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Sent by email to:
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Dear Sirs

Update of the strategic road network and the delivery of sustainable development (circular 02/2013)

Thank you for the opportunity to respond to the update of the strategic road network and the delivery of sustainable development (circular 02/2013) consultation. England's Economic Heartland represents 13 Local Transport Authorities, but we note that this update impacts the roles of both planning and highway authorities.

As a sub national transport body and in line with the regional transport strategy, published in February 2021, we welcome the change to requirements to support the promotion and uptake of more sustainable modes of transport. We also welcome the principle that development must be planned in the right places so it can be served by sustainable transport infrastructure. This will be an expectation by National Highways (NH) before capacity enhancements can be considered.

The approach set out already supports that being taken by our planning and highway authorities. However, it does not specifically reference potential for Strategic Road Network (SRN) for supporting more sustainable transport modes, especially bus priority measures and long-distance coach opportunities. This is increasingly important in the EEH region as highlighted in our emerging Connectivity Studies (e.g. Northampton to Brackley bus links via A43, and improvements on the A34 between Abingdon and Oxford in Oxfordshire).

In addition, and in line with our regional transport strategy, EEH welcomes paragraph 37 of the document regarding general support for active modes of travel. However, we would want to support a more specific reference to the SRN enabling delivery of sustainable transport networks, both active travel and public transport. It is not only freight and private vehicles that should be able to have access to the SRN.

We note the recognition of the transport decarbonisation plan and the move away from 'predict and provide' to 'vision and validate'. This supports some of our Local Authorities move towards a more 'monitor and manage' and "decide and provide" approach to mitigating the impact of new developments, especially in a post covid environment. That said, there should always be sufficient infrastructure provided to mitigate the impact of a development. Equally Local Plans should always be developed with the fair expectation that there is sufficient infrastructure funding to support sustainable growth and development.

EEH welcomes the recognition that the document provides towards the role of travel plans in delivering sustainable development and that development promoters should enable a reduction the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements and new connections on the SRN. Most local transport authorities already require travel plans as standard practice as part of major development proposals.

We note that new developments will need to consider provision for broadband infrastructure, cycle parking, provision of mobility and micro-mobility hubs in larger schemes, and provision of high powered and open-access electric vehicle chargepoints in developments that include on-street or communal parking, to support the Government's commitment to decarbonise transport by 2050. (Paragraph 44). EEH supports this however, there is some local concern that these requirements would likely serve a more expensive vehicle type, would reduce availability of on-street shared parking for more affordable dwellings, which currently have the lowest uptake in EVs due to cost. There are also concerns that these additional requirements could impact on a development's viability and, in lower cost areas, be delivered at the expense of important infrastructure such as affordable housing. These are important considerations that I would encourage you to discuss in detail with the Department for Levelling Up, Housing and Communities.

In response to access to the SRN to support local growth. We recognise the role of the Strategic Road Network is for more strategic longer distant journeys. Paragraph 21 confirms the existing position that there will otherwise be no new connections on high-speed routes, with limited exceptions. However, EEH and our local authority partners would not like to see land that is suitable for development being landlocked as a result of inaccessibility from high-speed roads, especially new SRN infrastructure.

The decision to locate new housing or commercial land is best determined through a collaborative process where transport solutions should be considered in a holistic place – specific manner – removing modal silos. Equally, if transport provision from development should be away from the highway network, DfT must ensure sufficient funds are available from the outset to plan the most appropriate transport solution. At present, funding for road-based mass transit schemes, such as a bus based MRT, have no funding opportunities available to them. Without funding, a local authority cannot plan the provision of public transport that would be needed to support the volume of growth that the Heartland region is supporting.

Paragraph 28 is a welcome clarification of NH's role in the plan-making process. As a statutory consultee in the planning system, National Highways is obliged to provide appropriate, timely and substantive responses in the plan-making process. However, there is some confusion if NH has a statutory role in plan making and clarification is required.

Paragraph 31 establishes the requirement for plans to meet the needs of storage and distribution operations for different types of distribution requirements. This assessment is in addition to that already included in local plan making and requires a more joined up approach with NH. It is unclear how this need would be assessed by NH and there is concern that this could impact the release of brown-field land for development.

The circular also highlights the need for a robust evidence base to support local plan making, which is currently already undertaken by both Planning and Highway authorities in supporting Local Plans. It is not clear if this will require specific additional assessments and evidence such as carbon.

It should be noted that DfT require the use of DMRB in highway design for links to the SRN and this could impact placemaking for sections of the SRN and MRN that go through towns and villages where local authorities often encourage the use of more place making approach in Manual for Streets (Para 26). DMRB also precedes updated active travel guidance.

One of the biggest changes is the requirement of roadside facilities and paragraphs 80-83 that set out the requirements for freight facilities. The Circular sets out that NH will work with local planning authorities in areas of identified need (Para 82) to ensure that local plan allocations address the shortage of HGV parking on or near to the SRN. The assessment of need forms part of National Highways duties but local planning authorities would be required to plan for this unmet need as part of their Local Plan process. From discussion with planning authorities, it is felt that this should be a National Highways requirement to determine and provide for the need serving the SRN.

The circular also suggests that existing truck stops (including closed facilities) on or near to the SRN must be retained for their continued and future use unless it can be clearly demonstrated that a need no longer exists. It also sets out the requirements for types of facilities to be provided at truck stops and these include toilets, EV charging etc. These can be managed through the planning system. Most authorities note that inappropriate laybys are often used by HGVs and these are not considered truck stops or appropriate truck stops. It is suggested that charges at facilities on the SRN contribute to use of inappropriate locations.

It is suggested that the maximum distance between signed motorway service areas should be 28 miles or equivalent of 30 minutes driving time, however, it suggests that planning authorities do not need to consider the merits of spacing in planning applications. It is unclear how 30 minutes would be determined, if need would be identified by NH or if this need has to be identified and accommodated in Local Plans or if distances are a means for NH to raise an objection to local planning decisions.

In conclusion, while EEH supports the changes, especially the focus on place based approach to development and the promotion of more sustainable modes of travel that aligns with the EEH transport strategy, there remain some areas of clarification and further consideration. I would welcome a meeting to discuss these issues in more detail.

Yours sincerely



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