

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 6

6.1 Environmental Statement

Chapter 1: Introduction

Planning Act 2008

Regulation 5(2)(a)

Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009

26 February 2021

## Infrastructure Planning

### Planning Act 2008

### The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

## A428 Black Cat to Caxton Gibbet improvements Development Consent Order 202[ ]

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### Chapter 1: Introduction

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# 1 Introduction

## 1.1 Purpose of the report

- 1.1.1 As the Government-owned company responsible for the operation, maintenance and improvement of England's motorways and major A-roads, Highways England is proposing the construction of a new 16km (10 mile) dual 2-lane carriageway from the existing Black Cat roundabout to the existing Caxton Gibbet roundabout, to be known as the A421 (hereafter referred to as the 'new dual carriageway') and in addition approximately 3km (1.8 miles) of tie-in works.
- 1.1.2 The proposals are referred to as the A428 Black Cat to Caxton Gibbet improvements scheme (the Scheme).
- 1.1.3 Highways England has made an application for a Development Consent Order (DCO) to the Planning Inspectorate (the Inspectorate) seeking consent for the Scheme from the Secretary of State for Transport (Secretary of State).
- 1.1.4 This report is an Environmental Statement. It reports the findings of an Environmental Impact Assessment (EIA) undertaken to identify the likely significant effects of the Scheme on the environment, and forms one of a series of documents that comprise the DCO application.
- 1.1.5 The Inspectorate will examine the DCO application and will make a recommendation to the Secretary of State on whether development consent for the Scheme should be granted or refused.

## 1.2 Overview of the Scheme

- 1.2.1 The A428 connects communities between St Neots and Cambourne and links the East of England to important regional, national and international hubs such as the Felixstowe and Harwich ports. The route also connects Bedford, Milton Keynes and the M1 motorway to Cambridge and the M11 motorway and is used by both local and long distance traffic.
- 1.2.2 Between St Neots and Cambridge, the A428 is the only stretch of single carriageway along this route. Motorists are subject to regular delays and congestion which affect journey times, and there are also a high number of incidents along the route.
- 1.2.3 There is potential for significant growth in the local area, with new housing and transport developments likely to come forward in the near future which will exacerbate the current problems on this section of the road network.
- 1.2.4 The Department for Transport outlined in its *Road Investment Strategy: for the 2015/16 – 2019/2020 Road Period* (Ref 1-1) (RIS1) the case for "improvement of the A428 near St Neots, linking the A421 to Milton Keynes with the existing dual carriageway section of the A428 to Cambridge... The scheme is expected to include significant improvements to the Black Cat roundabout, where the A1 currently meets the A421".

- 1.2.5 Since the announcement, Highways England has developed, consulted upon and assessed a number of options for the Scheme (see **Chapter 3, Assessment of Alternatives** of the Environmental Statement [TR010044/APP/6.1]), the purpose being to develop a solution that, on balance, best addresses the problems and issues associated with the A428 between the existing Black Cat and Caxton Gibbet roundabouts.
- 1.2.6 Following an evaluation of these options, Highways England announced its preferred route for the Scheme to the public on 18 February 2019 (Ref 1-2).
- 1.2.7 Statutory consultation on the preferred route was undertaken between 3 June 2019 and 28 July 2019.
- 1.2.8 In March 2020, the Department for Transport published its *Road Investment Strategy 2: 2020 – 2025* (Ref 1-3) (RIS2) which made a commitment to fund the Scheme within Road Period 2 (covering the financial years 2020/21 to 2024/25).
- 1.2.9 Non-statutory supplementary consultation on changes proposed to the design of the Scheme was undertaken between 24 June 2020 and 28 July 2020.
- 1.2.10 Further non-statutory supplementary consultation was undertaken between 11 November 2020 and 18 December 2020 as a result of the potential change in status and extent of a high pressure gas pipeline operated by Cadent Gas Limited, which would be diverted as part of the Scheme.
- 1.2.11 Feedback from the consultation process has been used to inform the development of the Scheme design on which the EIA has been undertaken. Details regarding the consultation process and its outcomes are reported in the Consultation Report [TR010044/APP/5.1].
- 1.2.12 The location and extents of the Scheme are illustrated on **Figure 1.1** in the Environmental Statement [TR010044/APP/6.2] and are described in detail in **Chapter 2, The Scheme** of the Environmental Statement [TR010044/APP/6.1].
- 1.2.13 The Scheme includes the following components:
- A new three-level grade separated junction at Black Cat roundabout, with the A1 at the lower level, the new dual carriageway on the upper level and a roundabout between the two at approximately existing ground level. In addition to slip roads a new free flowing link between the A421 eastbound carriageway and the A1 northbound carriageway will also be provided.
  - A new grade separated all movements junction will be constructed to the east of the existing Cambridge Road roundabout to provide access to the new dual carriageway and maintain access to the existing A428.
  - At the Caxton Gibbet roundabout, a new grade separated all movements junction will be constructed, incorporating the existing roundabout on the south side of the new dual carriageway and a new roundabout on the north side. The new dual carriageway will then tie-in to the existing A428 dual carriageway to the east of the new Caxton Gibbet junction.

- d. In the vicinity of the new Black Cat junction, direct access onto the A1 from some local side roads and private premises will be closed for safety reasons. A new local road will provide an alternative route. The existing Roxton Road bridge will be demolished and replaced with a new structure to the west to accommodate the realigned A421.
- e. New crossings will be constructed to enable the new dual carriageway to cross the River Great Ouse, East Coast Main Line railway, Barford Road, the B1046/Potton Road, Toseland Road and the existing A428 at Eltisley.
- f. The existing A428 between St Neots and Caxton Gibbet will be de-trunked and retained for local traffic and public transport with maintenance responsibility transferred to the local highway authorities.
- g. An alternative access will be provided to side roads at Chawston, Wyboston and Eltisley.
- h. There will be safer routes for walkers, cyclists, and horse riders.

1.2.14 In addition to the above, the Scheme also includes the diversion of various utilities, creation of flood compensation, attenuation basins and various access tracks.

1.2.15 Subject to the DCO for the Scheme being made by the Secretary of State, construction is expected to start in 2022. The new dual carriageway is then expected to be open to use by traffic in 2026.

## 1.3 Legislative and policy framework

### Planning Act 2008

1.3.1 The *Planning Act 2008* (Ref 1-4) (the Act) sets out the thresholds above which certain types of major development are considered to be a Nationally Significant Infrastructure Project (NSIP).

1.3.2 The Scheme is classed as a NSIP under s22 of the Act (Ref 1-4) as it constitutes highway-related development which, when constructed:

- a. The highway will be wholly within England.
- b. The Secretary of State will be the highway authority for the highway.
- c. The area of development will be greater than the relevant limit set out in subsection (4)<sup>1</sup>.

1.3.3 The Scheme includes the diversion of a high pressure gas pipeline operated by Cadent Gas Limited which runs parallel to the East Coast Main Line east of the River Great Ouse in Tempsford, Central Bedfordshire (the Diversion). To the extent that the Diversion would give rise to likely significant effects, it would satisfy the criteria to be considered an NSIP under s20 of the Act (Ref 1-4) and treated as an NSIP in its own right.

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<sup>1</sup> The relevant limit being 12.5 hectares, as the speed limit for any class of vehicle is expected to be 50 miles per hour or greater.

- 1.3.4 Under the Act (Ref 1-4), a developer intending to construct a NSIP must obtain development consent from the Secretary of State.
- 1.3.5 Highways England has submitted its application for development consent for the Scheme under s37 of the Act (Ref 1-4) to the Inspectorate, the agency responsible for receiving and examining such applications.
- 1.3.6 The requirements of s37 of the Act (Ref 1-4) are given effect by the *Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009* (the APFP Regulations) (Ref 1-5) and the *Infrastructure Planning (Environmental Impact Assessment) Regulations 2017* (the EIA Regulations) (Ref 1-6).
- 1.3.7 Following examination of the application, the Secretary of State will decide on whether to grant the DCO for the Scheme based on the recommendations of the Inspectorate. The DCO, if made, will contain the consent and other authorisations required by Highways England to construct, operate and maintain the Scheme.

**The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009**

- 1.3.8 The APFP Regulations (Ref 1-5) and the EIA Regulations (Ref 1-6) set out the documentation required to accompany a DCO application, and stipulate that an Environmental Statement is to be provided where an NSIP is EIA development.

**The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017**

- 1.3.9 The EIA Regulations (Ref 1-6) transpose the requirements of *Directive 2011/92/EU*<sup>2</sup> (Ref 1-7) and subsequent amendments made by *Directive 2014/52/EU* (Ref 1-8).
- 1.3.10 The EIA Regulations (Ref 1-6) apply to certain types of development that are likely to have significant environmental effects.
- 1.3.11 The Scheme qualifies for mandatory EIA as it comprises construction of a new road of four lanes and of 10 kilometres (6.2 miles) or more in a continuous length, as listed in paragraph 7(3) of Schedule 1 of the EIA Regulations (Ref 1-6).
- 1.3.12 Under the provisions of the EIA Regulations (Ref 1-6), Highways England requested a scoping opinion from the Secretary of State as to the form and nature of the environmental assessments to be undertaken within the EIA, the details of which are summarised in **Chapter 4, Environmental Assessment Methodology** of the Environmental Statement [TR010044/APP/6.1]. The request was submitted to the Inspectorate on 2 April 2019 and was accompanied by a scoping report (Ref 1-9) which set out Highways England's proposed approach to the EIA and the scope of the individual assessments it planned to undertake.

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<sup>2</sup> As of exit day (11pm on 31 January 2020) the UK is no longer an EU Member State. However, the UK has entered an implementation period during which it continues to be treated as an EU Member State for many purposes, though it will not participate in the political institutions and governance structures of the EU (except to the extent agreed). The UK will therefore continue to adhere to its obligations under EU law (including treaties, legislation, principles and international agreements), and submit to the continuing jurisdiction of the Court of Justice of the EU.



- 1.3.13 The Inspectorate issued Highways England its scoping opinion [TR010044/APP/6.5] on behalf of the Secretary of State on 13 May 2019.
- 1.3.14 The EIA has been carried out in accordance with the requirements of the scoping opinion [TR010044/APP/6.5], the outcomes of which are reported within this Environmental Statement.

### **National Policy Statements**

- 1.3.15 National Policy Statements are documents that underpin the planning regime set out within the Act (Ref 1-4) and which set out the need for certain types of infrastructure and the impacts that should be assessed by project promoters and decision-makers. They also form the primary basis for making decisions on the development consent of NSIPs in England.

#### *National Policy Statement for National Networks*

- 1.3.16 The *National Policy Statement for National Networks* (NPSNN) (Ref 1-10) sets the policy against which the Secretary of State makes decisions on applications for DCOs on the road and rail networks and strategic rail freight interchanges. It also imposes requirements on matters such as good scheme design and the treatment of environmental impacts and provides planning guidance.
- 1.3.17 As the Scheme is a national road network NSIP, the general principles of assessment and the assessment methodologies contained within Sections 4 and 5 respectively of the NPSNN (Ref 1-10) have been referenced and adopted as part of the EIA, where appropriate, to ensure compliance with this policy document.

#### *Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)*

- 1.3.18 The relevant National Policy Statements for the gas pipeline diversion element of the Scheme are the:
- a. *Overarching National Policy Statement for Energy (EN-1)* (Ref 1-11).
  - b. *National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)* (Ref 1-12).
- 1.3.19 In relation to the diversion, the general principles of assessment and the assessment methodologies contained within Sections 4 and 5 respectively of the *EN-1* (Ref 1-11), and the assessment and technology-specific information within Part 2 of *EN-4* (Ref 1-12), have been referenced and adopted as part of the EIA, where appropriate, to ensure compliance with both policy documents.

### **National Planning Policy Framework**

- 1.3.20 The *National Planning Policy Framework* (NPPF) (Ref 1-13) sets out the Government's planning policies for England and the requirements for the planning system.
- 1.3.21 Although NSIPs are determined in accordance with the decision-making framework set out in the Act (Ref 1-4) and relevant National Policy Statements, the NPPF (Ref 1-13) can be an important and relevant consideration in decisions relating to NSIPs.



- 1.3.22 Where relevant, the EIA has given regard to the individual policies contained within the NPPF (Ref 1-13).

**Strategic business plan 2020 – 2025**

- 1.3.23 Highways England's *Strategic business plan 2020 – 2025* (Ref 1-14) sets out its approach to building on its work undertaken in its first Road Period, responding to and aligning with RIS2 (Ref 1-3).
- 1.3.24 The plan (Ref 1-14) identifies environmental commitments made by Highways England:
- a. Improving the health and wellbeing of people living near its roads.
  - b. Supporting government's ambition to achieve net zero UK carbon emissions by 2050.
  - c. Maximising opportunities for sustainability.
  - d. Improving the natural, built and historic environment.
  - e. Creating a network resilient to a changing climate.
- 1.3.25 Key performance indicators within the plan (Ref 1-14) include:
- a. Achieving no net loss of biodiversity across all Highways England activities by the end of Road Period 2.
  - b. Reducing carbon emissions resulting from Highways England's electricity consumption, fuel use and other day-to-day operational activities during Road Period 2.
  - c. Bringing agreed sections of the strategic road network into compliance with legal NO<sub>2</sub> limit values as soon as possible.
  - d. Delivering road noise mitigation for 7,500 households in 'noise important areas'.
- 1.3.26 Highways England has sought to place environment at the heart of the design of the Scheme and has taken account of these commitments and key performance indicators.

**Delivery plan 2020 – 2025**

- 1.3.27 Highways England's *Delivery plan 2020 – 2025* (Ref 1-15) supports the *Strategic business plan 2020 – 2025* (Ref 1-14) and details how it will invest in the safety and smooth running of the strategic road network over Road Period 2.
- 1.3.28 The plan (Ref 1-15) details how Highways England will minimise the environmental impact and improve the performance of the strategic road network and make journeys more sustainable, and references Highways England's publication *The road to good design* (Ref 1-16) which contains ten principles for good road design. These principles have been embedded into the design of the Scheme where possible.
- 1.3.29 The plan (Ref 1-15) confirms that Highways England will progress the design and statutory planning approval for the Scheme in 2020 – 2021.

- 1.3.30 Highways England has accordingly submitted a DCO application to the Inspectorate for the Scheme.

**Other Highways England strategies and plans**

- 1.3.31 The following Highways England strategies and plans have been considered as part of the design-development and EIA processes, a number of which are due to expire in 2021 or have been identified for updating in the near future.

*Environment Strategy: Our approach*

- 1.3.32 Highways England's *Environment Strategy: Our approach* (Ref 1-17) sets the guiding vision for Highways England's environmental actions and activities over the five year period outlined in RIS1 (Ref 1-1).

- 1.3.33 The document communicates the approach to securing environment improvement, founded on the vision of "A strategic road network working more harmoniously with its surroundings to deliver an improved environment".

- 1.3.34 Through its strategy (Ref 1-17), Highways England has identified a series of strategic levers and plans which place environment at the heart of design. These have been considered as part of the design-development and environmental assessment of the Scheme.

*Sustainable development strategy: Our approach*

- 1.3.35 Highways England's *Sustainable development strategy: Our approach* (Ref 1-18) communicates Highways England's approach and priorities for sustainable development to its key stakeholders.

- 1.3.36 By "encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations", Highways England seeks to protect manage and enhance the human and natural environment whilst ensuring value for money and efficiency is achieved in the development of schemes identified in RIS1 (Ref 1-1).

- 1.3.37 The design-development of the Scheme has given regard to the principles contained in the strategy (Ref 1-18).

*Our strategy to improve air quality*

- 1.3.38 Highways England's *Our strategy to improve air quality* (Ref 1-19) explains Highways England's strategy to improving air quality on the strategic road network, in order to deliver a cleaner network and improve the health of its neighbours and customers.

- 1.3.39 The document identifies the importance of clean air and the need to explore new and innovative ways to address the impact that vehicle emissions have on air quality and human health.

- 1.3.40 Tackling poor air quality has been a key consideration in the design-development and environmental assessment of the Scheme.

*Our plan to protect and increase biodiversity*

- 1.3.41 Highways England's *Our plan to protect and increase biodiversity* (Ref 1-20) forms a key component of the *Environment Strategy: Our approach* (Ref 1-17) and seeks to ensure that road schemes are developed and managed in a way that positively supports biodiversity.
- 1.3.42 The document acknowledges that highway verges and associated land have a key role in improving the quality of wildlife areas and connecting fragmented habitats.
- 1.3.43 Through the EIA process, potential effects on ecological habitats and species have been considered and measures have been included within the Scheme design to avoid, mitigate and (where practicable) enhance biodiversity. These measures have been developed to further the ambitions presented within RIS1 (Ref 1-1) relating to improving the environmental outcomes of Highways England's activities on the strategic road network and delivering a net gain in biodiversity by 2040.

**Highways England: Licence**

- 1.3.44 The *Highways England: Licence* (Ref 1-21) issues the Secretary of State's statutory directions to Highways England as the highway authority responsible for the strategic road network. The document sets out important objectives and conditions around how the company must exercise its role and statutory functions.
- 1.3.45 Guidance contained in the document relating to environmental protection, enhancement and sustainable design has been considered as part of the design-development and environmental assessment of the Scheme.

**1.4 Competent expert evidence**

- 1.4.1 *Directive 2014/52/EU* (Ref 1-8) requires that experts involved in the preparation of Environmental Statements for projects subject to EIA are appropriately qualified and experienced.
- 1.4.2 This Environmental Statement, and the EIA carried out to identify the likely significant environmental effects of the Scheme, has been undertaken by AECOM on behalf of Highways England.
- 1.4.3 AECOM is one of the founding members of the EIA Quality Mark<sup>3</sup>, a voluntary scheme operated by the Institute of Environmental Management and Assessment (IEMA) through which AECOM's EIA activity is independently reviewed to ensure it delivers excellence in EIA practice.
- 1.4.4 This Environmental Statement has been prepared by competent experts within AECOM, the content of which has been subjected to detailed checking, technical review and verification in accordance with its quality assurance procedures.

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<sup>3</sup> Further information regarding the EIA Quality Mark is available at: [www.iema.net/eia-quality-mark](http://www.iema.net/eia-quality-mark).

- 1.4.5 Information summarising the competency of the environmental specialists responsible for the technical assessments reported within this Environmental Statement is presented within the introductory sections of **Chapters 5 – 15** of the Environmental Statement [TR010044/APP/6.1].
- 1.4.6 The overall EIA lead and competent expert responsible for this Environmental Statement is Jamie Alan Gleave, an Associate Director within AECOM.
- 1.4.7 Jamie has over 20 years of experience in the co-ordination, management, direction and technical review of EIAs and Environmental Statements. He holds the following qualifications:
- a. A Masters degree in Landscape Planning and Management (MLPM(Hons)).
  - b. Chartered Environmentalist (CEnv).
  - c. Chartered Scientist (CSci).
  - d. Full Member of IEMA (MIEMA).
  - e. Full Member of the Institution of Environmental Sciences (MIEnvSc).
- 1.4.8 Jamie frequently leads on complex linear development projects and possesses wide ranging experience in the transportation sector, having been involved in the environmental assessment and delivery of over 20 road projects in England, Scotland, Wales and Northern Ireland. He has undertaken planning and environmental assessment roles on a number of NSIPs within England and Wales, including:
- a. The M42 Junction 6 Improvement project.
  - b. The Wylfa Newydd Nuclear Power Station project.
  - c. The Teesside Generating Station and Harbour Facilities project.
  - d. The East Anglia ONE Offshore Wind Farm project.
  - e. The Rampion Offshore Wind Farm project.
- 1.4.9 Jamie has given oral evidence at DCO hearings and planning committee meetings and has prepared written evidence for public inquiries. He has also delivered environmental training and authored several papers on EIA-related subjects.
- 1.4.10 Jamie is also responsible for managing and maintaining AECOM's EIA Quality Mark accreditation with IEMA.

## 1.5 References

- Ref 1-1 Road Investment Strategy: for the 2015/16 – 2020/21 Road Period. Department for Transport (2015).  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/408514/ris-for-2015-16-road-period-web-version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf)
- Ref 1-2 A428 Black Cat to Caxton Gibbet improvements: Preferred route announcement. Highways England (2019). <https://highwaysengland.citizenspace.com/he/a428-black-cat-to-caxton-gibbet/results/a428blackcattocaxtongibbetwebpra.pdf>
- Ref 1-3 Road Investment Strategy 2: 2020–2025. Department for Transport (2020).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/872252/road-investment-strategy-2-2020-2025.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872252/road-investment-strategy-2-2020-2025.pdf)
- Ref 1-4 Planning Act 2008. HMSO (2008).  
<http://www.legislation.gov.uk/ukpga/2008/29/contents>
- Ref 1-5 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. HMSO (2009).  
<https://www.legislation.gov.uk/uksi/2009/2264/contents/made>
- Ref 1-6 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. HMSO (2017). <http://www.legislation.gov.uk/uksi/2017/572/contents/made>
- Ref 1-7 Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (codification). Official Journal of the European Union (2011).  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32011L0092>
- Ref 1-8 Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment. Official Journal of the European Union (2014).  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014L0052>
- Ref 1-9 A428 Black Cat to Caxton Gibbet: Environmental Scoping Report. Highways England (2019).  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010044/TR010044-000006-BCCG%20-%20Scoping%20Report.pdf>
- Ref 1-10 National Policy Statement for National Networks. HMSO (2014).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/387222/npsnn-print.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387222/npsnn-print.pdf)



- Ref 1-11 Overarching National Policy Statement for Energy (EN-1). Department of Energy & Climate Change (2011).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47854/1938-overarching-nps-for-energy-en1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf)
- Ref 1-12 National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4). Department of Energy & Climate Change (2011).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47857/1941-nps-gas-supply-oil-en4.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47857/1941-nps-gas-supply-oil-en4.pdf)
- Ref 1-13 National Planning Policy Framework. Department for Communities and Local Government (2019).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)
- Ref 1-14 Strategic business plan 2020 – 2025. Highways England (2020).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912576/strategic-business-plan-2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912576/strategic-business-plan-2020-25.pdf)
- Ref 1-15 Delivery plan 2020 – 2025. Highways England (2020).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/910866/5-year\\_Delivery\\_Plan\\_2020-2025\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/910866/5-year_Delivery_Plan_2020-2025_FINAL.pdf)
- Ref 1-16 The road to good design. Highways England (2018).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/672822/Good\\_road\\_design\\_Jan\\_18.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672822/Good_road_design_Jan_18.pdf)
- Ref 1-17 Environment Strategy: Our approach. Highways England (2017).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/605063/Environment\\_Strategy\\_21\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/605063/Environment_Strategy_21_.pdf)
- Ref 1-18 Sustainable development strategy: Our approach. Highways England (2017).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/605079/Sustainable\\_Development\\_Strategy\\_6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/605079/Sustainable_Development_Strategy_6.pdf)
- Ref 1-19 Our strategy to improve air quality. Highways England (2017).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/634933/N160081\\_Air\\_Quality\\_Strategy\\_Final\\_V18.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/634933/N160081_Air_Quality_Strategy_Final_V18.pdf)
- Ref 1-20 Our plan to protect and increase biodiversity. Highways England (2015).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/441300/N150146\\_-\\_Highways\\_England\\_Biodiversity\\_Plan3lo.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441300/N150146_-_Highways_England_Biodiversity_Plan3lo.pdf)
- Ref 1-21 Highways England: Licence – Secretary of State for Transport statutory directions and guidance to the strategic highways company. Department for Transport (2015).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/431389/strategic-highways-licence.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431389/strategic-highways-licence.pdf)