

Programme of Activities for Third Party Nationally Significant Infrastructure Projects

Guidance for National Highways Teams

29th September 2025

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1. Introduction

- 1.1 National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. In this context, we work closely with third party Promoters of schemes and have extensive experience of securing good outcomes for major external projects and the SRN.
- 1.2 National Highways' corporate imperatives are safety, customer and delivery. We are keen for scheme Promoters to engage with us at an early stage, to ensure that their plans will not impact adversely on the work we do or the customers and communities that we serve.
- 1.3 We have developed an indicative Programme of Activities and associated guidance for major third party Nationally Significant Infrastructure Projects (NSIPs), i.e., projects consented under the Planning Act 2008 through the Development Consent Order (DCO) process.
- 1.4 The Programme of Activities and its associated guidance should be read alongside other National Highways' guidance relating to major third party infrastructure projects, particularly Early Engagement Approach for Third Party NSIPs and Key Requirements for Third Party NSIPs ([Statement of Requirements](#) and [Guidance for Promoters](#)).
- 1.5 This guidance accompanies the Programme of Activities and provides further context and advice about its applicability. The Guidance covers:
 - Purpose of the Programme of Activities
 - Assumptions
 - Applying the Programme of Activities to a specific project

2. Purpose of the Programme

- 2.1 The Programme of Activities presents a recommended sequencing of key activities to help satisfy National Highways that the impacts of a major third party project on the SRN are acceptable.
- 2.2 The guidance focuses on Nationally Significant Infrastructure Projects (NSIPs), given our frequent engagement with such projects. The broad principles will be applicable to projects subject to different consenting routes (e.g., Hybrid Bills, Special Development Orders etc.) but there will be key differences in the processes which may affect the Programme of Activities. National Highways will work with Promoters in such instances, to ensure a Programme of Activities which is appropriate to the particular consenting route is developed.

- 2.3 The Programme of Activities covers the matters of relevance to National Highways, and the dependencies between them, in relation to a major third party project (e.g., airport expansions, cross-country rail projects etc.) and the associated deliverables, which must be in place in order for National highways to be able to support the project and any SRN works to be delivered.
- 2.4 The Programme of Activities is applicable from the earliest stages of the project lifecycle, to the Decision stage of the DCO process inclusively, but also includes matters relevant to construction and delivery assurance, which should be agreed or require awareness of prior to development approval being granted.
- 2.5 The precise starting point for our engagement with a major third party project will vary from project to project. At the latest it should be shortly after the project is registered on the PINS website and enters the DCO Pre-application stage, but in some cases we will be engaged earlier.
- 2.6 The indicative Programme presents a high-level, best practice sequencing of activities, with the aim for achieving key National Highways related milestones in advance of the DCO application submission. However, it is recognised that every project is unique and therefore the Programme of Activities does not negate the need for the Promoter to produce a project-specific Programme for engagement with National Highways, which will cover the key activities in more granular detail which should be agreed with National Highways and regularly updated, as the project progresses. This Programme of Activities is a key tool in helping develop the project-specific Programme of Activities and ensuring it is fit for purpose.
- 2.7 The Programme of Activities helps to de-risk the project for both parties and minimise costly abortive work for the Promoter, by working through key SRN related matters in an appropriate sequence, thereby maximising the likelihood of the Promoter and National Highways being able to agree key matters in relation to the SRN, in advance of the DCO examination.
- 2.8 A key part of helping to de-risk the project, is for National Highways' Key Requirements to be considered in the development of a project's highways options. This maximises the likelihood of SRN schemes being developed which are acceptable to National Highways. The Programme of Activities therefore presents a recommended sequencing of activities based around effective early engagement and information sharing between both parties, to help inform the development of highways options.
- 2.9 Third party projects of smaller scale or less complexity (e.g., projects requiring no modifications to the SRN and/or a significant distance from the SRN) will not require as much detail as a Programme of engagement, as set out in the Programme of Activities, but aspects of the Programme of Activities may still be applied to help form an appropriate programme for such projects.

3. Assumptions

- 3.1 The indicative Programme of Activities is based on the following assumptions:

- 3.1.1 The project is of a scale and/or complexity that a significant number of [National Highways' Key Requirements](#) are relevant and must be satisfied, with detailed, long-term engagement with National Highways required, to manage the impacts of the project on the SRN;
- 3.1.2 The project includes at least one scheme on the SRN i.e., an interface with the SRN as part of the overall project (e.g., a new connection; a crossing for a rail scheme etc.) and/or a scheme to mitigate the impacts of the project (e.g., a new junction; improvement works on an existing junction etc.)
- 3.1.3 The Promoter engages with National Highways in the early stages of the project lifecycle, prior to commencing traffic modelling work and allowing our Key Requirements to be considered in the options assessment, for the overall project design and associated SRN works;
- 3.1.4 Whilst the Programme of Activities does not include indicative timescales against individual activities (see section 4 below), a starting assumption is that the approximate timescales for the period from initial engagement commencing to the DCO application being submitted is approximately 3 years, but this will vary from project-to project and National Highways will work with Promoters to ensure the project-specific Programme of Activities reflects their overall project Programme:
- Initial engagement to commencement of base modelling: 3-6 months
 - Commencement of base modelling to Options Assessment: 1 year
 - Options Assessment to agreement of Preliminary Design: 1 year
 - Agreement of Preliminary Design to submission of DCO application: 6 months
- 3.1.5 Given the government's proposed amendments to the Planning and Infrastructure Bill concerning the removal of the statutory consultation requirement in the DCO Pre-application stage, the Programme of Activities does not map activities to Non-Statutory or Statutory Consultations. While these remain part of the DCO process, National Highways will work with Promoters to ensure the National Highways related Programme takes account of the Promoter's overall Programme in respect of these milestones.

4. Limitations

- 4.1 It is recognised that the path to development approval for major infrastructure projects, is rarely straightforward and therefore does not follow a perfect sequential process. It can often be the case that key matters which have been agreed must be revisited as a result of any number of factors, often outside of National Highways and the Promoter's control.
- 4.2 Whilst there is some acknowledgement of this in the indicative Programme of Activities, for example, the need to continually review and update the modelling after it has been initially agreed, which may have a knock-on effect to the SRN scheme design. The Programme of Activities cannot realistically capture all the scenarios in which previously agreed matters must be revisited.

- 4.3 In instances where previously agreed matters must be revisited, this will generally mean the dependent activities in the Programme of Activities will also need to be revisited, but this will be a matter for National Highways and the Promoter to review on the specific project.
- 4.4 The Programme of Activities does not include indicative timescales for individual activities. Given the unique circumstances and complexities of the major infrastructure projects this Programme of Activities applies to, any timescales for the activities would be so speculative that they would not add value. National Highways will work with the Promoter to agree timelines for the activities for their project, taking into account the project's particular circumstances.

5. Applying the Programme to a specific third party project

- 5.1 Early engagement with National Highways is key to developing a Programme which ensures National Highways' Key Requirements are considered in a methodical way, as the project and associated SRN works develop from the earliest stages, to the options assessment, to the preferred option and the preliminary design.
- 5.2 Ensuring that SRN related aspects of the project are included in the development of the options, help de-risk the project by maximising the likelihood of National Highways being able to support the project, through the Pre-application stage and through the DCO examination.
- 5.3 In order for key matters to be agreed in advance of the DCO submission, the Programme of Activities recommends that engagement is based on meeting two milestones during the Pre-application stage. Firstly, NH reviews an options report which accounts NH's key requirements and secondly, the Preliminary Design for the preferred option is reviewed and agreed in principle.
- 5.4 Our aim is that Promoters engage with us in a detailed, collaborative manner from the early stages of their project, which would allow us to work together and to agree key matters in line with the following milestones:
 - National Highways' Key Requirements are understood and considered, in the assessment and development of options
 - The base modelling and forecast modelling are agreed and inform the Options Assessment
 - The Preferred Option is confirmed following consultation on the highways options with National Highways
 - The Preliminary Design for the SRN works is agreed in principle prior to the DCO submission
 - Key application documents relating to National Highways are reviewed and agreed prior to the DCO application being submitted, including the draft Transport Assessment, draft DCO wording (including our protective provisions and any DCO requirements relevant to National Highways) and the Statement of Common Ground

- 5.5 It is important to note that, whilst agreeing the above matters prior to DCO submission should be National Highways' aim for any third party NSIP which we engage with, it is recognised that for different reasons it is sometimes the case that matters are not agreed in this time. For example, it is not uncommon for the DCO examination to commence with a number of key matters, including the modelling and highway design, still to be agreed between National Highways and the Promoter.
- 5.6 Nevertheless, the sequencing and dependencies between the key National Highways milestones identified in the Programme of Activities remain the same, regardless of whether the milestones are met prior to the DCO submission. Figure 1 below lays out the critical path for National Highways being able to support the project during the DCO Examination stage.

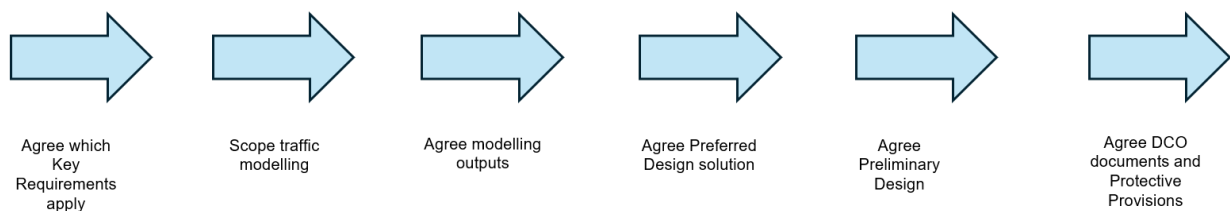


Figure 1: Critical path of activities for enabling National Highways to support a third party DCO

6. Activities at different Programme stages

- 6.1 This section outlines the key outcomes which National Highways will seek to achieve during our engagement with the Promoter, at different stages of the project lifecycle, culminating in the submission of the DCO application.

6.2 Initial Engagement

Early engagement meetings

The initial engagement stage is crucial in de-risking the project, in terms of ensuring the impacts on the SRN are assessed appropriately, an appropriate highways design solution is agreed and costly, abortive work is minimised.

Effective early engagement serves dual purposes which help achieve this; are fundamental to maximising the likelihood of National Highways being able to support the project and ultimately an appropriate highways solution to be delivered:

1. It ensures the Promoter understands National Highways' aims and objectives, including our Key Requirements and helps them to factor these into their SRN options assessment.
2. It allows National Highways to understand the project and form an initial view of the potential impacts and our resultant modelling requirements,

advise the Promoter on which Key Requirements apply to the project and must be satisfied, as well as other areas of particular concern.

Generally, the early engagement meetings will cover:

- Information about the project, including the nature, scale and location, potential SRN interfaces and any further information about potential SRN works which may be available at that time
- The Promoter's overall project Programme
- National Highways' Key Requirements
- Agree the Operating Model for collaborative engagement going forward

Initial view of Key Requirements and areas of assessment

Following the early engagement meetings, National Highways will carry out a Strategic Assessment to inform an initial view on areas of the SRN requiring assessment and other key areas which the Promoter should consider in their development of highways options, including:

- Safety profile
- Junction capacity issues
- Future-proofing
- Other SRN projects
- Critical design challenges
- Environmental receptor data and soft estate improvement plans
- Construction approach (high level)
- National Highways' template Protective Provisions

There are three key outputs from the Initial Engagement phase which we will seek to achieve:

1. National Highways can confirm which of our Key Requirements are relevant to the project and must be satisfied.
2. Key principles agreed for any SRN realignments, crossings and/or new connections (see Key Requirements).
3. Agree a project-specific Programme for National Highways related matters.

The result of effective initial engagement is that it increases the likelihood of the Promoter developing highways options which are acceptable to National Highways. It also has the benefit of allowing both parties to resource plan effectively, by understanding the key matters early in the process, ensuring that the parties can work together effectively and efficiently, potentially resulting in cost savings for the Promoter. For example, the more effective early engagement is, the better National Highways is equipped to advise on the level of details required for matters at different stages and thereby able to produce a more robust cost estimate for our engagement. Helping the Promoter mobilise resources at the right time.

6.3 Options Assessment

Development of options

The aim of this stage is to help de-risk the project by ensuring that appropriate matters relating to the SRN are considered in a proportionate way, in the development of highways options and allowing National Highways the opportunity to review the options against an agreed sift criteria, which then informs the Preferred Option.

The key step early in this stage is to agree the modelling approach, before the Promoter carries out their base traffic modelling. Once the base modelling is agreed, they will carry out their forecast traffic modelling.

It is also important early in this stage, for National Highways to determine the initial future-proofing requirements, which will help inform the modelling approach and development of highway design options. The Future-proofing requirements will be kept under review as the project progresses.

It is recommended to agree a governance and assurance framework early in this stage, to ensure that any highway works are subject to appropriate assurance and governance, e.g., National Highways' Project Control Framework (PCF). This will inform the different products which the Promoter is required to produce through their Programme. The assurance framework should be agreed before any decision points relating to the highways design are reached.

The Promoter may wish to consider potential design options as the modelling work progresses, although it should be noted that National Highways cannot agree to any SRN scheme without the modelling being agreed. We recommend that the Future Year Without Scheme ('Do Minimum') traffic flows, should be agreed before they start developing the highway design options, to minimise risk of abortive working.

Before detailed work on highways design options commences, it is also important to confirm the following:

- The options sift criteria
- Assessments and surveys needed to inform the options, e.g., Walking, Cycling, and Horse-Riding Assessment (WCHAR)
- Design Standards that the works will adhere to, i.e., the Design Manual for Roads and Bridges (DMRB).

The options sift criteria and any associated products necessary to inform this, will vary from project-to-project depending on the nature of the SRN intervention(s), some examples of products may include:

- Departures from Standards checklist

- Stage Management Plan
- Structures Options Report
- Preliminary Sources Study and Ground Investigation Scope Report
- Technology Impact Report
- Tunnel Design Authority Report

NOTE: National Highways would not expect the design work to go into granular detail prior to the Preferred Option being confirmed, but it will need to be of a sufficient level to ensure that any matters which may affect what is the Preferred Option are factored into the Options Assessment, for example any critical Departures from Standard, i.e. departures that are fundamental to the viability of the scheme and the likelihood of these being acceptable. Please refer to the 'Departure Criticality' matrix contained in the [National Highways Departures Manual](#) (page 33) for further advice.

At the same time, a number of other activities can be undertaken which can help inform the options, including:

- Lands records search for National Highways land which the project may require for acquisitions, access or easements during construction or operation. This would commence with a Land Interest questionnaire to the Property Enquiries team.
- Consideration of the construction approach/methodology. It may be in the Promoter's interests to consider some construction related matters at this stage, to help inform the Preferred Option, before addressing this topic in more detail for the Preliminary Design and beyond. National Highways will advise the Promoter about the appropriate time and level of detail to consider construction-related matters for their specific project, relevant matters may include:
 - In-situ vs. modular construction
 - Forms of structures
 - On- line vs off-line
 - Phasing
 - Access and egress
 - Highway/Lane closures

Preferred Option

National Highways will seek to review the options against the options sift criteria which can help the Promoter in refining their proposals and working towards the Preferred Option. Key steps during this period for information the Preferred Option include:

- Agree the highway scheme model
- Review and update of design products, E.g., Structures Options Report, Technology Impact Report etc.)
- Promoter prepares a Maintenance and Repair Statement
- National Highways prepares the Commuted Lump Sum Order of Magnitude Estimate. We recommend that these are prepared prior

to the Preferred Option being confirmed, in order for this to be considered in the options assessment

- National Highways consulted on EIA Scoping
- Identify principal construction considerations

It is also important at this point for both parties to agree the Preliminary Design products to be produced, once the Preferred Option is confirmed.

The stage culminates in agreeing in principle the Preferred Option.

6.4 Development of Highway Solutions and Consents

Once the Preferred Option is confirmed, our engagement will focus on reaching agreement in principle on the Preliminary Design.

In addition to the operational traffic modelling, construction traffic modelling will need to be agreed in order for us to support the Preliminary Design.

Whilst high level design work will be carried out to inform the Preferred Option, there will be a large amount of more detailed design activity once the Preferred Option is confirmed, in order to agree the Preliminary Design. The specific deliverables should be produced in line with the agreed assurance framework, examples include:

- GG119 Stage 1 Road Safety Audit
- GG104 Safety Risk Assessment
- Departures from Standards Checklist
- Structures - including Structures Options Report; Approvals in Principle (AiP) checklist; Outline AiP
- Technology, including Applications for Roadside Electricity Connections (Exit Points); Regional Operational Control Centre (RCC or ROC) Technology and Capacity Implications Report
- Construction Safety Plan; Traffic Management Plan

Further to the products required through the assurance framework, other matters recommended to address prior to agreeing the Preliminary Design include:

- Confirm compliance with National Highways' future-proofing requirements
- National Highways review the Preliminary Environmental Design findings
- Agree any land acquisitions, access or easements in principle
- Signing Strategy
- Other design-related work, E.g., drainage strategy
- Agree commercial and procurement approach for roadside technology

- Preliminary Environmental Design findings (to understand implications on soft estate and any environmental assets expected to handover to National Highways)
- Consider interfaces with other parties' works on the network, which may impact the project's construction Programme
- National Highways reviews the Promoter's draft DCO (including the Protective Provisions)

Agreeing the Preliminary Design will confirm the limits to development (Order Limits) and any land acquisition, transfer and/or rights sought by the Promoter.

National Highways' aim is that the Preliminary Design is agreed in advance of the DCO application being submitted and with enough time in between for us to review draft documents to be included with the application, that reflect the agreed Preliminary Design. Such documents (drafts) would include:

- Impacts Assessment
 - Transport Assessment
- Environment
 - Environmental Masterplan
 - Environmental Management Plan
- Construction
 - Outline Construction Traffic Management Plan (oCTMP)
 - Workforce Travel Plan
 - Buildability Report
- Lands and Legal
 - Book of Reference
 - Draft DCO (including Protective Provisions, Articles and Requirements where National Highways is a named consultee)

This stage should culminate in agreeing the key content, such as that outlined above, necessary to protect National Highways' interests and ensure the project and associated SRN works are delivered in line with what has been agreed with National Highways, allowing us to agree a Statement of Common Ground which can help support the project.

6.5 DCO application submission

The purpose of this Programme of Activities is to provide an indicative, best practice sequencing of key activities that maximises the likelihood of key matters of relevance to National Highways, being agreed prior to the DCO application being submitted.

With this achieved, will enable National Highways to support the project through our engagement in the application process as required by the Examining Authority, e.g., submitting Relevant and Written Representations, producing a Principal Areas of Disagreement Summary Statement (PADSS), responding to

Examining Authority questions and attendance at Draft DCO, compulsory acquisition and issue specific hearings.

However, it is acknowledged that it is not always possible to agree key matters prior to the DCO application being submitted (as per section 5), and National Highways will continue to engage with the Promoter throughout the application process to resolve any issues. The more key matters are not agreed prior to the DCO application being submitted, the higher the risk to both parties. National Highways and the Promoter must make every effort to resolve issues relating to the SRN and National Highways' interests by the end of the DCO Examination. Failure to do so would represent significant risk to the Promoter's project, as National Highways may be left with no option but to object to the application. We will work collaboratively with Promoters as much as possible to avoid this scenario, and the aim is for the indicative Programme of Activities and this accompanying guidance to be useful tools in shaping our engagement effectively to help us support the project.