

### A46 Newark Bypass

TR010065/APP/6.1

# 6.1 Environmental Statement Chapter 4 Environmental Assessment Methodology

APFP Regulation 5(2)(a)

Planning Act 2008

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

Volume 6

April 2024

# Infrastructure Planning Planning Act 2008

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

# A46 Newark Bypass Development Consent Order 202[x]

## ENVIRONMENTAL STATEMENT CHAPTER 4 ENVIRONMENTAL ASSESSMENT METHODOLOGY

5(2)(a)
PP/6.1
Bypass Project Team, National

Version	Date	Status of Version
Rev 1	April 2024	DCO Application



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### **4 Environmental Assessment Methodology**

#### 4.1 Environmental Scoping

- 4.1.1 An Environmental Scoping Report¹ was produced for the Scheme and submitted to the Planning Inspectorate (the Inspectorate) in September 2022. The Environmental Scoping Report was prepared in accordance with Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations)², LA103 (Scoping projects for environmental assessment) of the Design Manual for Roads and Bridges (DMRB)³ and the Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment⁴ for all environmental factors (topics) set out in the EIA Regulations. The DMRB is the relevant standard to use for the design, assessment and operation of motorway and all-purpose trunk roads in the United Kingdom. The DMRB standards have therefore been used informed the environmental assessments contained within this ES.
- 4.1.2 The purpose of the environmental scoping process is to determine which environmental factors (topics) should be included in the Environmental Statement (ES), the level of detail to which they should be assessed, and to set out the proposed methodology to be included within the ES.
- 4.1.3 The assessment for each of these factors was covered in one or more environmental assessment chapters of the Environmental Scoping Report. Table 4-1 shows the environmental factors and their respective DMRB topics.

<sup>&</sup>lt;sup>1</sup> National Highways (September 2022) A46 Newark Bypass Environmental Scoping Report [online] available at: TR010065-000002-A46N - Scoping Report.pdf (planninginspectorate.gov.uk) (last accessed December 2023).

<sup>&</sup>lt;sup>2</sup> Statutory Instrument (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, No. 527.

<sup>&</sup>lt;sup>3</sup> Standard for Highways (2020) Design Manual for Roads and Bridges, LA103 'Scoping projects for environmental assessment'.

<sup>&</sup>lt;sup>4</sup> The Planning Inspectorate (2020) Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements [online] available at: <u>Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements | National Infrastructure Planning (planninginspectorate.gov.uk) (last accessed December 2023).</u>



Table 4-1: Environmental factors and respective DMRB environmental topics

Factors contained within Regulation	DMRB Topic
5 (2) of the EIA Regulations	
a) Population and human health	Air quality
	Noise and vibration
	Population and human health
	Road drainage and the water environment
b) Biodiversity	Biodiversity
c) Land, soil, water, air and climate	Air quality
	Geology and soils
	Road drainage and the water environment
	Climate
d) Material assets, cultural heritage,	Cultural heritage
and the landscape	Landscape and visual effects
	Material assets and waste
e) The interaction between the factors	Combined and cumulative effects
referred to in sub-paragraphs (a) to	
(d).	

- 4.1.4 The Environmental Scoping Report was submitted to the Planning Inspectorate in September 2022 in order to request a Scoping Opinion. The Environmental Scoping Report was issued to consultation bodies by the Inspectorate and the responses from these consultation bodies informed the Scoping Opinion received from the Planning Inspectorate for this Scheme (TR010065/APP/6.10) on 21 October 2022. A list of those consultees can be found within the Scoping Opinion received for this Scheme (TR010065/APP/6.10).
- 4.1.5 The ES has been undertaken in compliance with the Inspectorate's Scoping Opinion received for this Scheme (TR010065/APP/6.10), further details of which are presented in each of the relevant sections of Chapters 5 to 15 of this ES. A description of how each of the Scoping Opinion comments have been taken into account within this ES is also contained within Appendix 4.1 (Scoping Opinion Schedule of Comments and Responses) of the ES Appendices (TR010065/APP/6.3).

#### Major accidents and disasters

- 4.1.6 Regulation 5 (4) of the EIA Regulations require an assessment of 'the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned'.
- 4.1.7 The assessment of the vulnerability of the Scheme to risks of major accidents and/or disasters is provided within Appendix 4.2 (Assessment of Major Accidents and Natural Disasters) of the ES Appendices (TR010065/APP/6.3).



4.1.8 Several risks of major accidents and natural disasters have been identified as potentially occurring during either construction or operation of the Scheme. However, the assessment concluded that the risks would not result in major accidents and natural disasters with risk mitigation measures in place. With mitigation measures detailed in Table 1-2 of Appendix 4.2 (Assessment of Major Accidents and Natural Disasters) of the ES Appendices (TR010065/APP/6.3), these are not anticipated to result in significant effects for any environmental factor, and the Scheme would not increase the chances of such events occurring.

#### Heat and radiation

4.1.9 In the Scoping Opinion **(TR010065/APP/6.10)** the Inspectorate agreed with the conclusion of the Environmental Scoping Report that effects from heat and radiation did not require consideration in this ES.

#### Transboundary effects

- 4.1.10 In the Scoping Opinion (TR010065/APP/6.10) the Inspectorate considered that the Scheme is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate identified and considered the Scheme's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.
- 4.1.11 The Inspectorate considered that the likelihood of transboundary effects resulting from the Scheme is so low that it does not warrant the issue of a detailed transboundary screening. Transboundary effects have therefore been scoped out of this ES.

#### 4.2 Surveys and predictive techniques and methods

- 4.1.12 The study area for each topic is described in detail within the relevant sections of Chapters 5 to 15 of this ES. The data gathering work undertaken for this ES is also presented in each of the relevant sections of Chapters 5 to 15 of this ES, but generally comprises the following elements:
  - Consultation with third-party organisations, such as Newark & Sherwood District Council, to obtain information
  - Desk-based studies
  - Field surveys



#### **General assessment assumptions and limitations**

#### General assumptions

- 4.1.13 There are a number of topic-specific assumptions and limitations, and these are detailed in the relevant sections of Chapters 5 to 15 of this ES. The principal assumptions made and limitations encountered in this ES are as follows:
  - This ES report has assumed that the extents of the Order Limits, as shown on Figure 1.1 (Scheme Order Limits) of the ES Figures (TR010065/APP/6.2), represent the maximum area within which physical disturbance may occur to environmental resources and receptors.
  - The assessment has been based on the construction methodologies described in Section 2.7 of Chapter 2 (The Scheme) of this ES. Where uncertainties in construction practices have been highlighted in Chapter 2 The Scheme, the worst-case scenario has been assessed within Chapters 5 to 15 of this ES.
  - The assessments have been undertaken of the Scheme design as described in Section 2.5 of Chapter 2 (The Scheme) of this ES and illustrated in the General Arrangement Plans (TR010065/APP/2.5).
  - The key milestones for the Scheme include:
    - Start of main construction works August 2025 (construction duration has been assumed to be approximately 3 years in length)
    - Opening year 2028
    - Design year 2043

#### General limitations

- 4.1.14 Ongoing environmental assessment work has made use of data extracted from the updated traffic model that has also been used to inform the Case for the Scheme (TR010065/APP/7.1), submitted as part of the Development Consent Order (DCO) application. The updated model is based on the National Highways second generation Midland Regional Transport Model (MRTM2), which has a March 2019 base. A March 2019 base has been used as this represents the most up to date information available on travel patterns and traffic volumes pre-Covid. Travel behaviour post-Covid has not yet stabilised, making more recent data collection difficult, and as such would not provide a reliable base for traffic forecasts. The impacts of Covid on travel behaviour will be incorporated into the forecasting process. Quantitative air quality and noise assessments have been undertaken using the revised traffic flows to inform the ES:
  - The model comprises a SATURN highway assignment model and a DIADEM variable demand model.
  - Future year forecasts have been developed for 2028, 2043 and 2061.



- The National Trip End Model (NTEM) 8 and National Road Traffic Projections 23 (NRTP23) provide the basis of the future year forecasts.
- The Uncertainty Log covering future network and developments has been updated to reflect the current situation. This will provide development trip information for the future year traffic models.
- 4.1.15 Further details of the traffic model assumptions and limitations are detailed within the Transport Assessment (TR010065/APP/7.4).

#### Significance criteria

- 4.1.16 The output of environmental assessment is to report the likely significance of effects using established significance criteria, as presented within the DMRB LA 104 Environmental Assessment and Monitoring<sup>5</sup>. This requires an assessment of the receptor or resource's environmental value (or sensitivity) and the magnitude of the Scheme's predicted impacts (change).
- 4.1.17 The DMRB states that the approach to assigning significance of effect relies on reasoned argument, the professional judgement of competent experts and using effective consultation to ensure the advice and views of relevant stakeholders are taken into account. For some factors, predicted effects may be compared with quantitative thresholds and scales in determining significance. The majority of the environmental assessment chapters contained within Chapters 5 to 15 of this ES describe the specific thresholds / criteria used to determine value / magnitude / sensitivity and, in most cases, will align within the general methodology described within this section.
- 4.1.18 Assigning each effect to one of five significance categories enables different environmental effects to be compared at the same scale, to assist the decision-making process at whatever stage the project is at. These five significance categories are set out in Table 4--2 below.

Table 4-2: Descriptions of the significance of effect categories

Significance category	Typical descriptors of effects
Very large	Effects at this level are material in the decision-making process.
Large	Effects at this level are likely to be material in the decision-making
	process.
Moderate	Effects at this level can be considered to be material decision-making
	factors.
Slight	Effects at this level are not material in the decision-making process.

<sup>&</sup>lt;sup>5</sup> Design Manual for Roads and Bridges (2020) DMRB LA 104 – Environmental assessment and monitoring [online] available at: <u>LA 104 - Environmental assessment and monitoring - DMRB (standardsforhighways.co.uk)</u> (last accessed December 2023).



Significance category	Typical descriptors of effects	
Neutral	No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.	

Source: DMRB LA104 Environmental Assessment Methodology

- 4.1.19 An environmental value is identified for each of the receptors associated with each environmental factor scoped into the assessment, and a magnitude of change assigned. The magnitude of change and the value of the receptor (sensitivity) is combined to determine the likely significance of effect, as defined in Table 4-3.
- 4.1.20 The DMRB states that assessment of the significance of environmental effects shall cover the following factors:
  - The receptors/resources (natural and human) which would be affected and the pathways for such effects.
  - The geographic importance, sensitivity or value of receptors/resources.
  - The duration (long or short term); permanence (permanent or temporary) and changes in significance (increase or decrease).
  - Reversibility for example is the change reversible or irreversible, permanent or temporary.
  - Environmental and health standards (for example local air quality standards) being threatened.
  - Feasibility and mechanisms for delivering mitigating measures, for example is there evidence of the ability to legally deliver the environmental assumptions which are the basis for the assessment?
- 4.1.21 Significant effects typically comprise residual effects that are within the moderate, large or very large categories. It is important to note that significance categories can be positive (beneficial) as well as negative (adverse) effects.



Table 4-3: Assessing significance of potential effects

	Magnitude of potential impact (degree of change)					
Environmental value (sensitivity)		No Change	Negligible	Minor	Moderate	Major
	Very High	Neutral	Slight	Moderate or Large	Large or Very Large	Very Large
	High	Neutral	Slight	Slight or Moderate	Moderate or Large	Large or Very Large
	Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or Large
	Low	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight or Moderate
	Negligible	Neutral	Neutral	Neutral or Slight	Neutral or Slight	Slight

Source: DMRB LA104 Environmental Assessment Methodology

4.1.22 There are a number of environmental topics which, for various reasons, do not follow this methodology precisely for defining significance; these include air quality, biodiversity, noise and vibration, material assets and waste, human health and effects on climate.

Where this is the case, the criteria used to determine the significance of effects is detailed in these individual chapters.

#### 4.3 Mitigation measures and enhancements

#### Mitigation categories

- 4.1.23 In accordance with DMRB LA104 Environmental Assessment Methodology<sup>5</sup>, the environmental assessment and design for the Scheme has considered mitigation measures using a hierarchical system as follows:
  - 1) Avoidance and prevention: design and mitigation measures to prevent the effect (e.g. alternative design options or avoidance of environmentally sensitive sites).
  - 2) Reduction: where avoidance is not possible, then mitigation is used to lessen the magnitude or significance of effects.
  - 3) Remediation: where it is not possible to avoid or reduce a significant adverse effect, these are measures to offset the effect.
- 4.1.24 Priority has been given to the avoidance of effects at source, whether through the redesign of the Scheme or by regulating the timing or location of activities. Where it has not been possible to avoid significant negative effects, opportunities have been sought to reduce the effects, ideally to the point where they are no longer significant through mitigation measures.
- 4.1.25 This ES reports on the following categories of mitigation, in accordance with DMRB LA104:



- **Embedded mitigation:** these are project design principles adopted to avoid or prevent adverse environmental effects. Embedded mitigation measures that are included as part of this Scheme are detailed in Section 2.5 of Chapter 2 (The Scheme) of this ES.
- Essential mitigation: these are measures identified to reduce and if possible offset likely significant adverse environmental effects, in support of the reported significance of effects in the environmental assessment. Essential mitigation is reported within Chapters 5 to 15 of this ES for both construction and operation. Mitigation measures are also documented within Table 3-2 Register of Environmental Actions and Commitments (REAC) of the First Iteration Environmental Management Plan (EMP) (TR010065/APP/6.5) which also contains, an Outline Site Waste Management Plan (Appendix B.1), an Outline Materials Management Plan (Appendix B.2) and an Outline Soils Management Plan (Appendix B.3).
- 4.1.26 Where it has not been possible to reduce effects that are significant, opportunities for compensation have been explored, as detailed in Chapters 5 to 15 of this ES.
- 4.1.27 Each individual topic chapter of the ES (Chapters 5 to 15) provides a description of enhancement measures that have been considered as further opportunities for the Scheme. However, these enhancement measures have not been taken into account when determining significance of effects because they are over and above what is required to mitigate the adverse effects of the Scheme.

#### **Monitoring**

- 4.1.28 In accordance with DMRB LA104 Environmental Assessment Methodology<sup>5</sup>, where ES's conclude that there are significant adverse effects, projects must undertake proportionate monitoring of associated mitigation measures.
- 4.1.29 The purpose of monitoring is to:
  - ensure measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are delivered.
  - 2) build data on the effectiveness of design and mitigation measures thereby driving improvement in environmental performance for future projects.
  - 3) satisfy licence / permit requirements (where applicable).
  - 4) identify remedial action as a consequence of underperformance or failure of mitigation.
- 4.1.30 Each individual topic chapter of the ES (Chapters 5 to 15) provides details of any monitoring requirements, and these are also detailed within the First Iteration EMP (TR010065/APP/6.5).



#### Implementation and enforcement of mitigation and monitoring

- 4.1.31 Mitigation and monitoring measures will be secured by way of requirements in the draft Development Consent Order (DCO) (TR010065/APP/3.1) including that the Scheme is undertaken in accordance with the Second Iteration EMP (which will be developed from the First Iteration EMP (TR010065/APP/6.5)) and include detailed provision on mitigation of construction impacts), and specific mitigation obligations in key topic areas such as landscape, drainage and contaminated land.
- 4.1.32 Once the DCO has been made, National Highways will have a legal responsibility to comply with the DCO Requirements in the execution of the Scheme. Discharge of these requirements would be by consent from the Secretary of State, generally following consultation with the relevant planning or environmental authority.

#### **Duplication of assessment**

- 4.1.33 This ES has been prepared with reference to environmental assessments that have been carried out, or are ongoing, for nearby Schemes. In this way, duplication of assessment or survey effort can be avoided and consistency of approach, unless Scheme-specific factors determine otherwise, can be assured.
- 4.1.34 See Chapter 15 (Combined and Cumulative Effects) of this ES for further details.

#### 4.4 Consultation and engagement

4.1.35 This section describes specifically the environmental engagement that has been undertaken with statutory environmental bodies during the development of the Scheme design, in advance of the DCO application submission. Details of the wider Scheme engagement and consultation undertaken as part of the Scheme is contained within the Consultation Report (TR010065/APP/5.1), including details on consultation with statutory stakeholders identified in the Planning Act 2008, as well as non-statutory stakeholders.

#### Engagement with environmental bodies during options selection

- 4.1.36 National Highways has engaged with the following relevant environmental consultation bodies during the Scheme development stage:
  - Environment Agency
  - Natural England
  - Newark & Sherwood District Council
  - Nottinghamshire County Council



4.1.37 A summary of the meetings held during the optioneering stages of the Scheme is provided in Table 4-4 below. Environmental bodies were engaged through group meetings, telephone discussions and email channels.

Table 4-4: Summary of environmental body meetings during options selection stage

Date	Stakeholder	Discussion / topics raised		
Engagemer	Engagement with environmental stakeholders during optioneering stages			
11/01/2021	Environmental Stakeholder Briefing	Introduction to the Scheme, briefing regarding various route options, discussions around key environmental features, constraints, and opportunities and hear views and share local knowledge of stakeholders.		
13/01/2021	Nottinghamshire County Council	A meeting to inform the County Archaeologist about the heritage work being undertaken for the Scheme, and an opportunity for the County Archaeologist to raise any issues that should be addressed within the options assessments.		
16/03/2021	Newark & Sherwood District Council	A meeting to introduce the Scheme, discuss environmental features, constraints and opportunities, and share local knowledge. Potentially affected Tree Preservation Orders and conservation areas were discussed.		
29/04/2021	Environment Agency	A meeting to introduce the Scheme and discuss the climate change allowances, hydraulic model, flood compensation methodology, the flood reduction opportunities including legacy work and the Flood Risk Assessment.		
26/05/2021	Nottinghamshire County Council, Newark & Sherwood District Council	A meeting to introduce the Scheme and discuss climate change allowances, the hydraulic model and hydrology, flood compensation methodology and flood reduction opportunities including legacy work.		
09/06/2021	Environment Agency	Discussion regarding the Water Framework Directive (WFD) receptors, potential impacts and opportunities. To start engagement and dialogue around the WFD compliance assessment that will continue during the Scheme development.		

### Engagement with environmental bodies following the preferred route announcement

4.1.38 Following the announcement of the preferred route in February 2022, National Highways has engaged with the following statutory and non-statutory environmental bodies:



- Environment Agency
- Natural England
- Historic England
- Newark & Sherwood District Council
- Nottinghamshire County Council
- Nottinghamshire Wildlife Trust
- 4.1.39 A summary of the meetings held following the preferred route announcement is provided in Table 1-1 within Appendix 4.3 (Record of Environmental Engagement) of the ES Appendices (TR010065/APP/6.3). Environmental bodies were engaged through group meetings, telephone discussions and email channels.
- 4.1.40 Engagement with the following statutory bodies has continued through the format of an Environmental Technical Working Group (TWG):
  - Environment Agency
  - Historic England
  - Natural England
  - Newark & Sherwood District Council
  - Nottinghamshire County Council
- 4.1.41 The Environmental TWG was established to inform consultation bodies of the progress and timescales for the Scheme, and also to review and discuss specific Scheme issues, to consider appropriate design solutions and seek to agree statements of common ground (SoCGs) on environmental matters. The Environmental TWG also provided a format for technical review of the ES assessments such as EIA methodology and documents supporting the ES, and associated surveys, development, review and agreement of environmental design, mitigation requirements, and environmental opportunities and enhancements.
- 4.1.42 A list of the meetings held as part of the environmental TWGs is also provided in Table 1-2 within Appendix 4.3 (Record of Environmental Engagement) of the ES Appendices (TR010065/APP/6.3). Further relevant details of discussions are provided within Chapters 5 to 15 of this ES.

#### **Statutory Consultation**

4.1.43 National Highways held a statutory consultation between October and December 2022, which allowed a period for seeking views, comments and feedback on the Scheme. A series of public events and invitation-only meetings were held with key stakeholders, the local community and landowners. Members of the project team were available at events to discuss the Scheme with members of the public.



- 4.1.44 A Preliminary Environmental Information (PEI) report<sup>6</sup> and a non-technical summary (NTS)<sup>7</sup> of the PEI were published for the statutory consultation and were available for statutory consultees to comment on. In accordance with Regulation 12(2)(b) of the EIA Regulations, the PEI report presented information which "is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)".
- 4.1.45 The public events were advertised in accordance with the published Statement of Community Consultation (SoCC). The SoCC confirmed that the Scheme is an EIA development as defined by the EIA Regulations. A full copy of the SoCC was made available during the statutory consultation, in accordance with the Planning Act 2008.

#### **Targeted Consultations**

#### Non-statutory targeted consultation

- 4.1.46 Following the statutory consultation, National Highways carried out a non-statutory targeted consultation between March and April 2023 on updates made to six areas of the Scheme.
- 4.1.47 This consultation included the distribution of information to statutory bodies, persons with land interests and community stakeholders who National Highways considered would be impacted by, and interested in, the changes. No update was required to the PEI report<sup>9</sup> submitted for statutory consultation. Feedback and formal responses received during the non-statutory targeted consultation period are recorded and summarised in the Consultation Report (TR010065/APP/5.1) and Consultation Report Annexes (TR010065/APP/5.2).

#### Statutory targeted consultation

- 4.1.48 The Applicant carried out a targeted statutory consultation in the vicinity of Pelham Street in Newark-on-Trent, due to technical studies indicating the potential for noise impacts as a result of changes to traffic flows associated with the Scheme. The consultation took place between September and October 2023. The assessment for Pelham Street is presented within Chapter 11 (Noise and Vibration) of this ES.
- 4.1.49 The Applicant notified newly identified section 42(1)(d) Category 3 persons with an interest in land, by post. No update was required to the PEI report<sup>9</sup> submitted for statutory consultation. Feedback and formal responses received during the statutory targeted consultation period are recorded and summarised in the Consultation Report

<sup>&</sup>lt;sup>6</sup> National Highways (2022). Preliminary Environmental Information Report [online] available at: <u>Preliminary</u> Environmental Information Volume 1 Main Report.pdf (citizenspace.com) (last accessed December 2023).

<sup>&</sup>lt;sup>7</sup> National Highways (2022). Non-Technical Summary [online] available at: <u>Preliminary Environmental Information Volume 3 NonTechnical Summary.pdf</u> (citizenspace.com) (last accessed December 2023).



### (TR010065/APP/5.1) and Consultation Report Annexes (TR010065/APP/5.2).

#### 4.5 References

- <sup>1</sup> National Highways (September 2022) A46 Newark Bypass Environmental Scoping Report [online] available at: <u>TR010065-000002-A46N Scoping Report.pdf</u> (planninginspectorate.gov.uk) (last accessed December 2023).
- <sup>2</sup> Statutory Instrument (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, No. 527.
- <sup>3</sup> Standard for Highways (2020) Design Manual for Roads and Bridges, LA103 'Scoping projects for environmental assessment'.
- <sup>4</sup> The Planning Inspectorate (2020) Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements [online] available at: <u>Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements | National Infrastructure Planning (planninginspectorate.gov.uk) (last accessed December 2023).</u>
- <sup>5</sup> Design Manual for Roads and Bridges (2020) DMRB LA 104 Environmental assessment and monitoring [online] available at: <u>LA 104 Environmental assessment and monitoring DMRB (standardsforhighways.co.uk)</u> (last accessed December 2023).
- <sup>6</sup> National Highways (2022). Preliminary Environmental Information Report [online] available at: <u>Preliminary Environmental Information Volume 1 Main Report.pdf (citizenspace.com)</u> (last accessed December 2023).
- <sup>7</sup> National Highways (2022). Non-Technical Summary [online] available at: <u>Preliminary Environmental Information Volume 3 NonTechnical Summary.pdf</u> (citizenspace.com)