carbon objectives and reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.
58. For all these reasons, we are keen to contribute to the development of local plans and spatial development strategies. We can help you identify the most suitable locations for development that make best use of the capacity on the strategic road network (SRN); so, we encourage plan-making authorities to engage with us from the earliest stages of preparation. Figure C, at the end of this section, sets out how we see ourselves engaging with plan-making authorities.

Evidence base

59. Paragraphs 31 to 33 of the Department for Transport (DfT) Circular 01/2022 set out the key considerations relating to the transport evidence base that should inform decisions at the plan-making stage. This includes the expectation that this process will explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.
60. We will support evidence base work where we are able to, as well as share evidence that we have, and input our knowledge and experience of the SRN.

Location of development

61. Development should be promoted at locations that are or can be made sustainable, that facilitate the uptake of sustainable transport modes, support wider social and health objectives, and which support existing business sectors as well as enabling new growth.
62. We will work with plan-making authorities, highway authorities and development promoters to identify opportunities to introduce travel reduction and demand management measures through the plan-making process.



³⁰ See paragraphs 26 to 38 in DfT Circular 01/2022.

Site allocations

63. When a local plan or spatial development strategy proposes site-specific allocations, we will want to ensure that all relevant transport impacts and requirements are considered. To this end, we will work with plan-making authorities to:
- identify the impact that the proposed allocations are likely to have on the SRN on an individual and, insofar as is necessary, a cumulative basis, factoring in the demands arising from development planned in adjacent authorities where appropriate
 - assess the impact of the SRN on the development potential of sites that are proposed to be allocated (for example, vehicle emissions, light pollution and noise)
 - consider travel plan, travel demand and off-network improvements
 - as necessary, identify the infrastructure requirements and delivery of strategic infrastructure for the proposed allocations
64. Whilst allocating land for particular uses is a matter ultimately for plan-making authorities, we will provide comment on the suitability of locations where there is potential impact on the SRN, including from a safety, congestion, amenity and carbon emissions perspective. Certain allocations should also recognise the importance of providing and retaining adequate provision of lorry parking facilities, particularly in relation to proposals for new or expanded goods distribution centres and roadside facilities.

New connections and capacity enhancements (local plans)

65. Paragraphs 19 and 29 of DfT Circular 01/2022 set out that new connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process. Where all reasonable options to deliver modal shift, promote active travel and public transport use, and locate development in areas of high accessibility have been exhausted, we will work with plan-making authorities in identifying funding mechanisms for planned works to the SRN.

Summary of local plan considerations

66. When formally consulted on development plan documents we will seek to provide a recommendation as to the appropriateness of proposed policies and allocations in relation to their interaction with the SRN. Where we have been engaged in the development of the plan or strategy, this process should be straightforward.
67. The list below highlights matters which we are likely to have particular interest in when engaging in the plan-making process, which is grouped into four categories:

Sustainability

- The **sustainability of policies** including how they have addressed the principles of sustainable development³¹ and support a place-based vision-led approach (informed by our Connecting the County³² plan and relevant route strategy/strategies³³).
- The **economic, social, and environmental benefits** of development plan policies and proposed site allocations.

31 See paragraphs 11 to 17 in DfT Circular 01/2022.

32 <https://nationalhighways.co.uk/our-roads/future-roads/connecting-the-country/>

33 <https://nationalhighways.co.uk/our-roads/our-route-strategies/>

Integration with other plans and strategies

- **Proposed works** to the transport network, including measures relating to sustainable travel infrastructure and delivery plans, including the anticipated costs and funding source(s) as well as the forecast outcome of the enhancement(s).
- **Our investment priorities** as identified in our *Delivery plan*³⁴ and route strategies³⁵.
- The **consistency** between the policy approach being promoted in the plan or strategy and any associated evidence base documents such as infrastructure delivery plans, where these would impact the SRN.
- The relationship between the plan or strategy and the relevant Sub-national Transport Body's **Strategic Transport Plan**.

Impacts

- The way in which the size, type and location of development proposals **impact on the operation of the SRN**.
- The **cumulative impacts** on the SRN associated with any known development sites within the plan area and in adjacent areas.
- Any **residual impacts** arising from the proposals that will not be mitigated by new connections or capacity enhancements.

Robustness and consistency

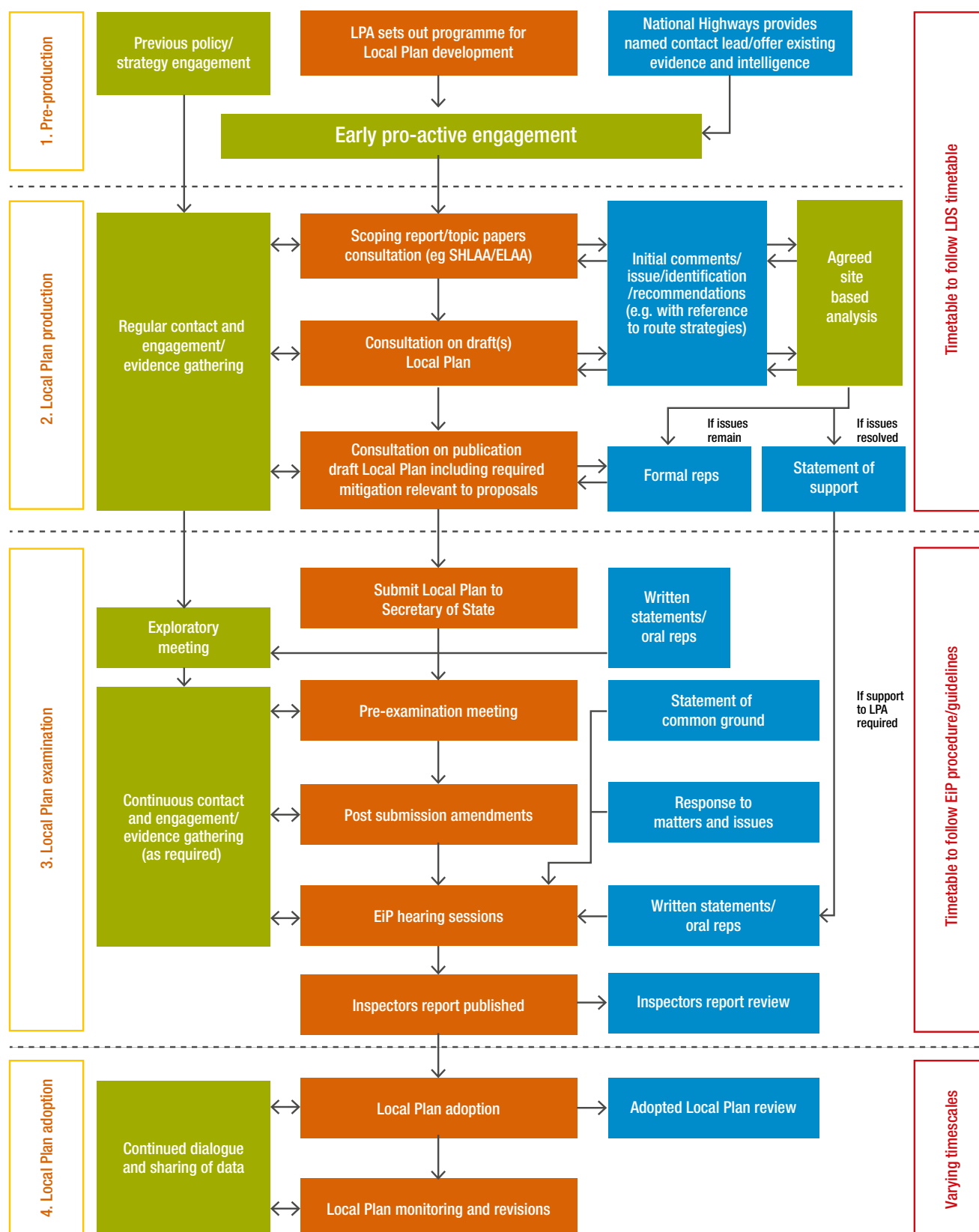
- The **robustness of the evidence base** that has informed decisions.
- The **methodology** used to determine the quantities, locations, likely phasing and mix, and viability of housing and employment development.
- The **accessibility** of sites that are proposed to be allocated.

68. Where appropriate, we will seek to participate in the plan examination.
69. We would wish to be advised of the publication of the Inspector's Report as soon as is practicable so we can consider the implications of the recommendations in a timely manner, and then work with the plan-making authority on modifications as necessary.
70. Once development plan documents are adopted, we will continue to work with plan-making authorities to ensure that relevant National Highways teams are fully cognisant of their policies and proposals, to confirm that up-to-date information about the SRN is used when such plans are reviewed, and to support the delivery of development.

34 <https://nationalhighways.co.uk/delivery-plan/>

35 <https://nationalhighways.co.uk/our-roads/our-route-strategies/>

Figure C: National Highways engagement with plan-making authorities



Key:

- The **blue boxes** identify what we will do.
- The **orange boxes** identify the key stages in the plan-making process from the perspective of the plan-making authority.
- The **green boxes** identify actions for both parties and relate mainly to engagement between ourselves and the plan-making authority.

Engagement with decision-taking³⁶

General principles

71. We encourage stakeholders to talk with us as early as possible where we are likely to be consulted on a planning application. This allows time for us to guide applicants and their consultants on preparing all the information we will need to fully consider the proposed development. Effective pre-application engagement is essential in meeting statutory deadlines later in the planning process. Figure D, at the end of this section, sets out how we engage with development proposals.
72. Where we are made aware that significant development proposals are being prepared that might impact the strategic road network (SRN), and we have not been engaged in pre-application discussions, we may contact the applicant through the local planning authority and invite them to scope the submission with us.
73. Paragraph 48 of the Department for Transport (DfT) Circular 01/2022 states that where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. Where such development has not been identified in an up-to-date development plan (or an emerging plan that is at an advanced stage), developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes and would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites.



74. In submitting a planning application, the development promoter should provide all the information we will need to fully consider the interaction of the development with the SRN, and the suitability of any related actions proposed.
75. We will provide the relevant authority with our response to the assessed transport impact in line with DfT Circular 01/2022, the principles in this document and our statutory requirements. Our advice will reflect our conclusions on the likely impact of the proposal, as a result of assessing the transport-related information provided with the application, and drawing on our own expertise, knowledge and experience of the SRN and transport issues.
76. Where appropriate, we will recommend that planning conditions be attached to any planning permission granted, in order to address or reduce the effects that are predicted to occur. Wherever possible, we will make this recommendation in discussion with the applicant and local planning and highway authorities, as appropriate.

³⁶ See also paragraphs 39 to 59 in DfT Circular 01/2022.

Pre-application stage

77. The *Town and Country Planning (Development Management Procedure) (England) Order 2015* sets out the legal requirements for local planning authorities to consult with us at application stage. However, we would encourage development promoters to engage with us earlier and to think more broadly than these minimum thresholds.
78. Pre-application discussions are an effective means of gaining a good, early understanding of the development, its benefits, its likely impacts and its infrastructure needs. Engaging with us at pre-application stage will ensure that the transport assessment is appropriately scoped and based on the most relevant and up-to-date data. It will also ensure that the development promoter is made aware of, and can take account of, any SRN issues that might have a bearing on how the development is planned and/or delivered. This, in turn, helps to avoid abortive work being undertaken.
79. When contacted in respect of any development proposal, we will engage in line with our planning principles. Specifically, we will:
- **Acknowledge** within 7 days to a request for initial discussion.
 - Provide a **named contact** for discussions, which will be someone with knowledge and experience of the area.
 - Advise the promoter whether the development proposal is likely to be **of interest** to us.
 - Advise the promoter of **known potential constraints** to the development, and jointly explore **potential solutions** within the context of a **vision-led approach** that facilitates a reduction in the need to travel by private car.
 - **Share** data and models relevant to the proposal, where this is available, and where we are legally entitled to do so.
- Review, comment on and, where acceptable, agree the **methodology** for assessing the likely impacts of the proposed development, as relevant to the SRN and net zero carbon considerations.
 - Review, comment on and, where acceptable, agree the principles of the scale and nature of **mitigation** required.
 - Review, comment on and, where appropriate, agree the principles of the **monitor and manage** strategy.
 - Discuss any other elements of the development or its likely impact that might be of interest to us.
80. Where it is likely that a proposal will be considered unacceptable in terms of its impact on the SRN, we will provide guidance as to what, if any, steps could be taken to address the concerns that we have.
81. Depending on the nature of the site and the proposed development, the development promoter may submit a written scoping report or arrange a meeting with us. Where a meeting is arranged, we would encourage other relevant parties to attend as necessary, including the local planning and highway authorities; we would particularly recommend this for larger and more complex sites.
82. If a scoping report is to be prepared, we would advise this includes:
- **details of the development**, such as location, access arrangements, use class, size or number of units, likely phasing, number of parking spaces and any other relevant information
 - a proposed methodology for the **vision-led approach** (including a monitor and manage strategy) that facilitates a reduction in the need to travel by private car
 - a proposed methodology for estimating the **vehicular trip generation** and distribution on the SRN, and resulting trip generation figures

- a proposed methodology for assessing the **impact** of this trip generation on the SRN and our assets
 - a proposed methodology for assessing the **environmental consequences** of the transport impacts of the development, and proposals to address net-zero carbon considerations
83. We will allow local authorities and development promoters access to all relevant data and models that we hold where this is readily available, free of charge. However, usage of data and models may be restricted at later stages in the process by our need to assess a proposed development within statutory timeframes.

Travel plans

84. In support of the principles of sustainable development and a place-based vision-led approach, we expect development promoters to bring forward sites in highly accessible locations and support initiatives that reduce the traffic impact of proposals. This is particularly necessary where the potential impact is on sections of the SRN that could experience capacity problems in the foreseeable future.
85. Early engagement enables us to support this thinking, and we will work with development promoters and local planning authorities to identify appropriate measures to facilitate the delivery of sustainable development.
86. The preparation, implementation, monitoring and updating of a robust travel plan that promotes the use of sustainable transport modes (such as walking, wheeling, cycling and public transport) can be an effective means of managing the impact of development on the road network, and reducing the need for major transport infrastructure. This contributes to the ongoing effectiveness of the SRN in ensuring swift connections nationally and regionally, minimising delays and congestion. Retaining some network capacity within the SRN also facilitates the provision for further developments.

87. We will cooperate with local planning authorities, local highway authorities, Active Travel England and development promoters in the creation of travel plans that identify opportunities to introduce route-based and/or area-wide travel plan measures that will support sustainable transport. We expect such plans to be supported by robust performance indicators which can be effectively monitored.
88. However, quite often the implementation of travel plan measures alone will not be sufficient to reduce the traffic demand of proposed developments to acceptable levels. In such instances we will work with relevant authorities to determine whether the implementation of other measures (e.g. more direct demand management measures) could regulate traffic flows. This will support the delivery of the travel plan outcomes and maximise efficient use of available capacity on the SRN.

New connections and capacity enhancements (planning applications)

89. As stated previously, paragraphs 19 and 29 of DfT Circular 01/2022 set out that new connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process. Paragraph 43 adds that we expect development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements and new connections on the SRN.
90. Where the principle of such works is accepted, we will work with a developer's transport consultant and other key stakeholders to establish the mitigation that is needed to appropriately support the scale and type of development. In circumstances where there is insufficient information to determine whether there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe, we will recommend that the application is not approved until further assessment work has

been carried out, allowing for a more definitive recommendation.

91. Where physical changes to the SRN are proposed to support a planning application, a Walking, Cycling & Horse-Riding Assessment and Review, and a Stage 1 Road Safety Audit should be prepared before planning permission is applied for. Pre-application engagement with us is particularly important in this situation.
92. Measures to address a development's impact upon the SRN will normally be delivered by means of a funding agreement between the development promoter(s) and ourselves, such as an agreement under Section 278 of the Highways Act.

Preliminary design requirements

93. The design elements that are considered essential and that should be provided prior to planning permission being granted, to enable us to properly assess the impact of proposals on the SRN, are as follows:

General Arrangement drawings

- General Arrangement drawings should include the existing and proposed road or site layout, drainage outfalls and any proposed attenuation, any environmental mitigation such as noise barriers or landscaping, and visibility splays for any proposed development access from our network. Depending on the scale and complexity of the proposals, development promoters may also be required to provide us with other drawings, such as land ownership, proposed cross section/levels and the existing ground levels.

Statement of compliance with Design Manual for Roads and Bridges (DMRB) standards

- Development promoters should provide a clear statement identifying which standards have been used in the development of the design and evidence of any discussions around departures from standards. Where proposals include a departure from

standards, they will need to be shown on the General Arrangement drawings.

Traffic Regulation Order

- Where development promoters have agreed a Traffic Regulation Order with the relevant local highway authority, or have a proposed Traffic Regulation Order not yet agreed, these should also be provided. Any agreed speed limits, parking restrictions, weight limits, one-way streets and prohibited turns should also be identified on the General Arrangement drawings.

Drainage strategy

- For developments adjacent to the SRN, a document should be provided identifying the site-specific drainage strategy and discharge requirements. This should include, but is not limited to, how the development meets drainage regulations, proposed outfalls and discharge rates, proposed attenuation requirements, surface and sub-surface water collection methodology and maintenance, pipe network methodology and maintenance and flood modelling results.

Lighting strategy

- This should identify all areas of proposed lighting compliant with the methodology set out in the DMRB, specifically TA 501, and allow us to assess the environmental impact of proposals. Lighting should also be clearly identified in the General Arrangement drawings.

94. Each scheme is different, and these are general guidelines for the information we need to progress our response to planning application consultations. Detailed design guidance is provided in the DMRB, and for larger and more complex schemes our team will provide more tailored guidance and advice as to what design elements are essential at the planning application stage.

95. On occasion we may also require the following, but this will be on an as-needed basis or subject to planning conditions. These are as follows:

- Highway engineering details
- Geotechnical investigation or design
- Approval in principle or technical approval of structures
- Detailed drainage design and specification
- Road lighting designs
- Glint and glare assessment
- Detailed traffic management proposals
- Detailed technical specification



Our formal responses to local planning authorities

96. Within the statutory consultation period for a planning application, we will respond in writing to local planning authorities with a formal recommendation that will take one of the following four forms:

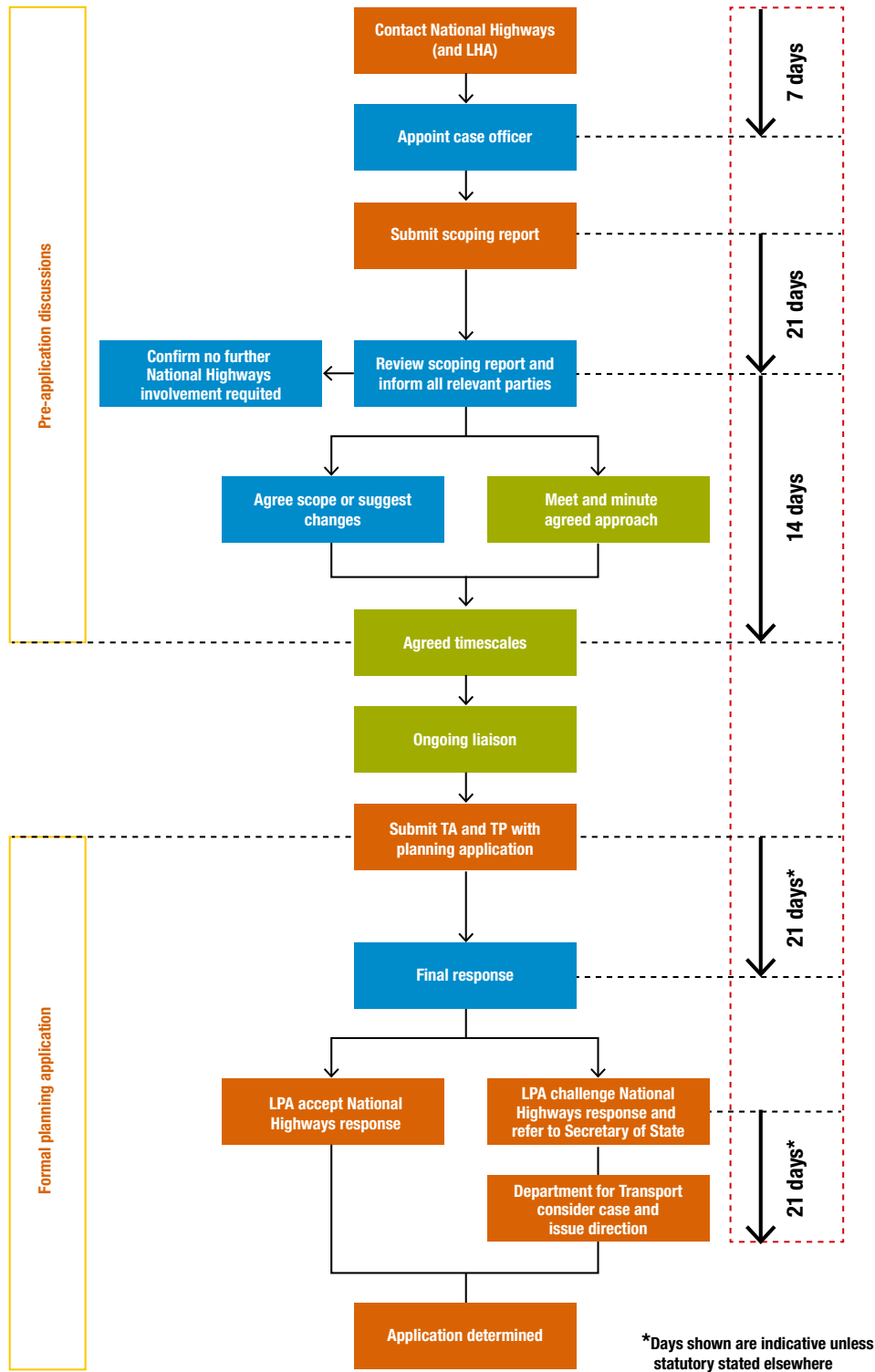
- a. Offering no objection to the development.
- b. Recommending conditions that should be attached to any planning permission that may be granted by the local planning authority.
- c. Recommending that permission not be granted for a specified period, usually to allow for the provision of any missing information or to allow for negotiations with the development promoter.
- d. Recommending refusal.

97. For all the above we will provide the local planning authority with a statement explaining our position and the assessment and analysis behind it. As per the conditions of our licence, we will also copy these responses to the Secretary of State for Transport.

98. Where a local planning authority decides that it does not wish to accept our recommendation, they must refer the case to the Secretary of State for Transport as soon as practicable³⁷. The decision of the Secretary of State will be binding on all parties.

³⁷ <https://www.gov.uk/guidance/development-affecting-trunk-roads-how-local-planning-authorities-can-challenge-a-national-highways-recommendation>

Figure D: How we engage with development proposals



Key:

- The **blue boxes** identify what we will do.
- The **orange boxes** identify the key stages in the decision-taking process from the perspective of the development promoter or local planning authority.
- The **green boxes** identify actions for both parties and relate mainly to engagement between us and the local planning authority.
- The flow chart indicates a desired maximum duration for these stages to be completed, unless longer timescales are agreed beforehand by the relevant parties, such as on large or complex applications.

Other statutory engagement

Nationally Significant Infrastructure Projects

99. As a statutory consultee in respect of Nationally Significant Infrastructure Projects (NSIPs), the promoters of such developments are required to consult with us where their proposals are likely to affect road or transport operations and/or planning on roads for which we are the highway authority. As with other planning matters, we recommend that you enter discussions with us at the earliest opportunity.
100. Promoters are encouraged to seek consensus with interested parties, including us where applicable, in order to satisfy the Planning Inspectorate that full and thorough pre-application consultation with interested parties has been carried out. Where possible, we will work towards agreeing a Statement of Common Ground at an early stage so that this can be an input to the examination.
101. In any case, when submitting the application and draft submission to the Planning Inspectorate (known as a Development Consent Order), promoters must provide sufficient detail to allow the assessment of the impact of their proposals on the SRN, and the suitability and deliverability of their proposed transport arrangements, including means of access.
102. Where necessary we will make representations on proposals and seek to ensure that requirements we deem essential are incorporated in the Development Consent Order. These actions will be carried out based on discussions held and the information provided to us.

Local Development Orders and Neighbourhood Development Orders

103. Local Development Orders and Neighbourhood Development Orders will be assessed in the same manner as planning applications. The relevant processes allow for compliance conditions to be imposed by the body making the Order. Should we consider that compliance conditions must be applied to mitigate the anticipated impact of development, we will work with the body making the Order with the intention of agreeing the inclusion of appropriate conditions. This might include conditions on the timing, scale or design of development.

Other development plans

104. Neighbourhood Development Plans and associated Orders³⁸ also have the potential to impact the strategic road network (SRN). Therefore, we will work proactively and collaboratively with parish councils and neighbourhood forums in the development and implementation of their proposals, applying the approach described above.



³⁸ Including Community Right to Build Orders.

Funding

105. Where a landowner or development promoter proposes changes to the strategic road network (SRN) to serve a particular development, they are usually required to enter into an agreement with us to make these changes. Funding is often required to resource these interventions, but the scale of funding required will vary from case to case.
106. With this in mind, this document does not comprehensively cover each funding mechanism or scenario. Instead, we set out our general approach, having particular regard to the process under Section 278 of the Highways Act, the most common mechanism used for procuring works.
107. We will support proposals for third party investment into transport and highways schemes that enable sustainable development whilst maintaining the safe and efficient movement of goods and people on the SRN.
108. Our teams are experienced in exploring funding options and in delivering funding agreements for transport schemes and will be able to advise on the specific requirements of a particular scheme. As with other stages of the planning process, we encourage engagement with us as early as possible. Where public funding is sought to support schemes, we expect to be consulted and may contribute towards the application process.
- seek to progress the detailed design and draft the Section 278 agreement in parallel with the planning process rather than delaying this work until planning approval is given. Nonetheless, the Section 278 agreement cannot be entered into and works cannot commence until planning permission for the development is in place and any relevant conditions have been satisfactorily discharged.
111. A programme for reporting on progress will be agreed and an 'open book' approach taken to the assessment of scheme costs. Our administrative costs will be based on the published schedule; the development promoter will be required to meet all costs associated with the development and delivery of the Section 278 agreement.
112. Depending on the form of agreement and the likely cost of the scheme, payment(s) may be made in stages, unless agreed otherwise. Under normal circumstances further work will only be undertaken when: we have received money from the promoter to cover the costs of that work; or an Abortive Cost Undertaking backed by a financial undertaking has been entered into by the promoter.
113. Underspend(s) left over at the end of each task or stage can be rolled over to meet costs of the next stage or repaid to the development promoter. Any money which has been paid to us that has not been spent in delivering the scheme will be repaid to the development promoter once the scheme is complete or cancelled.

Third party funding agreements

109. Where a Section 278 agreement is appropriate, a named officer will be identified as the development promoter's main point of contact for all matters related to the delivery of the agreement and works. This may be different from the individual leading on our involvement in the planning application process. Where this is the case, we will ensure a joined-up approach and that where necessary, any handover is comprehensive.
110. In order to enable the scheme to be delivered expediently, the development promoter may
114. Where possible, in situations where the Section 278 agreement involves both us and local highway authorities, a single agreement will be proposed with all the respective highway bodies working collaboratively on the agreed mitigation.
115. For further information about third party funding for mitigation, development promoters are encouraged to contact the relevant regional spatial planning team.



Key contacts

Location based planning enquiries:

South East:

planningSE@nationalhighways.co.uk

South West:

planningSW@nationalhighways.co.uk

East of England:

planningEE@nationalhighways.co.uk

Midlands:

planningM@nationalhighways.co.uk

North West:

planningNW@nationalhighways.co.uk

Yorkshire and North East:

planningYNE@nationalhighways.co.uk

Other planning enquiries:

Roadside Facilities:

roadsidefacilities@nationalhighways.co.uk

This document, as well as strategic planning issues: spatialplanning@nationalhighways.co.uk

Acronyms

DfTDepartment for Transport

DMRBDesign Manual for Roads and Bridges

EiPExamination in Public

ELAAEmployment Land Availability Assessment

LHALocal Highway Authority

LPALocal Planning Authority

NPPFNational Planning Policy Framework

NSIPNationally Significant Infrastructure Project

RISRoad Investment Strategy

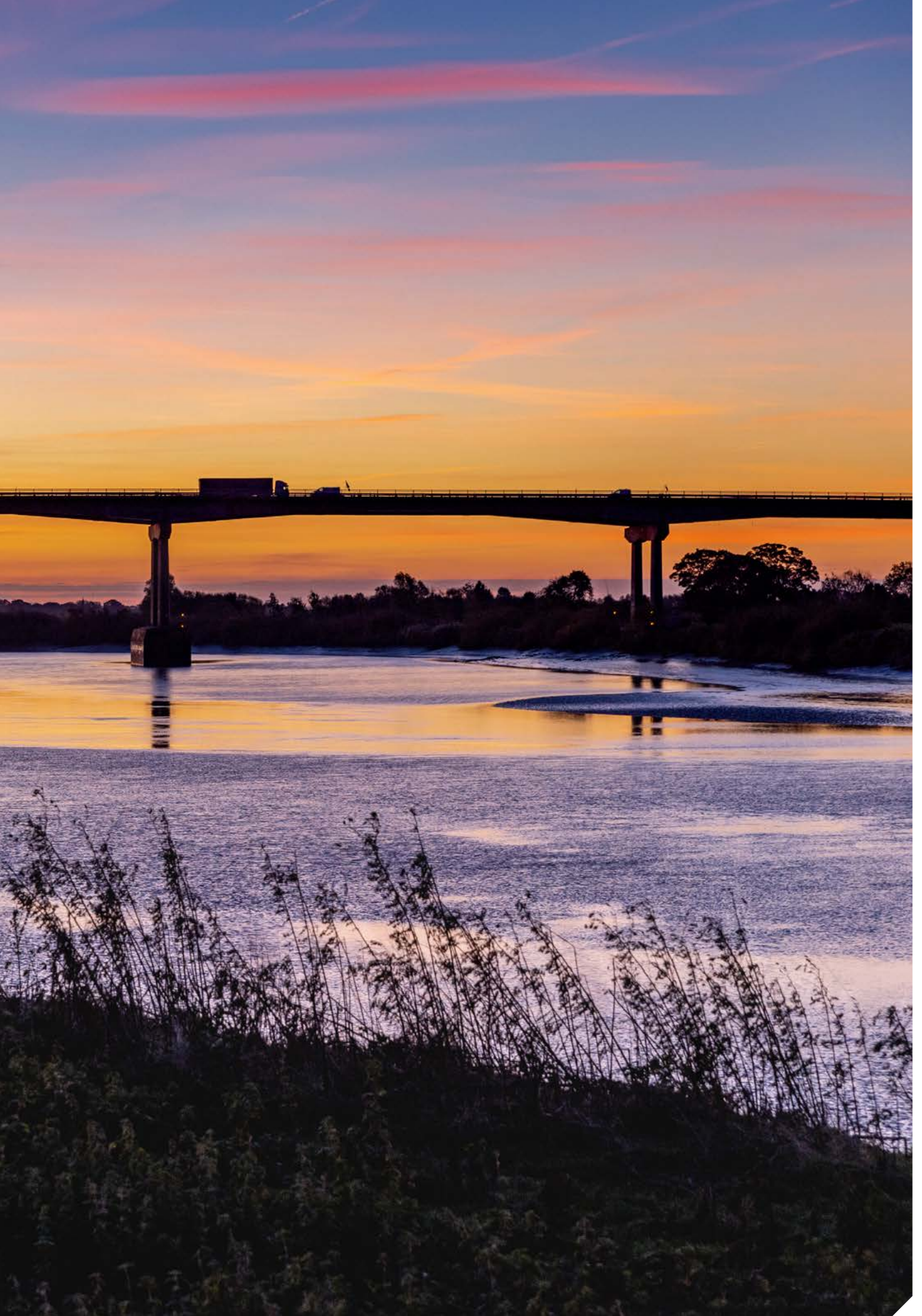
SHLAAStrategic Housing Land Availability Assessment

SRNStrategic Road Network

TATransport Assessment

TPTravel Plan





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National Highways creative job number CRE23_0370

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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

National Highways Limited registered in England and Wales number 09346363