A46 Coventry Junctions (Walsgrave) Scheme number: TR010066

7.2 National Networks National Policy Statement Accordance Tables

APFP Regulation 5(2)(q)

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A46 Coventry Junctions (Walsgrave)

Development Consent Order 202[x]

NATIONAL NETWORKS NATIONAL POLICY STATEMENT ACCORDANCE TABLES

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1 Introduction

1.1 Purpose of this document

1.1.1 These National Networks National Policy Statement (NPS NN) Accordance Tables (these "Accordance Tables") relate to an application made by National Highways (the "Applicant") to the Secretary of State for Transport via the Planning Inspectorate (the "Inspectorate") under section 37 of the Planning Act 2008 (the "2008 Act") for a Development Consent Order (DCO). If made, the DCO would grant consent for the A46 Coventry Junctions (Walsgrave) Scheme (the "Scheme"). A detailed description of the Scheme can be found in Environmental Statement (ES) Chapter 2 (The Scheme) (**TR010066/APP/6.1**).

1.1.2 The NPS NN sets out the government's policies in respect of delivery of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks and for strategic rail freight interchanges in England. The NPS NN provides planning guidance for promoters of NSIPs, the basis for the examination of the DCO application by the appointed Examining Authority and against which the Secretary of State will make their decision. Further details about the NPS NN can be found in the Case for the Scheme (**TR010066/APP/7.1**).

1.1.3 These Accordance Tables form part of a suite of application documents and are included in the application for development consent in compliance with Regulation 5(2)(q) of the Infrastructure Planning (Prescribed Forms and Procedure) Regulations 2009 (the "APFP Regulations") which requires:

"…any other documents considered necessary to support the application".

1.1.4 These Accordance Tables provide an assessment of the Scheme's alignment and conformity with the NPS NN. These Accordance Tables are set out as follows:

- Table 1: Scheme's conformity with Chapter 4 of the NPS NN, General polices and consideration.
- Table 2: Scheme's conformity with Chapter 5 of the NPS NN, Generic impacts

1.1.5 Conformity with Chapter 3 of the NPS NN, 'The need for development of the national networks' is set out in the Case for the Scheme (**TR010066/APP/7.1**)

1.1.6 These Accordance Tables reference other relevant documents submitted with the application for development consent and provide a summary where relevant. The following documents and assessments have been used to inform these Accordance Tables:

- Draft Development Consent Order (**TR010066/APP/3.1**)
- Consents and Agreements Position Statement (**TR010066/APP/3.3**)
- Consultation Report (**TR010066/APP/5.1**) and Consultation Report

Annexes (**TR010066/APP/5.2**)

- ES (**TR010066/APP/6.1**), ES Figures (**TR010066/APP/6.2**) and ES Appendices (**TR010066/APP/6.3**)
- Biodiversity Net Gain Report (ES Appendix 8.1 (**TR010066/APP/6.3**))
- Habitats Regulations Assessment Report – (ES Appendix 8.12 (**TR010066/APP/6.3**))
- Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**))
- Water Framework Directive Assessment (WFD) (ES Appendix 13.2 (**TR010066/APP/6.3**))
- First Iteration Environmental Management Plan (EMP) (**TR010066/APP/6.5**)
- Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**)
- Case for the Scheme (**TR010066/APP/7.1**)
- Transport Assessment (**TR010066/APP/7.3**)
- Scheme Design Report (**TR010066/APP/7.4**)
- Outline Traffic Management Plan (**TR010066/APP/7.5**)
- Equality Impact Assessment (**TR010066/APP/7.6**)
- Outline Carbon Management Plan - Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**)

2 NPS NN Accordance Tables

National Networks National Policy Statement (NPS NN) – March 2024 (designated May 2024) Accordance Tables with the NPS NN

Table 1: Chapter 2 National Networks

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
National networks in a greener world **Conserving and enhancing the natural world**		
2.16	The environment is a complex system of cause and effect that connects human, built and natural elements. Rather than a series of unrelated components, changes to one part of the system may affect others. Applicants should look for opportunities to design infrastructure with a holistic approach to avoiding, or, where adverse impacts are unavoidable, mitigating and as a last resort compensating impacts on the natural, historic or built environment, on landscapes and on people by using nature-based solutions.	An Environmental Statement (ES) (**TR010066/APP/6.1**) has been submitted as part of the DCO application. The ES meets the requirements of Regulation 14 of the Infrastructure Planning (EIA) Regulations 2017. ES Chapters 5 to 15 (**TR010066/APP/6.1**) provide details of the assessments that have been undertaken for the Scheme, including assessment of the potential impacts of the Scheme, a description of the likely significant effects on the environment and sets out proposals for mitigation to reduce and, if possible, offset likely significant adverse effects. The assessments in the ES (**TR010066/APP/6.1**) have been undertaken in line with the relevant sections of the Design Manual for Roads and Bridges (DMRB). An assessment of alternatives for the Scheme is set out in ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**). As stated in ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**), the mitigation hierarchy from DMRB LA 104 paragraph 3.23 will be considered for all environmental features throughout the Scheme's lifecycle, this has been considered throughout the ES Chapters. Adverse impacts of the Scheme on environmental features would as a first measure be avoided where feasible, and where they cannot be avoided would be appropriately mitigated for. If required, compensation would be undertaken where significant residual effects upon ecological features exist after mitigation in accordance with DMRB LD 118. However, compensation measures are not anticipated for the Scheme. The mitigation presented on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) has been designed holistically to include a number of benefits for the Scheme and the natural environment, this includes creation of habitat

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		including scrub, grassland, woodland and three drainage features two of which would be designed to be permanently wet ponds and planted with aquatic species, representing a nature-based solution incorporated into the sustainable urban drainage system (SuDS). This is also discussed in section 13.10 of ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and set out in the Drainage Strategy (ES Appendix 13.6 (Drainage Strategy Report) (**TR010066/APP/6.3**)).

Table 2: Chapter 4 – General policies and considerations

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
General principles of assessment		
4.2	There is a presumption in favour of granting development consent for national networks Nationally Significant Infrastructure Projects (NSIPs) that fall within the need for infrastructure established in this National Policy Statement (NPS) and which comply with the policies in this NPS.	The A46 Coventry Junctions (Walsgrave) Scheme (the "Scheme") is part of the Government's commitment to improve the A46 'Trans-Midlands Trade Corridor' between the M5 and the Humber Ports as set out in the Road Investment Strategy (RIS 1 and RIS 2). The Scheme is an NSIP within sections 14(1)(h) and 22(1)(b) of the Planning Act 2008 set out in Section 1 of the Case for the Scheme (**TR010066/APP/7.1**). Section 2 of the Case for the Scheme (**TR010066/APP/7.1**) articulates the need for the Scheme. Following the completion of the Binley Junction improvement scheme in 2023 the Walsgrave Junction is the only remaining roundabout east of Coventry and north of Tollbar End Junction that is at grade, and as such is a pinch point for traffic. The Tollbar End Junction and M6 Smart Motorway improvements have increased the pressure on Binley and Walsgrave Junctions. This document sets out the Scheme's compliance with the policies contained within the NPS NN.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
4.4	Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate requirements in the Development Consent Order. If development consent is granted for a proposal and a later stage the applicant wishes, for technical or commercial reasons, to construct it in such a way that it is outside the terms of what has been consented (for example because its extent will be greater than has been provided for in terms of the consent), it will be necessary to apply for a change to be made to the Development Consent Order. The application to change the consent should be in line with the government's guidance on the procedures for making a change to a Development Consent Order for NSIPs and may need to be accompanied by environmental information to supplement that which was included in the original environmental assessment.	The Scheme design is described in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**) and details are shown on the Engineering Drawings and Sections (**TR010066/APP/2.5**) and General Arrangement (**TR010066/APP/2.6**). At the DCO application stage the Scheme is at a preliminary design stage. The detailed design stage converts the preliminary design into detailed design and build construction drawings for use by the build Contractor. At this stage the preliminary design will be refined and informed by additional investigations. However, any design refinement would be controlled by the following factors: • The draft DCO (**TR010066/APP/3.1**) which contains powers of lateral and vertical limits of deviation as shown on the Works Plans (**TR010066/APP/2.3**). • The limits of deviation as described in the draft DCO (**TR010066/APP/3.1**) and the Explanatory Memorandum (**TR010066/APP/3.2**). • The approach to the assessment of the limits of deviation in the Environmental Impact Assessment (EIA) as set out in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**). • Draft DCO Requirement 3 requires that "*the authorised development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the engineering drawings and sections unless otherwise agreed in writing by the Secretary of State…provided that the Secretary of State is satisfied that any amendments…would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement*".
4.5	Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, and those likely to have an interest in the proposed application, is strongly encouraged in line with the government's pre-application guidance.	The Applicant has undertaken a range of pre-application engagement activities with key stakeholders, including statutory consultees and those likely to have an interest in the Scheme throughout its development. Full details are contained within the Consultation Report (**TR010066/APP/5.1**), its Annexes (**TR010066/APP/5.2**), and throughout the ES Chapters 1-15 (**TR010066/APP65.1**). Coventry City Council, Rugby Borough Council and Warwickshire County Council were consulted on the adequacy of consultation for the Scheme. An Adequacy of Consultation Milestone Statement (AoCM) was submitted to the Planning

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		Inspectorate on 18 October 2024, this included the responses from these Local Authorities. A Covering Letter and completed Section 55 Checklist (**TR010066/APP/1.2**) has been submitted for the Application showing that the Applicant has complied with the statutory requirements for consultation and the government's pre-application guidance.
Business Case		
4.6	Applications for road and rail projects (with the exception of those for strategic rail freight interchanges, for which the position is covered in paragraph 4.10 of the NPS NN) will normally be supported by a business case prepared in accordance with Treasury Green Book principles and the Department's Transport Business Case guidance and Transport Analysis Guidance. Transport Appraisal Process assesses the cost, benefits and risks of alternative ways to meet government objectives. It helps decision makers to understand the potential effects, tradeoffs and overall impact of options by providing an objective evidence base for decision making. The purpose of the economic dimension of the business case is to identify the proposal that delivers best public value to society, including the wider social and environmental benefits. The business case provides the basis for investment decisions, and the economic, environmental and social impacts of a development that underpin it will also be important for the consideration by the Examining Authority or the Secretary of State of the impacts and benefits of a proposal. However, the purpose of the business case is not to ascribe a monetary value to every factor in the planning balance. It should also be note that the economic case is one of five cases that comprise the business case, and government decision on funding are based on all five.	The business case has been prepared in accordance with the guidance set within the Department for Transport's guidance on the assessment of major transport investments (WebTAG) and is compliant with the Treasury Green Book principles Section 5 of the Case for the Scheme (**TR010066/APP/7.1**)) summarises the economic assessment of the Scheme, presenting the anticipated economic benefits and dis-benefits. The ES (Chapters 5-15) set out the environmental benefits and disbenefits of the Scheme (**TR010066/APP/6.1**). The economic appraisal (See Case for the Scheme (**TR010066/APP/7.1**)) has sought to assess the full range of economic, environmental, social benefits and impacts resulting from the Scheme, in line with Transport Analysis Guidance (TAG). Costs and benefits have been quantified, or 'monetised' as part of a cost benefit analysis, wherever possible. The Scheme demonstrates a significant number of benefits, building upon previous improvements to the A46 Binley Junction and contributing to wider economic benefits along the wider A46 corridor, particular economic efficiency for business users and providers (monetary value of £65 million) and reliability benefits of (monetary value of £8 million). The Scheme generates a Present Value Benefit (PVB) of £82.4 million and a Present Value Cost (PVC) of £56 million. This results in an initial Benefit to Cost Ratio (BCR) of 1.47 which suggests that for each pound of Broad Transport Budget expenditure, £1.47 of benefit to public value is expected to be generated.

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		In line with TAG guidance, wider economic impacts (WEIs) and journey time reliability (JTR) are not part of the Level 1 BCR and therefore these are considered in the Level 2 benefits and the corresponding adjusted BCR. The Scheme generates an adjusted PVB of £100.11 million and a BCR of 1.78 when the Level 2 benefits are included. Non-monetised benefits of the Scheme are included Section 5 of the Case for the Scheme, to summarise, these include - Social impacts - such as improved journey quality, reduced severance, increased accessibility to a range of opportunities including jobs and family. - Environmental impacts – environmental enhancement and Biodiversity Net Gain (BNG), reduced noise near primary schools, decreases of NO_2 to medium deprived areas.
4.7	The information provided on the economic, environmental and social impacts of a development that underpins the business case will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State's consideration of the benefits and impacts of a proposed development. It is expected that schemes brought forward through the Development Consent Order process by virtue of section 35 of the Planning Act 2008, should also meet this requirement.	The Case for the Scheme (**TR010066/APP/7.1**) sets out the planning balance which includes considerations of the economic, environmental and social impacts of the Scheme which underpin the business case (the environmental impacts are demonstrated throughout the ES Chapters (**TR010066/APP/6.1**)). The economic benefits are set out in the Case for the Scheme (**TR010066/APP/7.1**).
4.8	The Department's Transport Analysis Guidance is updated regularly. This is to allow the evidence used to inform decision-making to be up to date. Where updates are made during the course of preparing analytical work, the updated guidance is only expected to be used where it would be material to the investment decision and in proportion to the scale of the investment and its impacts.	The Transport Assessment (**TR010066/APP/7.3**) has relied upon latest TAG, with references made throughout the various topic chapters.
Local Transport Model		

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
4.9	Applications for road and rail projects should be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The modelling will usually include national level factors around the key drivers of transport demand such as economic growth, demographic change, travel costs and labour market participation, as well as local factors. The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around the key drivers of transport demand. An assessment of benefits and costs of schemes under a range of scenarios should reflect future uncertainty, in addition to the core case. The modelling should be proportionate to the scale of the scheme and include appropriate sensitivity analysis to consider the effects of uncertainty on project impacts.	Details of the modelling used are set out in Section 3 of the Transport Assessment (**TR010066/APP/7.3**). The traffic modelling assessment comprises of a strategic multi-modal model which covers Coventry as well as the wider Warwickshire area. The strategic modelling assessment is used as the basis to derive forecasted traffic impacts of the Scheme's performance across the wider area. The strategic model utilised for the preliminary design work has been developed in line with TAG. A local traffic operational (micro-simulation) model of the Walsgrave Junction has also been developed to assess the Scheme's operational performance in the forecast year scenarios. The framework of the modelling assessment has been developed to enable the comparative analysis of the operation of the existing A46 Walsgrave Junction layout against the proposed scheme design. The comparative assessment is used to evaluate the performance of the Scheme against the scheme objectives. Therefore, the modelling analysis details the Scheme's impacts with respect to congestion relief, journey time savings, reliability improvements and accident reductions (although a small shift towards a higher severity is seen). The modelling assessment comprises of a strategic multi-modal model. The model utilised for the assessment of the scheme is called the Coventry Area Strategic Model. For the option development stage of the A46 Walsgrave Junction assessment, a new 2019 base year transport model was developed from the Midlands Regional Transport Model (MRTM) in 2020. As part of preliminary design, it was agreed to update the model to utilise the underlying demand from the Midlands Regional Transport Model 2 (MRTM2) in development of the Stage 3 Coventry Strategic Transport Model. The model covers the whole UK with the level of detail increasing with proximity to the Scheme. The Area of Detailed Modelling (AoDM) is the area within which significant changes in flow and speed due to the Scheme may be expected to occur. The AoDM has been specified as detailed, simulation, network.

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		The extent of the traffic model and level of coding detail needs to be such that it allows for the accurate representation of existing and forecast traffic flows. Outside of the AoDM, a Fully Modelled Area (FMA) was identified where, at Stage 2, links were represented as 'buffer' with no detail of junction operation. However, the level of detail included in the upgraded MRTM2 would be lost were the buffer conversion and link reduction process carried out in Stage 2 repeated. As such, in discussion with National Highways Transport Planning Group, the simulation coding in the AoDM and extended the area of simulation coding to encompass all of the FMA. In agreement with National Highways Transport Planning Group, two sensitivity tests were assessed which are the High and Low Economy Common Analytical Scenarios.
Environmental Assessment		
Note: *Through the Levelling Up and Regeneration Act 2023, the government has secured powers to replace the existing EU generated systems of Environmental Impact Assessment and Strategic Environmental Assessment with a new process of environmental assessment – Environmental Outcome Reports (EoRs). The powers are enabling powers and require regulations to bring the new system into play. Environmental assessment would still be required and if introduced relevant plans and projects would have to comply with such regulations. Until a new system is implemented, current legislation on environmental assessment continues to apply and references to assessments in chapter 5 of the NPS NN can be set out in an Environmental Statement.*		
4.12	A key part of the environmental assessment is the consideration of cumulative effects. The applicant should provide information on how the effects of the proposals would combine and interact with the effects of other development, where relevant. For most practical purposes this means the applicant should consider the impact of other existing and committed developments within an appropriate geographical area and assess the additional impact of their own development. Other evidence, for example, from a Transport Business Case, appraisals of sustainability of relevant NPSs or strategic environmental assessment or plan level Habitats Regulation Assessment of development plans may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required. There is no single or agreed approach to assessing the cumulative impacts of environmental effects due to some effects being limited to a specific	ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**) considers the likely combined and cumulative effects of the Scheme with proposed and committed developments. Section 15.3 of this Chapter explains the methodologies for both the combined and cumulative effects assessments. In line with DMRB LA 104, the assessment methodology for combined effects involves the identification of effect interactions associated with the Scheme upon a receptor or group of receptors, to identify the overall environmental effects of the Scheme. The assessment considers residual effects, after mitigation has been taken into account. The assessment of cumulative effects follows the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment with the four stages of assessment:

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	geographical boundary but others, such as the impact and effect of carbon emissions on climate change, not being geographically limited. For this reason, it may be necessary for different approaches to be taken to assess the cumulative impact of different environmental effects. The Secretary of State should consider how the accumulation of, and interrelationship between, effects identified in the environmental assessment might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	• Stage 1: Establish the Zone of Influence (ZOI) and identify a long list of 'other developments'. This is available in ES Appendix 15.1 (Cumulative Effects Long and Short List) (**TR010066/APP/6.3**) • Stage 2: Identify shortlist of 'other developments' for the cumulative effects assessment. This is available in ES Appendix 15.1 (Cumulative Effects Long and Short List) (**TR010066/APP/6.3**) • Stage 3: Information gathering • Stage 4: Assessment Two developments met the criteria for inclusion in the short list of developments in ES Appendix 15.1 (Cumulative Effects Long and Short List) (**TR010066/APP/6.3**). ES Figure 15.1 (Cumulative Effects Shortlisted Developments) (**TR010066/APP/6.2**) shows the developments from the short list and study area. It is not anticipated that the Scheme would result in any significant cumulative effects with these other developments. Whilst there are mutual receptors identified for Landscape and Visual and Biodiversity, it is not anticipated that these would give rise to a significant cumulative effect. To assess the combined effects (i.e. where there may be several types of impacts upon the same receptor) the ZOI is based on the study areas of the environmental topics detailed in the preceding ES chapters. The assessment concludes that as a result of the residual effects of the Scheme, as a single project it is anticipated that there may be two significant combined effects during construction, in relation to Hungerley Hall Farm and Coombe Pool Site of Special Scientific Interest (SSSI). Combined effects on Coombe Pool SSSI are also discussed in ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**). During operation, as a single project it is anticipated that there may be significant combined effects on Hungerley Hall Farm, due to visual effects in Year 1 and 15 of operation and impacts on farming, in relation to permanent land take, access and infrastructure disruption and farming activities. Visual effects on this receptor are discussed further in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). Impacts relating to agriculture are discussed further in ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**).

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4.13	In some instances, it may not be possible at the time of application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in their application which elements of the proposal have yet to be finalised and the reasons why this is the case. Where some details are yet to be finalised applicants should set out, to the best of their knowledge, what the worst case scenario of the proposed development may be (for example in terms of site area) and assess the potential adverse effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.	The Scheme design is described in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**) and details are shown on the Engineering Drawings and Sections (**TR010066/APP/2.5**) and General Arrangement (**TR010066/APP/2.6**). At the point of the DCO application being made, the Scheme is at a preliminary design stage. The detailed design stage converts the preliminary design into detailed design and build construction drawings for use by the build Contractor. At this stage the preliminary design will be refined and informed by additional investigations, such as targeted, more accurate topographical surveys. However, any design refinement would be controlled by the following factors: • The draft DCO (**TR010066/APP/3.1**) which contains powers of lateral and vertical deviation as shown on the Works Plans (**TR010066/APP/2.3**). • The limits of deviation as described in the draft DCO (**TR010066/APP/3.1**) and the Explanatory Memorandum (**TR010066/APP/3.2**). • The approach to the assessment of the limits of deviation in the EIA as set out in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**). • Draft DCO (**TR010066/APP/3.1**) Requirement 3 (Detailed Design) requires that "*the authorised development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the engineering drawings and sections unless otherwise agreed in writing by the Secretary of State…provided that the Secretary of State is satisfied that any amendments…would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement*". The First Iteration EMP (**TR010066/APP/6.5**) and has been developed in support of the DCO to construct and operate the Scheme. It is based on the preliminary design of the Scheme for which development consent is being applied. Management plans included in the First Iteration EMP (**TR010066/APP/6.5**) are: · EMP Appendix B.1 Outline Construction Air Quality and Dust Management Plan · EMP Appendix B.2 Outline Construction Noise and Vibration Management Plan · EMP Appendix B.3 Outline Site Waste Management Plan · EMP Appendix B.4 Outline Landscape and Ecology Management Plan

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		· EMP Appendix B.5 Outline Construction Communication Strategy · EMP Appendix B.6 Unexpected archaeological finds protocol · EMP Appendix B.7 Historical building recording Written Scheme of Investigation · EMP Appendix B.8 Outline Carbon Management Plan The Second Iteration EMP will be produced which reflect the mitigation measures required by the Register of Environmental Actions and Commitments (REAC) (Appendix A of First Iteration EMP (**TR010066/APP/6.5**)) and set out in the ES and includes various management plans and method statements. This is secured by Requirement 4 of the Draft DCO (**TR010066/APP/3.1**). Management plans to be included are: a) Carbon Management Plan; b) Construction Air Quality and Dust Management Plan; c) Construction Communication Strategy; d) Construction Noise and Vibration Management Plan; e) Historical Building Recording Written Scheme of Investigation; f) Invasive Non-native Species Management Plan; g) Landscape and Ecology Management Plan; h) Materials Management Plan; i) Operational Unexploded Ordnance Emergency Response Plan; j) Site Waste Management Plan; k) Soil Handling Management Plan; l) Water Monitoring and Management Plan; and m) Unexpected Archaeological Finds Protocol. The EMP (Third Iteration) as set out in Requirement 5 to the draft DCO (**TR010066/APP/3.1**) will set out measures to be adopted during the operational phase. Elements of the design that will be refined at detailed design are set out throughout the Scheme Design Report (**TR010066/APP/7.4**). Elements of the Scheme that will be further developed at the detailed design stage include: • Signage Strategy • Landscape and Ecological Management Plan (LEMP) • Structural design • Environmental mitigation design

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• Bridge design • Lighting design • Design of the B4082 • Tree works within SSSI The indicative construction programme for the Scheme has been informed by Octavius Infrastructure Ltd. as National Highways' appointed Principal Contractor, although some aspects are likely to be refined during the detailed design stage. The impacts of construction activities are considered in each chapter of the ES (**TR010066/APP/6.1**). Standard best practice construction techniques that will be adopted are set out in the First Iteration EMP (**TR010066/APP/6.5**).
Habitats Regulation Assessment		
4.14	Under the Habitats Regulations, the relevant competent authority, in this case the Secretary of State, must consider whether it is possible that a plan or project could likely have significant effects, (either alone or in combination with other plans or projects) on a protected site which forms part of the UK National Site Network (Special Areas of Conservation and Special Protection Areas), or on any site to which the same protection is applied as a matter of policy (i.e. listed or proposed Ramsar sites, potential Special Protection Areas, possible areas of Special Areas of Conservation and sites used to compensate for adverse effects on habitats sites). The term 'habitats site' is used to refer collectively to such sites throughout this NPS. Such an assessment should be made with due regard to the conservation objectives of any relevant habitat site(s).	A Habitat Regulations Assessment Report has been produced (ES Appendix 8.12) (**TR010066/APP/6.3**) The assessment concludes that the Scheme is unlikely to have any likely significant effects on any National Site Network Sites and therefore an Appropriate Assessment is not considered to be required. ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**) considers the likely cumulative effects of the Scheme with proposed and committed developments. Two developments met the criteria for inclusion in the short list of developments in ES Appendix 15.1 (Cumulative Effects Long and Short List) (**TR010066/APP/6.3**). It is not anticipated that the Scheme would result in any significant cumulative effects with these schemes. Whilst there are mutual receptors identified for Landscape and Visual and Biodiversity, it is not anticipated that these would give rise to a significant cumulative effect.
4.15	Where appropriate, assessments under the Habitats Regulations should be coordinated with other assessments.	See the response to NPS NN paragraphs 4.12 and 4.14.
4.16	The applicant should seek the early advice of the appropriate Statutory Nature Conservation Body and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether or not the plan or project	See the response to NPS NN paragraph 4.14. Table 8-1 in Section 8.4 of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) details the ongoing engagement undertaken as part of this assessment, which includes

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	should proceed to the Appropriate Assessment stage of Habitats Regulations Assessment.	consultation with Natural England, and other statutory bodies such as the Environment Agency. Through extensive consultation as outlined in Table 8-1, the conclusions on no local significant effects on any Habitats Sites was not disputed or raised as a concern by Natural England. Consultee comments were received in response to the Environmental Scoping Report (National Highways, June 2023). The Applicant's responses to the Environmental Scoping Opinion (**TR010066/APP/6.8**) are contained in the ES Appendix 4.1 (Scoping Opinion Response) (**TR010066/APP/6.3**). Responses in relation to the statutory consultation held between October and December 2023 are presented in the Consultation Report (**TR010066/APP/5.1**). Table 3-1 of the Consultation Report (**TR010066/APP/5.1**) provides a summary of engagement with stakeholders, which includes Natural England. A Habitats Regulations Assessment screening exercise was undertaken to inform the preliminary design stage, as reported in ES Appendix 8.12: Habitats Regulations Assessment Screening Report (**TR010066/APP/6.3**) to determine whether an Appropriate Assessment would be required regarding the Scheme's potential impact upon any sites of European importance (Special Areas of Conservation (SACs), candidate or possible SACs (cSACs or pSACs), Special Protection Areas (SPAs), potential SPAs (pSPAs) and Ramsar sites). This report concluded that no further assessment of European designated sites was required and so these are not discussed further within the report. The Habitats Regulations Assessment Report (ES Appendix 8.12) (**TR010066/APP/6.3**) considers potential effects on National Site Network (NSN) Sites, as required under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations), implementing Article 6(3) of the Habitats Directive (92/43/EEC). As required under Regulation 63, the assessment is undertaken by the Secretary of State in relation to an order granting development consent, based upon information provided within the report and supporting appendices, representations made by Natural England and, where the Secretary of State considers it appropriate, taking the opinion of the general public.

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4.17	Where a proposed plan or project is considered likely to have a significant effect on a habitats site, the applicant must provide sufficient information with the application to enable the competent authority to make an appropriate assessment of these likely effects in view of the site's conservation objectives. The assessment may consider the effect of any mitigation measures and the Statutory Nature Conservation Body must be formally consulted on the assessment and its advice considered. The applicant should also consider agreeing and Evidence Plan with the Statutory Nature Conservation Body to help determine the information required.	It has been determined in the Habitat Regulations Assessment (ES Appendix 8.12) (**TR010066/APP/6.3**) that the Scheme is unlikely to have any likely significant effects on habitats sites. See the response to NPS NN paragraph 4.14 and 4.16.
4.18	Such plans or projects may only proceed if the assessment concludes they will not adversely affect the integrity of the site or, in the case of a negative assessment, there are no alternative solutions, and they must proceed for imperative reasons of overriding public interest. The applicant must demonstrate that they have sought advice from the Statutory Nature Conservation Body on whether any proposed compensation is appropriate to maintain the overall coherence of the National Sites Network. They must also show that the compensation secured to maintain the overall coherence of the National Sites Network. Provision of such information will not be taken as acceptance of adverse effects on integrity and if an applicant disputes the likelihood of adverse effects, it can provide this information without prejudice to the Secretary of State's final decision of the effects of the potential development on the habitats site. If, in these circumstances, and applicant does not provide information required for the assessment of potential derogation, there will be no expectation that the Secretary of State will allow the applicant such opportunity to provide the information following the examination.	See response to NPS NN paragraph 4.14 and 4.16.
4.19	During the pre-application stage, and without prejudice to the formal Habitats Regulations Assessment of the submitted plan or project, if the Statutory Nature Conservation Body gives an early indication that, irrespective of any anticipated mitigation measures, the proposed development is highly likely to lead to adverse effects on	See response to NPS NN paragraph 4.14 and 4.16.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	the integrity of one or more habitats sites, the applicant must include in their application such information required to assess a potential derogation under the Habitat Regulations.	
Alternatives		
4.20	Applicants should comply with all legal requirements, and any policy requirements set out in this NPS, on the assessment of alternatives. For example, current requirements include: • Where applicable, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require projects with significant environmental effects to include a description of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects; • there may also be other specific legal requirements for the consideration of alternatives, for example, under the Habitats Regulations and Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 • there may also be policy requirements in the NPS, for example, flood risk sequential test and the assessment of alternatives for developments in National Parks, the Broads, and Areas of Outstanding Natural Beauty (now known as National Landscapes) – where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternative considered, in compliance with these requirements and in a proportionate manner.	The Scheme has been subject to a full options appraisal process as described in the Case for the Scheme (Section 2 Scheme Development and options Considered (**TR010066/APP/7.1**)) and ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**) in compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, other legal requirements, and requirements of this NPS, in particular paragraphs 4.22. ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**) summarises the main Scheme alternatives that have been considered and, sets out the assessment methodology, reasonable alternatives studied and the justification for the chosen option. The potential significant effects on the environment were taken into account when assessing options. Section 3.3 of ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**) explains how the thirty potential options were developed as part of the Strategic Options Report and Staged Overview of Assessment Report processes. These were assessed to identify their performance against environmental, engineering, transportation and economic criteria. The preferred route was identified, and subsequently amended following consultation, as the best option to meet the defined need and objectives, including the delivery of a comprehensive set of benefits. A Flood Risk Assessment has been undertaken (see Appendix 13.1 to the ES (**TR010066/APP/6.3**). This includes details of the sequential test.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
4.21	National road or rail schemes that have been identified in relevant Road or Rail Investment Strategies will have been subject to an options appraisal process where relevant in line with existing Transport Analysis Guidance, and proportionate consideration of alternatives will have been undertaken as part of the investment decision making process. The options appraisal may include other viable options for achieving the objectives of the project, including (where appropriate) other modes of travel, regulation, or other ways of influencing behaviour in line with Department for Transport guidance. The Examining Authority and the Secretary of State should satisfy themselves that the options appraisal process has been undertaken.	See response to NPS NN paragraph 4.20. The initial feasibility studies and options appraisal used criteria from the DfT resulted in the Schemes inclusion in the Government's Road Investment Strategy for 2015-2020 (RIS1). The Scheme has also been included as a committed project in RIS 2 for the period 2020-2025- *"A46 Coventry Junctions – grade separation of the Binley and Walsgrave roundabouts on the A46 near Coventry, upgrading the trunk sections of the A45/A46 between the M6 and M40 to a consistent standard."*
4.22	Where an options appraisal process has been undertaken, it should not be necessary to consider alternatives except where paragraph 4.20 applies or where the wholly "exceptional circumstances" test set out in case law is met. In those exceptional circumstances where alternatives might be relevant, consideration of them should be proportionate. Where alternative schemes proposed are vague or inchoate, or have no real possibility of coming about, they are either irrelevant, or where relevant, will be given little or no weight, and the extent to which they are considered should be determined accordingly.	See response to NPS NN paragraph 4.20.
Biodiversity net gain		
4.23	Biodiversity net gain delivers measurable improvements for biodiversity by creating, enhancing, maintaining and monitoring habitats in association with developments. Biodiversity net gain should be applied in conjunction with the mitigation hierarchy and does not change or replace existing environmental obligations. In addition to provide net gains for biodiversity, applicants should also identify and deliver appropriate opportunities for nature recovery and wider environmental enhancements	Biodiversity net gain (BNG) has been considered as part of the design-development and assessment processes. ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3**) presents the results of the UKHab survey. This concludes the area-based habitats recorded within the site include modified grassland, other broadleaved woodland, bramble scrub, mixed scrub, cereal crops and linear foliage habitats include native hedgerows, native hedgerows with trees, native hedgerows – associated with a bank or ditch and native hedgerows with trees – associated with a bank or ditch. The area-based habitat baseline has been calculated as 130.77 units, and the

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		linear-foliage baseline as 28.62 units, in accordance with the Statutory Biodiversity Metric. Post-construction BNG calculations based on the Environmental Masterplan ES Figure 2.4 (**TR010066/APP/6.2**) have identified a +11.87% and +15.38% net gain for area-based and linear hedgerow habitats respectively. As the Scheme is a NSIP it is not subject to mandatory BNG under the Environment Act 2021. Further details are provided in ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3).** A schedule of planting mixes and an Outline Landscape and Ecology Management Plan (OLEMP) (Appendix B.4 of the First Iteration Environmental Management Plan (EMP) (**TR010066/APP/6.5**)) have been produced to support the DCO application. The OLEMP will be updated in the detailed design stage to include necessary management prescriptions and monitoring requirements to achieve and maintain the targeted conditions. The OLEMP will cover a minimum of 28 years post construction, as this is the longest time to target condition with the Statutory Biodiversity Metric calculations. As stated in ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**), the mitigation hierarchy from DMRB LA 104 paragraph 3.23 has been considered for all environmental features throughout the Scheme's lifecycle. In addition to net gains for biodiversity, wider environmental enhancements have been provided as part of the Scheme, for example, the creation of two attenuation ponds, hedgerows and lines of trees, species-rich grassland, woodland and scrub habitats along the Scheme would create more foraging habitat for birds, bats, badgers, hedgehogs and polecats within the Order Limits. As such the creation of these areas of scrub and grassland can be considered an enhancement, providing habitat for species including birds, bats, badgers, invertebrates, hedgehog and polecat. This enhancement of terrestrial habitats within the Order Limits would also enhance Hungerley Hall Farm Ecosite. See ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**).

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4.24	Applicants are encouraged to use the latest version of biodiversity metric (as advised by Defra) to calculate their biodiversity baseline and inform their biodiversity net gain outcomes and should present this data as part of their application.	Details of the biodiversity metric used to appraise the Scheme are set out in ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3**). The latest version of the metric has been used (November 2023) (Statutory Metric). See the response to NPS NN paragraph 4.23.
4.25	Biodiversity net gain can be delivered onsite or wholly or partially off-site and should also be set out within the application for development consent. When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example, by increasing habitat connectivity or enhancing other ecosystem service outcomes. Reference should be made to any local nature recovery strategies (which should be the primary reference point for those delivery biodiversity net gain off-site) and other relevant national and local plans and strategies, such as green infrastructure strategies, used to inform biodiversity net gain delivery.	ES Appendix 8.1(Biodiversity Net Gain Report) (**TR010066/APP/6.3**) sets out how BNG will be delivered onsite. See the response to NPS NN paragraph 4.23. As stated in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), at the time of writing the ES the Local Nature Recovery Strategies for Warwickshire and the West Midlands have not been published. However, the Applicant has engaged directly with Warwickshire County Council ecology team early in the preliminary design stage. Coombe Abbey Park Estates Team were consulted with regards to opportunities to deliver habitat creation and/or enhancement opportunities off-site for BNG and potential areas for off-site delivery of bat and bird mitigation and potential opportunities are being explored. The Council suggested that management of an off-site delivery area could be achieved through the use of a Section 39 Wildlife and Countryside Act 1981 agreement which would allow the Council to enter into a land management agreement. Warwickshire County Council were also consulted about potential opportunities for off-site habitat creation and/or enhancement related to BNG. However, BNG delivery and biodiversity enhancement for the Scheme can be achieved within the Order Limits. There is no requirement for off-site enhancement(s) at this stage. ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) shows the environmental mitigation included for the Scheme, including creation of habitat.
4.26	The Environment Act 2021 contains provisions for a mandatory biodiversity net gain statement for NSIPs. A government Biodiversity Net Gain Statement will set out the concept and policy requirements for biodiversity net gain for Nationally Significant Infrastructure Projects (NSIPs). When these provisions are commenced, the Secretary of State will need to be satisfied that the biodiversity net	As a NSIP submitting a DCO application in late 2024, the Scheme is not subject to mandatory BNG under the Environment Act 2021. The Government Biodiversity Net Gain Statement has not yet been published; however, the Scheme will achieve over 10% net again as detailed in ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3**). See the response to NPS NN paragraph 4.23.

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	gain objective in any relevant Biodiversity Net Gain Statement has been met.	
Criteria for good design for national network infrastructure		
4.27	Applicants should include design as an integral consideration from the outset of a proposal. Applying good design to national networks projects should not be limited to general aesthetics. The National Infrastructure Commission have developed four Design Principles: • Climate – mitigate carbon emissions and adapt to climate change. It includes opportunities to enable decarbonisation, incorporates flexibility, and builds resilience against climate change. The functionality of projects, including fitness for purpose, resilience, and sustainability, is equally important. • People - helping to improve the quality of life for local communities. It promotes inclusion, cohesion and increases accessibility. It creates safe spaces with clean air that improve health and wellbeing. • Places – well designed infrastructure gives places a strong sense of identity, and through that forms part of our national cultural heritage. Creating a sense of place, connecting communities, addressing community severance, and integrating into its surroundings. It makes a positive contribution to the local landscape within and beyond the project boundary. Good design enhances local culture and character and supports local ecology, delivering through biodiversity net gain, while protecting wildlife corridors and irreplaceable nature assets and habitats. • Value - adding value by defining issues clearly from the outset. Good design also finds opportunities to add value beyond the main purpose of the infrastructure to consider the wider benefits savings on cost, the environment, materials, and space. It is efficient in the use of material resources, sustainable materials and energy used in construction.	The design principles and objectives of the Scheme are considered in the Scheme Design Report - Sections 3 and 4 (**TR010066/APP/7.4**). Table 3-1 of the Scheme Design Report (**TR010066/APP/7.4**) demonstrates how the four National Infrastructure Commission (NIC) Design Principles are covered by the NH 10 Design Principles. Table 4-1 of the Scheme Design Report (**TR010066/APP/7.4**) sets out how the four NIC design principles have been applied to the Scheme Within the Scheme Design Report (**TR010066/APP/7.4**) Table 3-1 summarises the policies that specifically relate to design in the NPS NN and maps them to the ten design principles in the Road to Good Design. This demonstrates that by following the ten design principles, this is consistent with the criteria for good design as required by the NPS NN. Table 4-1 sets out how the Scheme design reflects the ten design principles contained in the Road to Good Design.
4.28	A good design should meet the principal objectives of the scheme by applying the mitigation hierarchy to avoid, eliminate or substantially	The design principles and objectives of the Scheme are considered in the Scheme Design Report - Sections 3 and 4 (**TR010066/APP/7.4**). This explains that there are

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	mitigate, or as a last resort compensate for the identified problems and existing adverse impacts, by improving operational conditions, simultaneously minimising adverse impacts and contributing to the conservation and enhancement of the natural, built and historic environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account economic, social, and environmental impacts.	10 principles of good design which should be implemented by a Scheme, as identified within Highways England's 'The road to good design' (2018). These cover the principal objectives identified in the NPS. Accordingly, good design: • makes roads safe and useful • is inclusive • makes roads understandable • fills in context • is restrained • is thorough • is environmentally sustainable • is innovative • is long lasting • is a collaborative process. The Scheme Design Report describes how the Scheme applies the above design principles in order to meet the objectives. As stated in ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**), the mitigation hierarchy from DMRB LA 104 paragraph 3.23 will be considered for all environmental features throughout the Scheme's lifecycle.
4.29	In light of this, scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable, having regard to appropriate industry good design guidance, and that the applicant has considered, as far as possible, both functionality (including fitness for purpose and sustainability) and aesthetics (including the scheme's contribution to the quality of the area in which it would be located).	See response to NPS NN paragraph 4.27 and 4.28. Section 6 of the Case for the Scheme (**TR010066/APP/7.1**) also sets out how the Scheme is sustainable development. In terms of aesthetics, the design fits within the built and landscape context and the Scheme is restrained, minimising impact on existing infrastructure and the environment, see the Scheme Design Report (**TR010066/APP/7.4**).
4.30	Applicants should have regard to appropriate guidance and plans such as: local nature recovery strategies, Local Air Quality Action Plans, the Green Infrastructure Design Guide, the purposes and Management Plans of National Parks, National Landscapes, the	The Scheme has been developed in accordance with a range of relevant guidance, standards and plans including the DMRB.

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	Broads and any local design codes. For road schemes, the Design Manual for Roads and Bridges contains design standards for motorways and all-purpose trunk road projects.	Reference to the guidance, plans and standards used are referenced in the following documents: • ES Chapters 5 – 15 and the respective appendices (**TR010066/APP/6.1** and **TR010066/APP/6.3**) • First Iteration EMP (**TR010066/APP/6.5**) • Transport Assessment (**TR010066/APP/7.3**) • Outline Traffic Management Plan (OTMP) (**TR010066/APP/7.5**)
4.31	In their application, applicants should be able to demonstrate how the design process was conducted, effective engagement with communities and stakeholders and how the proposed design evolved to maximise design outcomes. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected with a clear articulation of the benefits. The Examining Authority and the Secretary of State should consider the ultimate purpose of the infrastructure and the operational, safety and security requirements which the design must satisfy.	The Scheme Design Report (**TR010066/APP/7.4**) sets out the process for developing the Scheme design and should be read in conjunction with the Consultation Report (**TR010066/APP/5.1**). ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**) shows how the proposed Scheme design has evolved from the options selection stage and the reasoning for changes as a result of the statutory consultation and as the Scheme design has been progressed. In addition to statutory and non-statutory consultation with stakeholders and the public, preliminary design included consultation with environmental technical specialists, a wide range of statutory and non-statutory consultees and members of the public. The Consultation Report (**TR010066/APP/5.1**) and Consultation Report Annxes (**TR010066/APP/5.2**) demonstrate how the Applicant conducted consultation on the scheme design and how the Scheme design was updated responding to feedback from the consultations, this is includes the non-statutory options consultation held between January and February 2022, the statutory consultation held between October and December 2023, and further targeted and statutory consultation held between August and September 2024.
4.32	Applicants should consider taking independent professional advice on the design aspects of a proposal, from the earliest design stage. A project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Applicants should also commission an independent design review of their proposals prior to planning. The Design Council can provide or signpost recommendations for this service.	The design was developed by a professional, independent engineering design consultancy employed by the Applicant. The design has applied industry approved standards and good design principles as summarised in the Scheme Design Report (**TR010066/APP/7.4**). In terms of aesthetics, the design fits within the built and landscape context and the Scheme is restrained, minimising impact on existing infrastructure and the environment.

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		Design reviews are an integral part of the process for delivering the 10 design principles in the Road to Good Design. National Highways has created an independent design review panel of built environment experts. The review panel impartially evaluates Scheme design with a remit to constructively challenge design approach. The panel helps to deliver Schemes which benefit local communities and the environment. They provide Scheme specific observations and general recommendations that help National Highways put good design at the heart of network improvements. At the Preliminary Design stage, a Design Panel was set up by the Scheme Team. A Scheme briefing and site visit was carried out on 17 June 2024, with key attendees from the Design Panel and the Scheme Team in attendance. The Scheme briefing included a site walkover, panel discussion and presentation. The Scheme Team received the Design Panel's confidential letter of advice on the 27 June 2024. A summary of the advice received and how the Scheme Team responded to this advice is provided in **Error! Reference source not found.**Table 5-1 of the Scheme Design Report (**TR010066/APP/7.3**).
Climate change adaption		
4.35	Article 7 of the Paris Agreement establishes a global goal on adaption – of enhancing adaptive capacity, strengthening resilience, and reducing vulnerability to climate change in the context of temperature goal of the Agreement. It aims to significantly strengthen national adaption efforts, including through support and international cooperation.	This paragraph is noted. Please see response to NPS NN paragraph 4.37.
4.36	To support planning decisions, the government produces a set of UK Climate Projections and has developed a National Adaption Programme. In addition, the government's Adaption Reporting Power invites authorities (a defined list of public bodies and statutory undertakers, including National Highways, Network Rail and the	Please see response to NPS NN paragraph 4.37.

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	Office for Rail and Road) to assess the risks presented by a changing climate, include policies and actions to address climate risk and set out progress made.	
4.37	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts. For example, as a result of protecting against flood risk, there may be consequential impacts on coastal change (see paragraphs 5.101 to 5.116). If this happens, the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impact guidance set out in chapter 5 of this NPS.	The Scheme has been designed with respect to commitments set out in the Paris Agreement (2015). ES Chapter 14 (Climate) (**TR010066/APP/6.1**) considers the Scheme's effect on climate (i.e. increases in carbon emissions) as well as the potential vulnerability of the Scheme to climate change (i.e. the resilience of Scheme assets to projected changes in climate). The Scheme has been designed to prevent consequential impacts from adaptation measures. The adaptation measures have been discussed within the Design, mitigation and enhancement measures section of ES Chapter 14 (Climate) (**TR010066/APP/6.1**) for Climate Change Resilience. An Outline Carbon Management Plan (Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**)) has also been submitted as part of the Application, it outlines the framework for managing and reducing the greenhouse gas (GHG) emissions the Scheme. This document outlines the project-specific context as well as the carbon quantification methodology, carbon target review and the development of carbon mitigation strategies, of which all are required to be implemented from the outset of project development/initiation. All construction and operational activities and materials associated with the Scheme will result in carbon emissions contributing to a negative impact on the climate. Residual effects will arise as it is not currently feasible to fully eliminate emissions resulting from the production of road building materials, construction activities, as well as energy use and end-user traffic emissions during Scheme operation. To reduce carbon emissions, the following measures are applied in accordance with the carbon emissions reduction hierarchy of PAS 2080:2023: • Avoid: the design seeks to increase the potential for re-using and/or refurbishing existing assets to reduce the extent of new construction required or explore alternative lower carbon options to deliver the project objectives.

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		• Switch: apply low carbon solutions (including technologies, materials and products) to reduce resource consumption during the construction, operation, user's use of the project, and at end-of-life; and construct efficiently: use techniques that reduce resource consumption over the lifecycle of the project. • Improve: after addressing steps 1 and 2, projects will identify, assess and integrate measures to further reduce carbon through on-site or off-site offsetting or sequestration. The Outline Carbon Management Plan (Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**)) sets out how construction and operational emissions and, where applicable, emissions from maintenance activities, have been reduced as much as possible using the carbon reduction hierarchy (e.g., as set out in PAS2080). This says priority should be given to low-carbon solutions that promote network and system decarbonisation as far as possible (including nature-based solutions). A Carbon Management Report will be prepared at the end of each work stage and follow National Highways guidance. This will include opportunities to include the embedment of nature- based solutions and technological solutions to mitigate, capture or offset the emissions of construction. The risks by posed by climate change have been reported within the Climate Change Resilience Assessment section of ES Chapter 14 (Climate) (**TR010066/APP/6.1**) as well as in ES Chapter 13 (Road Drainage and the Water Environment (**TR010066/APP/6.1**)) and the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)).
4.38	In preparing the measures to support climate change adaption applicants should consider whether nature-based solutions could provide a basis for such adaption. In addition to avoid further carbon emissions when compared with some more traditional adaption approaches, nature-based solutions can also result in biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere (see also paragraphs 5.190 to 5.203) on the role of green infrastructure).	See the response to NPS NN paragraph 4.35. An Outline Carbon Management Plan, Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**) has been produced for the Scheme which outlines different mitigation measures to minimise the carbon emissions from construction. This says priority should be given to low-carbon solutions that promote network and system decarbonisation as far as possible (including nature-based solutions).

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		The Outline Carbon Management Plan (Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**)) will be developed into a Carbon Management Report will be prepared at the end of each work stage and follow National Highways guidance. This will include opportunities are to include the possible embedment of nature-based solutions and technological solutions to mitigate, capture or offset the emissions of construction (e.g. through sustainable urban drainage systems (SuDs), woodland creation or low carbon technology). A Carbon Management Report is a requirement of the Section Iteration EMP as secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**). The mitigation presented on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) includes creation of habitat including scrub, grassland, woodland and three drainage features two of which would be designed to be permanently wet ponds and planted with aquatic species, representing nature-based SuDS solutions. This is also discussed in section 13.10 of ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and set out in the Drainage Strategy (ES Appendix 13.6 (Drainage Strategy Report) (**TR010066/APP/6.3**)).
4.39	New national networks infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. flooding of road or rail infrastructure) and indirect (e.g. flooding of other parts of the road or rail network) impacts of climate change when planning the location, design, build, operation and maintenance. The Secretary of State will need information on how the proposal will take account of projected impacts of climate change and remain resilient.	See comments relating to NPS NN Paragraph 4.35 and refer to ES Chapter 14 (Climate) (**TR010066/APP/6.1**). As set out in section 13.8 of ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and section 7 of the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)), the Scheme will attenuate new drainage systems to the greenfield runoff rate, up to a 1 in 100-year rainfall event including a 20% climate change allowance, with a sensitivity test undertaken with a 40% allowance.
4.40	The Secretary of State should be satisfied that applications for new national networks infrastructure have taken into account the potential direct and indirect impacts of climate change. This should include using the latest UK Climate Projections and associated research and expert guidance (such as the Environment Agency's Climate Change Allowances for Flood Risk Assessments) applicable at the time the environmental assessment was prepared as part of the	See response to NPS NN paragraph 4.35. ES Chapter 14 (Climate) (**TR010066/APP/6.1**) shows the latest UK climate projections have been used and reported in the Climate Change Resilience Assessment section of this chapter. Information on the climate baseline and future projections are based on accessible available information from third parties,

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	Development Consent Order application, to ensure they have identified mitigation and adaption measures. This should cover the estimated lifetime of the new infrastructure, with a high level of climate resilience built-in from the outset. The applicant should also be able to demonstrate how the proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. Should a revised set of UK Climate Projections or associated research be applicable after the preparation of environmental assessment, the Examining Authority should consider whether they need to request further information from the applicant.	including the historical meteorological variables recorded by the Met Office and the UK Climate Projections (UKCP18) also developed by the Met Office. The adaptation measures have been discussed within the 'Design, mitigation and enhancement measures' section of ES Chapter 14 (Climate) (**TR010066/APP/6.1**) for Climate Change Resilience. As set out in section 13.8 of ES Chapter 13 (Road Drainage and the Water Environment (**TR010066/APP/6.1**) and section 7 of the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)), the Scheme will attenuate new drainage systems to the greenfield runoff rate, up to a 1 in 100-year rainfall event including a 20% climate change allowance, with a sensitivity test undertaken with a 40% allowance.
4.41	The Secretary of State should be satisfied that there are no features of the design of new national networks infrastructure critical to its safety or operation which may be seriously affected by more radical changes to the climate. Beyond that projected in the latest set of UK climate projections and taking account of the latest credible scientific evidence on, for example, sea level rise. The Secretary of State should also be satisfied that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	ES Chapter 14 (Climate) (**TR010066/APP/6.1**) considers the Scheme's effect on climate (i.e. increases in carbon emissions) as well as the potential vulnerability of the Scheme to climate change and climate hazards in its lifetime (i.e. the resilience of Scheme assets to projected changes in climate) (lifetime is set as 60 years). The adaptation measures have been discussed within the Design, mitigation and enhancement measures section of this chapter for Climate Change Resilience. A climate change resilience assessment which follows the methodology detailed in DMRB LA 114 has been undertaken. Where the climate change impact on project receptors is potentially significant, a risk assessment shall be undertaken. Once climate hazards have been identified as part of the detailed design stage, a risk assessment of those impacts on the operational phase and their likelihood and consequences will be completed. The accurate identification of potential climate hazards is only possible at detailed design stage. Any further design and mitigation measures are then incorporated, and then residual effects will be reassessed to, where practicable, reduce the significance of effect to an acceptable level (not significant). An Outline Carbon Management Plan, Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**), has been produced for the Scheme. The Outline Carbon Management Plan and ES Chapter 14 (Climate) (**TR010066/APP/6.1**), Section

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		14.10, includes different mitigation measures to minimise the carbon emissions in design and construction.
4.42	Any adaption measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the Environment Agency's Climate Change Allowances for Flood Risk Assessments. Any adaption measures must themselves be assessed as part of any environmental assessment, which should set out how and where such measures are proposed to be secured.	See the response to NPS NN paragraph 4.40 and 4.41. Section 2 of the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) identifies the relevant legislative and planning policy framework for the Scheme. The DMRB LA 113 requires the latest climate change allowances to be applied, and the Flood Risk Assessment cites the Department for Environment Food & Rural Affairs climate change allowances accessed in April 2024 (as agreed with the Environment Agency). The sizing of the attenuation features proposed as part of the scheme takes into account the climate change allowances and they are assessed as part of the ES and the FRA as being inherent in the design of the Scheme. (see ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)).

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4.43	Adaption measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example, coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaption measure could be implemented should the need arise, rather than at the outset of the development (for example, reserving land for future extension or increasing the height of existing, or requiring new, sea walls). In these circumstances, the applicant should make a case to justify implementing adaption measures later, set out clearly how the design could be adapted and have mechanism in place (such as Development Consent Order requirements) for monitoring and implementing of these future adaption measures.	See the response to NPS NN paragraph 4.40, 4.41 and 4.42. In line with DMRB LA 114 the operation of the Scheme is required to manage, maintain and monitor asset data to ensure the Scheme is operating as intended. Adaptive management would be employed during the operational period where it is necessary to adapt the asset management in response to climate impacts. Where appropriate, additional interventions would be determined and implemented. During detailed design a detailed monitoring plan would be determined in line with the requirements for the Scheme and the planned operational procedures. However, it is noted that climate change projections are likely to change within the appraisal period of the Scheme, and therefore its vulnerability to such changes should be reviewed as and when updated projections become available. See ES Chapter 14 (Climate) (**TR010066/APP/6.1**). All the measures incorporated into the Scheme to mitigate against climate change are incorporated into the design and will be constructed as an integral part of the design.
Pollution control and other environmental regulatory regimes		
4.46	Issues relating to discharges, emissions or abstractions from a proposed project which lead to direct or indirect impacts on air quality, water quality and land quality, or which include noise, light and vibration, may be subject to separate regulation, under the pollution control framework or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated.	Details of other regulatory consents to be sought for the Scheme not secured under the draft Development Consent Order (**TR010066/APP/3.1**) are set out in the Consents and Agreements Position Statement (**TR010066/APP/3.3**). A Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) has also been prepared setting out whether the Scheme could cause a statutory nuisance under section 79(1) of the Environmental Protection Act 1990. Although some construction and operational activities have the potential to create a nuisance, these would be controlled through mitigation as set out in the ES Chapters 5-15 (**TR010066/APP/6.1**) and the First Iteration EMP (**TR010066/APP/6.5**), and subsequent iterations secured by the draft DCO (**TR010066/APP/3.1**). With the identified mitigation in place, none of the statutory nuisances identified in Section 79(1) of the EPA are predicted to arise during the construction or operation of the Scheme. See response to NPS NN paragraph 4.56.

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4.48	The Environmental Permitting Regulations regime requires industrial facilities to have an Environmental Permit and to meet the requirements of that permit to operate. These requirements include limits on allowable emissions to air, land or water, Best Available Techniques, where available, and other requirements such as monitoring. In considering the impacts of the project, including residual impacts, the Secretary of State may wish to consult the regulator on any management plans that would be included in an Environmental Permit application. Applicants are encouraged to begin pre-application discussions with relevant regulators, such as the Environment Agency and the Marine Management Organisation, as early as possible. This is especially the case where applicants wish to parallel track Development Consent Order and Environmental Permits applications. This will help ensure the applications take account of the relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority.	The Consents and Agreements Position Statement (**TR010066/APP/3.3**) provides a full list of the consents, licences and permits that may be required as part of the Scheme, out with the powers of the DCO, including environmental permits. Environmental permits will be applied for separately, the Applicant is in discussion with the Environment Agency, local authorities and other statutory bodies regarding permits that may be required.
4.49	Applicants must consult the Marine Management Organisation on national networks NSIPs which could affect any relevant marine areas as defined in the Planning Act 2008 (as amended by section 23 of the Marine and Coastal Access Act 2009). Applicants are encouraged to consider the relevant marine plans in advance of consulting the Marine Management Organisation. The Secretary of State's consent may include a deemed marine licence and the Marine Management Organisation will advise on what conditions should apply to the deemed marine licence. The Secretary of State, the Examining Authority and the Marine Management Organisation should co-operate closely to ensure that national networks NSIPs are licensed in accordance with legislation.	The Scheme does not affect any marine areas.
4.50	In considering an application for development consent, the Examining Authority and the Secretary of State should consider whether the development itself is an acceptable use of land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State will	The Case for the Scheme Section 6 (**TR010066/APP/7.1**) sets out the need for the Scheme in this location and how it accords with planning policy in terms of its land use acceptability.

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	assume that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.	The impacts of processes, emissions and discharges from the Scheme, including reference to how the regulations have been taken into account in the relevant assessments are considered throughout the ES Chapters (**TR010066/APP/6.1**) and Appendices (**TR010066/APP/6.3**). The First Iteration EMP (**TR010066/APP/6.5**) sets out the control of processes, emissions and discharges through the construction process. Detailed design is secured through Requirement 3 of the draft DCO (**TR010066/APP/3.1**): Draft DCO Requirement 3 requires that "*the authorised development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the engineering drawings and sections unless otherwise agreed in writing by the Secretary of State…provided that the Secretary of State is satisfied that any amendments…would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement*". The Second Iteration EMP is secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). The Second Iteration EMP would include many of the management plans that will demonstrate compliance with the regulatory regimes (as set out the response to NPS NN paragraph 4.13).
4.51	The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency and/or the pollution control authority, and other relevant bodies, such as the Marine Management Organisation, the Statutory Nature Conservation Bodies, Drainage Boards, and water and sewerage undertakers before consenting any potentially polluting developments, to ensure that: • the relevant regulator is satisfied that potential releases can be adequately regulated under the regulatory framework. • the effects of existing sources of pollution in and around the site are not such that the cumulative effect of the pollution when the proposed development is added would make the development	The Environment Agency and the Lead Local Flood Authorities (LLFA) (Coventry City Council and Warwickshire County Council) have been consulted throughout the development of the Scheme. The mitigation proposed is consistent with best practice guidelines and the outcome of the assessments undertaken follows DMRB guidelines. Further details can be found in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)), the Water Framework Directive Compliance Assessment (WFD) (ES Appendix 13.2 (**TR010066/APP/6.3**)) and the Water Quality Assessment (ES Appendix 13.3 ((**TR010066/APP/6.3**)). Table 8-1 of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) details consultation and engagement with Natural England and the Environment Agency, and Consultation Report (**TR010066/APP/3.1**). The impacts of the Scheme are considered throughout the ES (**TR010066/APP/6.1**). The First Iteration EMP

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	unacceptable, particularly in relation to statutory environmental quality limits.	(**TR010066/APP/6.5**) outlines the control of processes, emissions and discharges through construction of the Scheme. The Second Iteration EMP is secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). The Management plans for the First Iteration EMP (**TR010066/APP/6.5**) and Second Iteration EMP are as set out the response to NPS NN paragraph 4.13. ES Chapter 15 (Combined of Cumulative Effects) (**TR010066/APP/6.1**) assesses the combined and cumulative effects arising from the Scheme.
4.52	The Secretary of State should not refuse consent because of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences, or other consents would not be granted.	See the response to NPS NN paragraph 4.48.
Common law nuisance and statutory nuisance		
4.55	It is very important that, during the examination of a nationally significant infrastructure project, possible sources of nuisance under section 79(1) of the (Environmental Protection Act 1990) the 1990 Act, and how they may be mitigated or limited, are considered by the Examining Authority so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent. More information on the consideration of possible sources of nuisance is at paragraphs 5.117 to 5.125.	Potential sources of nuisance have been considered with regard to proceedings in respect of statutory nuisance and are dealt with in the Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) in accordance with section 79(1) of the Environmental Protection Act 1990 and regulation 5(2)(f) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations 2009). Article 48 (Defence to proceedings in respect of statutory nuisance) of the draft DCO (**TR010066/APP/3.1**) and Explanatory Memorandum (**TR010066/APP/3.1**) also deal with statutory nuisance
4.56	When considering whether to include exceptions to the defence in an order granting development consent (section 158(3) of the Planning Act 2008), the Secretary of State should have regard to whether any nuisance is an inevitable consequence of the development.	See the response to NPS NN paragraph 4.56. The Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) considers the potential for the Scheme to cause a statutory nuisance under the Environmental Protection 1990 Act (EPA). The construction and operational activities that have the potential to create a nuisance would be controlled through mitigation as set out in the First Iteration EMP (**TR010066/APP/7.5**). The First Iteration EMP would be developed into a Second Iteration EMP for each part for implementation during construction and is secured through Requirement 4 of the draft DCO (**TR010066/APP/3.1**). A Third Iteration

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		EMP will be submitted and approved by the Secretary of State following consultation, The Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) concludes that with mitigation in place, none of the statutory nuisances identified in Section 79(1) of the EPA are predicted to arise during the construction or operation of the Scheme.
Road Safety		
4.57	Highways developments provide an opportunity to make significant safety improvements and significant incident reduction benefits when they are well designed. Some developments may have safety as a key objective, but even where safety is not the main aim of the development the opportunity should be taken to improve safety, including introducing the most modern and effective safety measures where proportionate. Consideration should also be given to wider transport objectives, including expanding active travel, and creating safe and pleasant walking, wheeling and cycling environments. In developing road schemes the applicant should have due regard to the needs of drivers and riders and the imperative to ensure road user safety. Schemes should be developed with a mindset that accounts for the need for motorists to rest, particularly Heavy Good Vehicles drivers who need safe and secure roadside facilities that also cater for their welfare needs including the appropriate provision of high-quality washrooms, a catering offer and access to alternative fuel and digital infrastructure.	The Scheme will address safety operational issues by reducing congestion at the Walsgrave Junction, along the A46 and the B4082. It has been designed and will be built to current standards as set out in the DMRB. The design of the Scheme has incorporated features to enhance safety to users, such as new VRS, warning signage of new layouts and agricultural traffic, new speed limits and appropriate lighting. The Scheme is designed to generate a reduction in accidents by upgrading the A46 Walsgrave Junction. The Transport Assessment (**TR010066/APP/7.3**) provide more detail on the safety benefits – the introduction of the Scheme leads to: • to a decrease in overall accidents, although a small shift towards a higher severity is seen. • Improved safety on local roads due to reduced traffic using that part of the network. • Improved safety on the wider SRN when taking account safety as a result of Binley and Walsgrave functioning together; and comparatively in regard to the levels of traffic reassigned to the SRN. The Transport Assessment (**TR010066/APP/7.3**) provides a summary of the existing road safety record on the A46 and a forecast impact of the Scheme on accidents. It also provides responses to the road safety audit (RSA) undertaken for the Scheme, including the designer's response on behalf of the Applicant, in order to demonstrate the suitability of the Scheme design in safety terms. Section 4 of the Case for Scheme (**TR010066/APP/7.1**) summarises the analysis of accidents and concludes overall that the Scheme would have a beneficial impact in

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		terms of reducing accidents. In summary, the introduction of the Scheme leads to a decrease in overall accidents. Although a decrease in number of accidents and casualties is seen, the monetary valuation is a disbenefit as more the accidents are more serious. In both cases, this is attributable to a shift from accidents on local roads to the SRN as traffic reroutes onto the A46. With regards to walking, cycling and horse-riding (WCH), minimising the impacts of the Scheme on WCH is an integral part of Scheme design and this has been achieved by maintaining connectivity and incorporating new facilities to enhance existing networks. The Scheme would improve strategic and local connectivity in Coventry and the wider area provides opportunities for future WCH routes to come forward as outlined in ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**). Improvements to facilities for walkers, cyclists and horse-riders are provided through provision of a signalised pedestrian crossing on the B4082. With regards to WCH provision, the Scheme incorporates enabling works for future WCH provision to be provided by others. This includes additional earth works which provides verge widening along the new section of the B4082 link road to accommodate the future provision of a segregated walking and cycling route and a section of shared use path by others. The Applicant has also retained the Hungerley Hall Farm accommodation bridge and will continue to maintain the asset. These enabling works have the potential to facilitate a new route from Clifford Bridge Road and the Binley Cycleway (to be delivered by Coventry City Council) to Coombe Abbey Park in the future, at a substantially reduced cost and disruption. Such a route would connect with committed and proposed future active travel schemes within Coventry and Warwickshire local authority areas. The Scheme does not provide any additional rest areas for Heavy Goods Vehicles (HGV) drivers. Parking laybys are currently located on the northbound and southbound carriageways of the A46 mainline between the Walsgrave Junction and the M6/M69 junction. Emergency telephones are located at these laybys. The usage levels of the laybys are currently unknown. As set out in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**), the two existing public laybys on the A46 would be removed. Due to the distance between the existing M6/M69 junction and the new proposed Walsgrave Junction there is not a sufficient length to allow a public layby to be incorporated safely. The Scheme

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		includes the construction of a maintenance layby (see Work No 1I on Sheet 4 of the Works Plans (**TR010066/APP/2.3**).
4.58	The applicant should undertake an objective assessment of the impact of the proposed development on safety including the impact of mitigation measures. This should use the methodology outlined in the guidance from the Department for Transport's Transport Analysis Guidance and from National Highways. They should also put in place arrangements for undertaking the road safety audit process and ensuring their implementation. Road safety audits are a mandatory requirement for highway improvement schemes in the UK (including motorways). Road safety audits are intended to ensure that operational road safety experience is applied during the design and construction process so that the number and severity of collisions is as low as reasonably practicable.	See the response to NPS paragraph 4.57. The requirements resulting from the road safety audit undertaken at Preliminary Design stage have been incorporated into the Scheme design where appropriate. Section 7 of the Transport Assessment (**TR010066/APP/7.3**) provides an assessment of the overall impact of the Scheme on road safety. It provides a summary of the existing road safety record on the A46 near Coventry and the forecast impact of the Scheme on accidents over a 60-year appraisal period. The strategic model utilised for the Scheme has been developed in line with the DfTs TAG. Department for Transport Stats19 accident data records have been analysed, over the 2015-2019 period, to identify all reported accidents which have occurred across the Scheme impact area. The data set includes details of all recorded slight, serious and fatal accidents across the time period. Where no observed data was available, default accident rates have been used. This information has been adopted to provide observed accident rates as an input to the COBA-LT (Cost-Benefit of Accidents - Light Touch) modelling assessment. COBA-LT software undertakes the analysis of the impact on accidents as part of the economic appraisal for a road scheme, in accordance with TAG. The Scheme results in an overall decrease in the number of accidents and casualties. However, this includes an increase in fatal casualties. In total, COBA-LT analysis indicates that, over a 60-year timeframe the Scheme improvements will save a total of 61 accidents but with an increase of 1 Killed or Seriously Injured casualty. As detailed in the Transport Assessment (**TR010066/APP/7.3**), a road safety audit has been undertaken on the preliminary design by a third party. Recommendations arising from these audits have been considered by the design team and incorporated into the design where appropriate. An audit is carried out at four stages in the development of highways schemes starting with the completion of the

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		preliminary design (stage 1 RSA), the completion of the final design (stage 2 RSA), at completion of construction (stage 3 RSA) and 12-months post-opening of the operation of the Scheme (stage 4 RSA). The role of the auditors is to identify aspects of the engineering interventions that could give rise to road safety problems and to propose changes to the design or other mitigation measures. The RSA is carried out by auditors with experience of collision data analysis, road safety engineering experience and an understanding of highways design principles such as design requirements and best practice.
4.59	The applicant should be able to demonstrate that their scheme is consistent with the government's Road Safety Policy and with the National Highways Safety Framework. Applicants must show that they have taken steps that are reasonably required to minimise the risk of death and injury arising from their development including: • contributing to the overall reduction in road casualties. • contributing to the overall reduction in the number of unplanned incidents. • contributing to improvements in road safety for pedestrians and cyclists.	See response to NPS NN paragraph 4.57. The Scheme has prioritised safety in design and is modelled to decrease the overall number of accidents on the road network (although a small shift towards a higher severity is seen), from by creating a high-quality dual carriageway, with the provision of new cycling and walking infrastructure, providing safety improvements for walkers, cyclists and vulnerable users. The findings from the WCH surveys show that there are a notable number of unaccompanied minors crossing the B4082 near Clifford Bridge Road roundabout. Timings of these movements coincide with school hours. The existing crossing point that is used is an uncontrolled crossing to an island. The Scheme will provide a new signalised pedestrian crossing at this location to provide a safe crossing point on B4082. The Scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the national Strategic Framework for Road Safety. Requirements for safety risk assessment (GG104) - GG 104 sets out the framework for managing safety risks for customers, workers or other parties. - Throughout the Scheme design development, the design has been assessed in line with DMRB GG104 - The safety assessment aids designers to review the design for customers, workers and other parties to influence how the design can be made safer - These assessments and actions taken improve the safety of the Scheme development stages (construction and end use) See section 3.3 and 7.3.8 of the Scheme Design Report (**TR010066/APP/7.4**).

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		Further details on the accident analysis and forecast Scheme benefits are included in Section 4 of the Case for the Scheme (**TR010066/APP/7.1**) and in the Transport Assessment (**TR010066/APP/7.3**).
4.60	The applicant must also demonstrate that: • they have considered the safety implications of their project from the outset • they are putting in place rigorous processes for monitoring and evaluating safety	Safety has been taken into account through the consideration of alternatives, and the design evolution of the Scheme as illustrated throughout Section **3** of the Case for the Scheme (**TR010066/APP/7.1**). How the design principles have been applied to the Scheme are shown in Table 4-1 of the Scheme Design Report (**TR010066/APP/7.4**), this includes: "Good road design makes roads safe and useful" - The existing at-grade Walsgrave Junction is operating at over capacity and experiences congestion. Feedback from statutory consultation held between October and December 2023 highlighted that it is difficult to access the roundabout from the B4082 due to congestion and the speed of traffic accelerating through the junction on the A46. This would reinforce the evidence that the majority of collisions recorded within the Scheme area are located at the existing roundabout. The Scheme will deliver a grade separated junction to the north of the existing Walsgrave roundabout. The B4082 will be extended to the new dumbbell arrangement with slip roads providing access to and egress off the A46. The new junction arrangement will provide improved safety for traffic wanting to leave or join the new A46 and remove the congestion generated by the at-grade roundabout. The OTMP (**TR010066/APP/7.5**) refers to ongoing safety and monitoring during construction. Please refer to the response to NPS NN paragraph 4.58 with regards to the RSA, which effectively looks at monitoring and evaluating safety.
4.61	The Secretary of State should not grant development consent unless satisfied all reasonable steps have been taken and will be taken to: • minimise the risk of road casualties arising from the scheme.	See the response to NPS NN paragraph 4.57.

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	• contribute to improvements in the safety of the strategic road network.	
Security considerations		
4.67	Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage of in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially critical infrastructure, there may be national security considerations.	No national security issues were identified in developing the Scheme and no issues were identified in the responses to the statutory consultation held between October and December 2023 (see the Consultation Report (**TR010066/APP/5.1**) and Annex M of the Consultation Report (**TR010066/APP/5.2**)). There was therefore no requirement to consult security experts at the Centre for the Protection of National Infrastructure or Department for Transport.
4.68	Where national security implications have been identified, the applicant should consult with the Department for Transport, and where necessary the National Protective Security Agency to ensure that security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. For some, this is a legal requirement as per section 119 of the Railways Act 1993. If the Department for Transport (or where appropriate) the National Protective Security Agency are satisfied that security issues have been adequately addressed in the project when the application is submitted to the Secretary of State, the relevant body will provide confirmation of this to the Secretary of State. The Secretary of State should not need to give further consideration to the details of the security measures in its examination.	See the response to NPS NN paragraph 4.67.
4.69	The applicant should only include sufficient information in the application as is necessary to enable the Examining Authority and the Secretary of State to examine the development consent issues and make a properly informed recommendation on the application.	See the response to NPS NN paragraph 4.67.
Health		
4.72	As described in the relevant sections of the NPS, where the proposed project has an effect on human beings, the applicant should assess these effects, identifying any potential adverse health impacts, and identify measures to avoid, mitigate or as a last resort	The Scheme has been subject to EIA, which has considered air quality and noise impacts on human receptors (including local communities, walkers and cyclists). ES Chapter 5 (Air Quality), ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**), and ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) report the

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	compensate for adverse health impacts as appropriate. Enhancement opportunities should be identified by promoting local improvements for active travel and horse riders driven by the principles of good design to create safe and attractive routes to encourage health and wellbeing; this includes potential impacts on vulnerable groups within society i.e. those groups within society which may be differently impacted by a development compared with the wider society as a whole.	impacts and propose appropriate mitigation for the effects of the Scheme's construction and operation on the following human health determinants and health outcomes: • Access to community, recreation and education facilitates • Access to green/ open space • Access to healthcare facilities • Outline spatial characteristics of the transport network and usage in the area including the surrounding road network, public rights of way (PRoW), cycle ways, non-designated public routes and public transport routes) • Existing and predicted levels of air and noise pollution • Existing and predicted levels of noise disturbance • Landscape amenity • Sources and pathways of potential pollution (e.g., land/ water contamination) • Safety. The Scheme has prioritised safety in design to decrease the overall number of accidents on the road network (although a small shift towards a higher severity is seen) from by creating a high-quality dual carriageway, with the provision of new cycling and walking infrastructure, providing safety improvements for walkers, cyclists and vulnerable users. It is considered that these will bring potentially significant beneficial health outcomes There is the potential for both adverse and beneficial human health outcomes due to changes to amenity (arising from a combination of noise, air quality, visual, and traffic effects) as a result of the operation of the Scheme. However, as outlined in ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) overall, impacts on population and human health are predominately not significant once the Scheme is operational. Potential impacts of the Scheme during construction include disruption to accessing private property and housing, community land and assets and development land and businesses due to road closures and construction traffic, and disruption to WCH route use. A Construction Traffic Management Plan (CTMP) will be in place to

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		mitigate construction traffic and road closure related impacts. An OTMP is submitted as part of the application (**TR010066/APP/7.5**). At present only the R75x bridleway from Farber Road to Walsgrave Hill Farm (via the Farber Road overbridge) provides WCH facilities within the Order Limits. No works are proposed to this bridge. Operation of the Scheme would not result in any impacts on any existing WCH facilities, and the Scheme would not lead to any changes to the existing local WCH network. For WCH users, there would be beneficial impacts during operation. The new signalised pedestrian crossing facility on the eastern arm of the Clifford Bridge Round roundabout would provide safety benefits facilitating north to south movement across the B4082, resulting in a beneficial effect. Incorporating mitigation outlined in ES Chapter 5 (Air Quality), ES Chapter 7 (Landscape and Visual Effects), ES Chapter 9 (Geology and Soils), ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**), health outcomes are deemed to be Neutral and Positive during construction and operation, aside from effects due to construction noise and construction traffic which may result in temporary significant effects and therefore a Negative health outcome for some receptors.
Accessibility		
4.74	The government's strategy for achieving equal access for disabled people is set out in the Inclusive Transport Strategy. The government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering schemes that take account of the accessibility requirements of all those who use, or affected by, national networks infrastructure, including disabled users.	The Highways England (now National Highways) design standards and Scheme specific details are compliant with current national legislation set out under the Equality Act 2010 and associated Public Sector Equality Duty (PSED). It supports National Highways in meeting its statutory requirements to support good decision making and to ensure that the Scheme meets the needs of all users of the road network and of local communities, in particular those groups covered under the Equality Act 2010. An Equality Impact Assessment (**TR010066/APP7.6**) has been undertaken and provides an analysis of the proposals for the A46 Coventry Junctions (Walsgrave) Scheme. The Equality, Diversity and Inclusion Tool (EDIT) tool was used to identify areas with high densities of population, protected characteristic groups, and travel destinations in the Scheme area, providing an understanding of the extent of various aspects of how the Scheme might affect equality groups. The assessment

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		concludes that the Scheme would have no significant impact on people within the protected characteristic groups. ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) considers the effects of the Scheme on accessibility including vulnerable road users. With WCH, minimising the impacts of the Scheme on WCH is an integral part of Scheme design and this has been achieved by maintaining connectivity and incorporating new facilities to enhance existing networks. The Scheme would improve strategic and local connectivity in Coventry and the wider area provides opportunities for future WCH routes to come forward as outlined in ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**). With regards to WCH provision, the Scheme incorporates enabling works for future WCH provision to be provided by others. This includes additional earth works which provides verge widening along the new section of the B4082 link road to accommodate the future provision of a segregated walking and cycling route and a section of shared use path by others. The Applicant has also retained the Hungerley Hall Farm accommodation bridge and will continue to maintain the asset. These enabling works have the potential to facilitate a new route from Clifford Bridge Road and the Binley Cycleway (to be delivered by Coventry City Council) to Coombe Abbey Park in the future, at a substantially reduced cost and disruption. Such a route would connect with committed and proposed future active travel schemes within Coventry and Warwickshire local authority areas. The Scheme would include the provision of a new signalised pedestrian crossing facility on the eastern arm of the Clifford Bridge Road roundabout to facilitate safe north to south movements across the B4082. Although the journey length for users would be unchanged, the improved amenity and potential road safety benefits of providing the crossing would result in a slight beneficial effect.
4.75	Applicants must comply with any obligations under the Equality Act 2010. Public Authority applicants are reminded of their duty to promote equality and to consider the needs of disabled people as part of their normal practice. The Public Sector Equality Duty requires that public authorities have due regard to the need to:	See the response to NPS NN paragraph 4.74. The statutory pre-application consultation took place with prescribed consultees, people with land interests, local authorities, members of the public and other relevant consultees identified by the project team. In particular consultees identified that may represent those with identified protected characteristics include the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act. • advance equality of opportunity between people who share a protected characteristic and people who do not share it. • foster good relations between people who share a protected characteristic and people who do not share it.	Equality and Human Rights Commission and The Disabled Persons Transport Advisory Committee. A variety of methods of engagement were used to gain feedback from stakeholders. A brochure and questionnaire were used to inform people of the scheme proposals, provide a map of constraints around the local area and provide contact details for National Highways. The consultation periods were advertised on the National Highways website and a press notice was issued in advance of the statutory consultation. National Highways wrote to all prescribed consultees, local authorities and persons with interest in the land including a hard copy of the consultation brochure Information was provided through a consultation brochure that was made available on the consultation website, at public information events and at public information points. Public consultation events were held, and publications and news releases made in the media. The venues were selected with the aim of providing the optimum opportunity for members of the public across the area to attend, as well as offering the most suitable facilities locally to hold such an exhibition. The scheme proposals were presented on display boards with drawings and descriptive text. A fly-through video was also produced illustrating the scheme and included a visual description. See the Consultation Report (**TR010066/APP/5.1**) and Appendices (**TR010066/APP/5.1**) for further details.
4.76	All applicants are also reminded that the Secretary of State must have regard to the Public Sector Equality Duty when exercising their functions.	See the response to NPS NN paragraph 4.74 and 4.75.
4.77	As set out in paragraphs 4.5 to 4.6, applicants for road and rail projects (excluding SRFIs) will normally be supported by a business case prepared in accordance with the Transport Business Case guidance. This includes distributional analysis which can include information relevant to the Equality Act public sector equality duty.	See the response to NPS NN paragraphs 4.5 and 4.6. The Applicant has considered the public sector equality duty in preparing the business case for the Scheme, which is summarised in the Economic Assessment section (Section 5) of the Case for the Scheme (**TR010066/APP/7.1**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
4.78	Applicants should demonstrate the following where relevant: • all reasonable opportunities to deliver improvements in accessibility on and to the existing national road network, should be taken, including improvements for non-motorised users. • severance can be a problem in some locations, where appropriate, applicants should seek to deliver improvements that reduce community severance and improve accessibility. • national networks infrastructure should incorporate good design (which is inclusive by default), as expanded on in paragraphs 4.27 to 4.32 which includes delivering accessible infrastructure for users.	**Accessibility** See the response to NPS NN paragraph 4.74. ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) reports on the potential impacts of the Scheme on the following sub-topics of land-use and accessibility: • private property and housing • community land and assets • development land and businesses • agricultural land holdings • WCH The assessment has focused on those impacts that are likely to have significant effects on accessibility, in accordance with the DMRB LA 112. The design, mitigation and enhancement measures that would be provided as part of the Scheme are described in Section 12.10 of ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) and shown in ES Figure 12.3 (Design mitigation and enhancement measures) (**TR010066/APP/6.2**). Appropriate mitigation measures will be implemented through the First Iteration EMP (**TR010066/APP/6.5**) in accordance with DMRB LA 120 to mitigate air quality, noise, traffic and visual effects and measures will be included in the REAC within Appendix A of the First Iteration EMP (**TR010066/APP/6.5**). The Scheme has the potential to improve safety and to support the smooth flow of traffic on the A46, with potentially significant beneficial effects in supporting the future economic growth aspirations of the region. It will improve provisions for WCH; the Scheme includes the provision of a controlled crossing on the eastern arm of the Clifford Bridge Road roundabout to facilitate the safe movement of pedestrians across the B4082 link road, including children walking to school from the nearby residential areas. This will assist in connecting the communities of Binley and Wyken, and is an improvement over the existing uncontrolled crossing point on the B4082.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Severance The existing A46 experiences congestion during peak hours, creating a degree of severance and accessibility issues for local communities. The Scheme has been designed to manage the impacts of severance it may cause and relieve existing severance issues where possible. ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) describes the assessment of severance in terms of separation of communities from assets and areas of community land, alterations to private properties (including their access) and severance of walker, cyclist and horse-rider routes. Again, the new signal-controlled pedestrian crossing on the B4082 controlled crossing will facilitate safe north to south crossing movements of the B4082. The lack of any controlled crossing of the B4082 causes severance between the Wyken and Binley communities, especially during the peak AM and PM period. There are also beneficial impacts from the scheme on severance due to reduced journey time and access to Hungerley Hall Farm. **Good Design** See response to NPS NN paragraphs 4.27 to 4.32 relating to good design.
Road Tolling		
4.79	The government will continue to consider tolling as a means of funding new river and estuarial crossings, especially in locations where a similar route is already tolled.	No new road tolling is proposed as part of the Scheme.

Table 2: Chapter 5 – Generic Impacts

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Air quality and emissions		
Applicant's assessment		
5.12	The applicant should undertake an assessment as part of their Development Consent Order application where the impacts of the project (both on and off-scheme) are likely to have significant air quality effects in relation to meeting environmental assessment requirements or affect the UK's ability to comply with the Air Quality Standards Regulations 2010, or impact the relevant local authority's ability to comply with the Air Quality (England) Regulations 2000. Applicants should also refer to the Environmental Assessment section in chapter 4 and paragraph 5,4	ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) accords with the requirements of NPS NN paragraphs 5.12 to 5.14. This assessment has reviewed the potential impacts of the Scheme on local air quality with reference throughout to the AQOs defined by the relevant national legislation, including the Air Quality Standards Regulations 2010 and the Air Quality (England) Regulations 2000. This is presented in section 5.9 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**). The existing air quality levels and future baseline has been assessed, in addition to the future air quality if the Scheme did not proceed. The detailed modelling also utilises Defra projections of air quality which allow for the effects of government initiatives to reduce emissions from motor vehicles and other sources. The detailed modelling reports are presented in ES Appendices 5.1 – 5.3 (**TR010066/APP/6.3**). The results of the air quality assessment (Sections 5.9 of ES Chapter 5 onwards) conclude that there will be no significant effects on air quality at either the construction or operational stage of the Scheme: With the implementation of the First Iteration EMP (**TR010066/APP/6.5**) dust mitigation measures, there would be no residual significant air quality effect during the construction phase of the Scheme. No mitigation specific to air quality is required for the operation phase. The Scheme will have no significant residual effects on local air quality and will not affect the UK's ability to comply with Air Quality Standards Regulations 2010.
5.13	The assessment should describe: • existing air quality emissions and concentrations • forecasts of emissions and concentrations at the time of opening, assuming that the scheme is not built (the future baseline) and taking account the impact of the scheme	See response to NPS NN paragraph 5.12. This assessment in ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) has reviewed existing and future baseline air quality within the defined study area and has considered air quality impacts associated with both the construction

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• any significant air quality effects, their mitigation and any residual effects distinguishing between the construction and operation stages and taking account of the impact of any road traffic generated by the project • the predicted emissions, concentration change and absolute concentrations of the proposed project after mitigation methods have been applied • any potential impacts on nearby designated habitats from air pollutants • the proximity and nature of nearby receptors which could be impacted, including those more sensitive to poor air quality.	and operation phases of the Scheme. Where appropriate, mitigation is detailed and the residual effects stated. The assessment has addressed impacts at local sensitive receptors (including nearby habitats), within the context of relevant AQOs and limit values. This is presented in sections 5.8, 5.9 and 5.10 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**). Impact upon designated habitats from air pollutants are also presented in ES Appendix 8.15 (Assessment of Air Quality Impacts on Ecological Features) (**TR010066/APP/6.3**).
5.14	In addition, applicants should consider The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 by following available Defra guidance, including interim guidance.	See response to NPS NN paragraph 5.20 The Environmental Targets have been considered for the assessment in ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**). Detailed assessment is included in the ES Figures 5.1 – 5.11c (**TR010066/APP/6.2**). The assessment in ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) has reviewed the potential impacts of the Scheme on local air quality with reference throughout to the AQOs defined by the relevant national legislation, including The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. This is presented in section 5.9 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**).
5.15	Defra publishes future projections of UK air pollutant emissions based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. The applicant's assessment should be consistent with this approach but may include more detailed modelling to demonstrate local impacts. If an applicant believes they have robust additional supporting evidence, such as updated vehicle fleet data, that has been incorporated into the Emissions Factor Toolkit and is likely to change the projected emissions, they should include this in their representation to the Examining Authority along with the source of evidence.	See response to NPS NN paragraph 5.12. ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) shows that the air quality assessment was undertaken using the Atmospheric Dispersion Modelling System for Roads (ADMS-Roads) software (version 5.0.0.1) and the relevant Defra and National Highway's tools, as outlined herein. Further information describing the modelling parameters used are presented in ES Appendix 5.1 (Air Quality Modelling Process) (**TR010066/APP/6.3**). The methodology for the assessment has not deviated from the standard tools as recommended by Defra as presented in Section 5.5 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Mitigation		
5.17	Mitigation measures may affect the project design, layout, construction, operation and / or may consist of measures to improve air quality beyond the immediate locality of the scheme. Measures could include, but are not limited to, changes to the route or design of the new scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to better disperse emissions, and/or speed control.	See response to NPS NN paragraph 5.12. Mitigation measures are presented in Section 5.10 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**).
5.18	Where a project is likely to lead to a breach of any relevant statutory air quality objectives or targets, the applicant should work with the relevant authorities to secure appropriate mitigation measures. Where a project is located within, or in close proximity to, an Air Quality Management Area or Clean Air Zone, applicants should engage with the relevant local authority to ensure the project is compatible with the Local Air Quality Action Plan.	See response to NPS NN paragraph 5.12. ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) shows the Scheme does not lead to a breach of any relevant statutory air quality objectives or targets. Coventry City Council currently has a citywide Air Quality Monitoring Area (AQMA), declared due to exceedances of the annual mean nitrogen dioxide (NO_2) objective, the boundary of which is immediately adjacent to the Scheme Order Limits. As such, a number of road links within the study area are located within the AQMA. The majority of receptors within the Coventry AQMA experience either an improvement or an imperceptible change in concentrations. Five of the six receptors predicted to experience a worsening in annual mean NO_2 concentrations are located within the AQMA. As outlined in ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) Coventry City Council were consulted on the Environmental Scoping Report and approved the methodology for the air quality assessment. The assessment has followed DMRB LA 105 and has considered the proximity to the AQMA in determined a Detailed Assessment was needed. There were no predicted exceedances of the NO2 annual mean objective within the AQMA (Section 5.9 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**)). Mitigation measures appropriate to the predicted level of impact have been recommended in Section 5 ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**). Appropriate mitigation measures, including

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		an Outline Air Quality and Dust Management Plan, have been recommended in Section 5.10 ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**).
5.19	With respect to all relevant statutory air quality limits, objectives and targets other than those set out under The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, all reasonable mitigation action should be taken. At a minimum, all proposed mitigation measures should ensure that the net impact of a project does not delay compliance with those objectives.	See response to NPS NN paragraph 5.12 and 5.20. This assessment has reviewed the potential impacts of the Scheme on local air quality with reference throughout to the AQOs defined by the relevant national legislation, including the Air Quality Standards Regulations 2010 and the Air Quality (England) Regulations 2000. This is presented in section 5.9 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**).
5.20	With respect to The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, the applicant should take all reasonable steps to reduce the emissions of PM2.5, and its precursor pollutants in the construction and operational stages of the development by following available Defra guidance.	See response to NPS NN paragraph 5.12. ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) follows the approach in DMRB LA 105 which states that there is no need to model PM2.5 as the UK currently meets its legal requirements for the achievement of the PM2.5 air quality annual mean limit value (20 µg/m3). Whilst the government has set two new legally binding targets to reduce concentrations of PM2.5, the planning reforms required to facilitate the implementation of the new targets into decision-making have not been published at the time of undertaking the assessment. The closest Defra's Automatic Urban and Rural Network (AURN) monitoring sites to the Scheme already meet the 2040 PM2.5 annual mean concentration target (Defra, 2024). The nearest AURN site that exceeds the target (10 µg/m3) in 2022 is Northampton Spring Park. However, this site is located approximately 40 km from the Scheme and therefore not representative of local conditions due to this distance. However, the study does consider both PM10 and PM2.5 as set out in Section 5.5 of ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**). The baseline concentrations are well below current standards for both metrics and therefore there is no risk to these limits being breached as a result of the Scheme). Therefore, the air quality assessment has adhered to DMRB LA 105 and PM2.5 has not been assessed further.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.21	Where a scheme is expected to lead to a deterioration of air quality the applicant should justify why the level of mitigation proposed is deemed to be reasonable.	See response to NPS NN paragraph 5.12 and 5.18.
Decision-making		
5.22	In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. The Secretary of State should consider the mitigation measures put forward by the applicant are acceptable. In doing so, the Secretary of State should have regard to relevant guidance including the Air Quality Strategy or any successor to it, Local Air Quality Management guidance and any relevant PM2.5 target guidance.	See response to NPS NN paragraph 5.12, 5.18 and 5.19.
5.23	Air quality considerations are likely to be particularly relevant where schemes are proposed: • within or adjacent to Air Quality Management Areas; roads identified as being above Limit Values; and • where changes are sufficient to bring about the need for a new Air Quality Management Area or change the size of an existing Air Quality Management Area; or bring about changes to the exceedances of the Limit Values	See response to NPS NN paragraph 5.12 and 5.18.
5.24	The Secretary of State should give air quality considerations substantial weight after taking into account mitigation, a project would lead to a significant air quality impact in relation to meeting environmental assessment requirements; or where they would lead to a deterioration in air quality in a zone/agglomeration.	See response to NPS NN paragraph 5.12. The outcome of the assessment in ES Chapter 5 (Air Quality) (**TR010066/APP/6.1**) has shown there to be no likely significant air quality effect.
5.25	The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts resulting from the proposed scheme will either: • result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Standards Regulations (2010) becoming non-compliant; or	See response to NPS NN paragraph 5.12.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• affect the ability of a non-compliant area to achieve compliance with the most recent published timescales reported to the Examining Authority at the time of examination.	
Greenhouse Gas emissions		
Applicant's assessment		
5.31	Emissions occur across the lifecycle of a project, and assessing the Whole Life Carbon emissions throughout a project will identify areas for efficiency and potential carbon reductions. All proposals for national networks infrastructure projects should include a Whole Life Carbon Assessment at critical stages of the project lifecycle, for example the submission of a major business case.	A Whole Life Carbon Assessment has been undertaken as part of the EIA and is presented in ES Chapter 14 (Climate) (**TR010066/APP/6.1**) which reports the total estimated greenhouse gas emissions arising from the Scheme for the construction, operation and overall total for the whole lifecycle. The Whole Life Carbon Assessment has been conducted according to PAS 2080:2023 and DMRB LA 114 as outlined in the methodology and the results of the assessment have been reported in ES Chapter 14 (Climate) (**TR010066/APP/6.1**). An Outline Carbon Management Plan has been produced for the Scheme, Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**) which outlines different mitigation measures to minimise the carbon emissions from construction and operation.
5.32	Undertaking a Whole Life Carbon Assessment involves calculating the emissions from "cradle to grave" of a project. This builds a comprehensive understanding of the emissions generated when building, operating, using, maintaining and discontinuing the infrastructure.	See response to NPS NN paragraph 5.31. Decommissioning is included in ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**) section 4.3. where it has been scoped out. The Planning Inspectorate agreed that impacts from decommissioning are scoped out on the basis that the Scheme will be in use beyond the design life of the road infrastructure, and that any future decommissioning is unlikely and would require an additional planning submission. As set out in ES Chapter 14 (Climate) (**TR010066/APP/6.1**) as per paragraph 2.3 of DMRB LA 114, GHG emissions associated with decommissioning of the Scheme (i.e. modules C1 to C4 of the 'end of life' life cycle stage identified in PAS 2080:2023) are excluded from the assessment due to the length of the operational phase of the Scheme's assets (which is assumed to be greater than the 60-year appraisal period required by DMRB LA 114).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		As such, decommissioning has not been considered and is scoped out of the ES.
5.33	A Whole Life Carbon Assessment should be conducted according to the guidance, standards and methodology set out in the Transport Analysis Guidance Unti A.3. Also refer to the Environmental Assessment at paragraph 4.12 of this NPS document for more information about the cumulative assessment.	See the response to NPS NN paragraphs 4.12 and 5.31. A Whole Life Carbon Assessment has been undertaken which reports the total estimated greenhouse gas emissions arising from the Scheme for the construction, operation and overall total for the whole lifecycle. The Whole Life Carbon Assessment has been conducted according to PAS 2080:2023 and DMRB LA 114 as outlined in the methodology and the results of the assessment have been reported ES Chapter 14 (Climate) (**TR010066/APP/6.1**). This includes the use of Web-based Transport Analysis Guidance (WebTAG) and the TAG database.
5.34	As referenced in the Transport Analysis Guidance, the guiding principles of managing whole life carbon are established in PAS 2080: Carbon Management in Buildings and Infrastructure (2023). This demonstrates how the whole value chain can support infrastructure decarbonisation.	See the response to NPS NN paragraph 5.31 and 5.33.
5.35	Having regard to current knowledge, a carbon management plan should be produced as part of the Development Consent Order submission and include: • a Whole Life Carbon Assessment for the project • an explanation of the steps that have been taken to drive down the carbon impacts of the project • how construction and operational emissions and, where applicable, emissions from maintenance activities, have been reduced as much as possible using the carbon reduction hierarchy (e.g. as set out in PAS 2080) (recognising that the case of road projects while the developer can estimate the likely emissions from road traffic, it is not solely responsible for controlling them). • whether and how any residual emissions will be (voluntarily) offset or removed using a recognised framework (any offsetting of emissions should not be used in the Whole Life Carbon Assessment headline figures)	See the response to NPS NN paragraph 5.31 and 5.33. An Outline Carbon Management Plan, Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**), has been produced for the Scheme and ES Chapter 14 (Climate) (**TR010066/APP/6.1**). Section 14.10 outlines different mitigation measures to minimise the carbon emissions from construction and operation. The Outline Carbon Management Plan Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**) will be developed into a Carbon Management Report will be prepared at the end of each work stage and follow National Highways guidance. This will include opportunities are to include the possible embedment of nature-based solutions and technological solutions to mitigate, capture or offset the emissions of construction (e.g. through sustainable drainage systems (SuDs), woodland creation or low carbon technology). A Carbon Management Report is a requirement of the Section Iteration EMP as secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• where there are residual emissions, the level of emissions and the impact of those on relevant statutory carbon budgets.	
Mitigation		
5.36	Applicants should look for opportunities within the design of the proposed development to embed nature-based or technological solutions to mitigate, capture or offset the emissions of construction.	See response to NPS NN paragraph 4.35 and 5.31. The impacts of the construction and operation of the Scheme have been discussed in ES Chapter 14 (Climate) (**TR010066/APP/6.1**) and mitigation measures proposed to reduce the impact of construction (see Section 14.10 of the Chapter). The Outline Carbon Management Plan, Appendix B.8 of the First Iteration EMP (**TR010066/APP/6.5**), says that nature-based solutions will be considered. Nature-based solutions are presented on the Environmental Masterplan (ES Figure 2.4 (**TR010066/APP/6.2**)). The Environmental Masterplan has been developed with ecologists to increase biodiversity, including the provision of sustainable drainage systems and woodland creation. Refer to ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**). The mitigation presented on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) includes creation of habitat including scrub, grassland, woodland and three drainage basins two of which would be designed to be permanently wet and planted with aquatic species, representing nature-based solutions incorporated into the sustainable urban drainage (SUDs). This is also discussed in section 13.10 of ES Chapter 13 (Road Drainage and the Water Environment (**TR010066/APP/6.1**) and set out in the drainage strategy (ES Appendix 13.6 (**TR010066/APP/6.3**)).
5.37	Steps taken to minimise, capture and offset emissions in design and construction, should be set out in the carbon management plan, secured under the Development Consent Order. This could include, for example, mitigation through woodland creation on or adjacent to the site contributing to offsetting residual emissions. Applicants may wish to refer to the Institute of Environmental Management and Assessment	See response to NPS NN paragraph 4.35, 5.31 and 5.32. As outlined in the Scheme Design Report (**TR010066/APP/7.4**) (Table 4-1), a key aspect of the NPS NN Design Principles is sustainable development. The Scheme includes opportunities to enable carbonisation, incorporates flexibility, and builds resilience against climate change. The functionality of projects, including fitness for purpose, resilience and sustainability, is equally important

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	Greenhouse Gas Management Hierarchy guidance when drafting their application.	and has been incorporated into the Scheme planting design which uses native planting species which are potentially suited to our changing climate (wetter winters and dry summers) i.e. more wet and dry tolerant species for long term climate change resistance. As well at detailed design reviewing alternative species in terms of non-native/ cultivars. The proposed environmental design planting strategy takes reference from the native plant species found in the surrounding area. Species include oak, birch, hawthorn and field maple. The inclusion of diversity within planting mixes will embed an aspect of resilience and adaptation for vegetation faced with increasing pest, disease and climate change threats.
Decision-making		
5.38	The Secretary of State must be satisfied that the applicant has as far as possible assessed carbon emissions at all stages of the development. The Secretary of State for Energy and Net Zero regularly assesses whether the UK has sufficient policies and proposals overall to meet the UK carbon budgets, with a view to meeting the net zero target, in line with the duties under Section 13 of the Climate Change Act 2008. It would not be feasible or sensible for such an assessment to be done at the time of taking individual development decisions, and there is no legal requirement to do so.	See response to NPS NN paragraph 4.35 and 5.31.
5.39	S.1(1) of the Climate Change Act 2008 reflects and puts into effect the net zero target set in light of the temperature goal of the Paris Agreement. The target was increased from 80% emission reductions by 2050 to 100% emission reductions by 2050 in June 2019. Carbon budgets 1 to 5 were set to meet the 80% emission reduction target, but carbon budget 6 (2033-2037) has been set to meet the 2050 net zero target, so it is more stretching. The UK's current Nationally Determined Contribution (set in line with Article 4 of the Paris Agreement) commits to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels, so it is more stretching than carbon budget 5. The UK's Nationally Determined Contribution is on the pathway to the 2050 net zero target. Where it provides useful context, applicants may wish to compare their scheme emissions against carbon budgets, next zero and the Nationally Determined Contribution. Where an	See response to NPS NN paragraph 4.35 and 5.31. ES Chapter 14 (Climate) (**TR010066/APP/6.1**) shows the increase in carbon emissions resulting from the Scheme represents up to approximately 0.003% of relevant carbon budgets over their respective periods. Comparison between the increase in the Scheme emissions and published carbon budgets, following DMRB LA 114 standard on determining significance, can only be undertaken for approximately 19% of the emissions increase. The remaining 81% of the increase in carbon emissions will occur after 2038 (the end of the last currently published UK carbon budget) however, there is the commitment to meet the Climate Change Act (2050 Target amendment) target of net zero emissions by 2050. It is expected that the remaining 81% of the increase in carbon emissions will be reduced due to the uptake of electric

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	applicant assesses the carbon impacts of its scheme against carbon budget 6, and later carbon budgets, it is to be taken also to have assessed the scheme against the net zero target in the Climate Change Act 2008, as they are line with this target.	vehicles, with a further opportunity of increased use and improved public transport in the area. However, there is currently too much uncertainty to model these opportunities. For both construction and operational effects on climate, it is unlikely that the Scheme will result in greenhouse gas emissions that would be defined as significant considering the greenhouse gas emissions from the Scheme are unlikely to have a material impact on the Government achieving its carbon targets. For operational road user greenhouse gas emissions, the study area consists of the affected road network defined for road user carbon (vehicle emissions) in DMRB LA 105 Air Quality, which was derived from the transport model referred to in the Transport Assessment (**TR010066/APP/7.3**) and based upon the traffic data derived from this model. The parameters of this model are detailed within Section 4 of the Transport Assessment (**TR010066/APP/7.3**). In addition, the TAG assessment uses the future projections of vehicle fuel efficiency and split of vehicles by fuel type detailed in the TAG data book including electric vehicles.
5.40	The Secretary of State should be content that the applicant has taken all reasonable steps to reduce carbon emissions at all stages of the development. The Secretary of State should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and within the proposed development. However, given the important role national network infrastructure plays in supporting the process of economy wide decarbonisation, the Secretary of State accepts that there are likely to be some residual emissions from construction of national network infrastructure.	See response to NPS NN paragraphs 4.35, 5.31 and 5.36.
5.41	Operational carbon emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that net increase in operational carbon emissions is not, in itself, reasons to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework.	See response to NPS NN paragraphs 4.35, 5.31 and 5.36. ES Chapter 14 (Climate) (**TR010066/APP/6.1**) demonstrates the construction, operation and use of the Scheme is predicted to increase carbon emissions by approximately 377,791 tCO_2e over the appraisal period of 60 years (up to 2087). However, the contributions of the Scheme to the UK's carbon budget

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		for the relevant carbon budget periods are not significant, less than 0.003%, and therefore it can be concluded that the GHG emissions impact of the Scheme would not have any material impact on the UK Government meeting its legally binding carbon reduction targets.
5.42	Any carbon assessment will include an assessment of operational greenhouse gas emissions, but the policies set out in chapter 2 of the NPS, apply to these emissions. Operational emissions will be addressed in a managed, economy wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero. However, where the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of government to achieve its statutory carbon budgets, the Secretary of State should refuse consent.	See response to NPS NN paragraphs 4.35, 5.31, 5.36 and 5.37.
Biodiversity and nature conservation		
Applicant's assessment		
5.46	The applicant should consider the potential direct and indirect impacts on ecosystems (including the impacts on habitats and protected species) and the interactions between these, and provide environmental information proportionate to the likely impacts of the infrastructure on biodiversity and nature.	ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) assesses the predicted effects on biodiversity including internationally, nationally and locally designated sites and other habitats and protected species. The ES Chapter is supported by a series of technical appendices 8.1 – 8.16 (**TR010066/APP/6.3**). The ES chapter provides an assessment of the likely significant effects on biodiversity as a result of the Scheme. This assessment includes a review of the existing biodiversity baseline conditions, assessment of potential impacts and identification of proportionate mitigation to mitigate against any likely significant adverse effects on ecological features resulting from the Scheme.
5.47	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geographical conservation interests as well as consider how their proposal will deliver biodiversity net gain in line with the requirements in a Biodiversity Gain Statement as set out in paragraphs 4.23 to 4.26 above.	See the response to NPS NN paragraphs 4.23 to 4.26. Also see the response to NPS NN paragraph 5.46. Adverse impacts of the Scheme on ecological and geographical conservation interest would as a first measure be avoided where feasible (conserve).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) describes when enhancements to biodiversity interests are made as part of the Scheme. This includes habitat creation within Hungerley Hall Farm Ecosite, including sustainable drainage systems (SuDS), woodland, marsh and wet grassland, species-rich grassland, amenity grass, shrubs, ground cover and scrub in addition to planting of 612 individual trees. ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3**) presents the biodiversity net gain for the Scheme.
Mitigation		
5.48	To avoid direct and indirect harm or disturbance in line with the mitigation hierarchy the applicant should demonstrate: • developments are designed to avoid the risk of harm, for example by minimising the footprint of the development and/or retaining the site's important habitat features. • developments are designed and landscaped to provide green corridors and minimise habitat fragmentation (for example using underpasses or green bridges to link habitats). • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works. • during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species and habitats follow the mitigation hierarchy (including as a consequence of transport access arrangements). For example, plan for construction work to be carried out at specific times to avoid sensitive times and location, such as breeding season for wild birds and lifecycles for migratory fish.	See the response to NPS NN paragraph 5.46. 1. The Order Limits have been kept to a minimum by requiring only land that is necessary for delivering the Scheme elements and to provide safe working areas. 2. ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) shows that identification of mitigation measures has been in accordance with the mitigation hierarchy, to mitigate effects of the Scheme upon ecological features. Adverse impacts of the Scheme on ecological features would as a first measure be avoided where feasible, and where they cannot be avoided would be appropriately mitigated for. If required, compensation would be undertaken where significant residual effects upon ecological features exist after mitigation in accordance with DMRB LD 118. Compensation measures are not anticipated for the Scheme. Section 8.10 sets out the design, mitigation and enhancement measures of the Scheme. Mitigation measures have been designed to reduce and where possible avoid significant adverse effects upon, and avoid contraventions of law relating to, ecological features. The Environmental Masterplan (Figure 2.4 (**TR010066/APP/6.2**)) has been developed to connect new habitat creation with existing habitats, such a Coombe Pool SSSI. Fragmentation has been identified for the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		construction and operation phases and reported in section 8.9 (Potential impacts) of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**). Mitigation for fragmentation has been identified in section 8.10 (Design, mitigation and enhancement measures) which includes the provision of a badger crossing. All identified residual effects upon ecological features are assessed separately. The overall significance of residual effects for each ecological feature is taken as the adverse effect of the highest significance and is reported in Tables 8-19 and 8-20 of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) for the construction and operation phases respectively, and a summary is provided in Table 8-22. Where no adverse effects are reported, beneficial effects are reported as the overall effect before neutral effects as the latter can be considered to be no effect. 3. Temporary land has been kept to a minimum by using the existing Brinklow Road compound, and only providing a smaller satellite compound within the Order Limits. Furthermore, separate haul roads are not proposed with the Principal Contractor using the permanent corridors for works access. Refer to ES Figure 2.5 (Temporary Construction Features) (**TR010066/APP/6**.2). 4. The REAC Appendix A within the First Iteration EMP (**TR010066/APP/6.5**) sets out in detail mitigation measures required for each ecological feature for construction and operation of the Scheme. This includes best practice to ensure that risk of disturbance or damage to species and habitats, including limiting working hours and timings. For example, commitment BD5 Protection of breeding birds states that *"To avoid adverse impacts on breeding birds, habitat clearance should take place outside of the core breeding bird season (March to August inclusive)."*
5.49	If avoidance or reduction of harm is not possible, applicants should include appropriate mitigation measures, in line with the mitigation	See the responses to NPS NN paragraphs 5.46 and 5.48.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	hierarchy, as an integral part of the proposed development, including identifying where and how these will be secured in the long term.	
5.50	If avoidance or bespoke mitigation measures are insufficient or not possible, as a last resort, appropriate compensation measures should be sought and implemented.	See the responses to NPS NN paragraphs 5.46 and 5.48. As stated in the response to NPS NN paragraph 5.48, compensation measures are not anticipated for the Scheme.
5.51	The applicant should not just look to mitigate direct harms but should show how the project has taken advantage of opportunities to conserve and enhance biodiversity, having due regard to any relevant local nature recovery strategies and species conservation strategies. Opportunities will be taken to enhance, expand or connect existing habitats and create new habitats in accordance with biodiversity net gain requirements. Habitat creation, enhancement and management proposals should include measures for climate resilience, including appropriate species selection. Maintaining and improving habitat connectivity is important for climate resilience and the biodiversity of ecological networks.	See response to NPS NN paragraphs 5.46 and 5.48. At the time of writing this ES the Local Nature Recovery Strategies for Warwickshire and the West Midlands have not been published. Replacement planting is provided in the mitigation area as shown on the Environmental Masterplan ES Figure 2.4 (**TR010066/APP/6.2**) and detailed in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**). A triangular shaped area of land to the east of the A46 immediately north of Coombe Pool SSSI was identified at the options selection stage for compensatory planting, which is a type of mitigation involving the planting of new trees to directly replace those lost elsewhere within the Order Limits. The location has been chosen as it provides the greatest opportunity for habitat connectivity with the SSSI and associated woodland habitats, so is the most suitable location to replace the habitat types being replaced. Early discussions with Coventry City Council have been held to discuss this mitigation area being managed as part of the Coombe Abbey Park site. Having the mitigation area in this location would also enable any future WCH route across the Hungerley Hall Farm accommodation overbridge and access into the northern side of the existing Country Park to be facilitated. ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3**) details the BNG assessment undertaken for the Scheme. Any effect from climate change would be unlikely to significantly alter the land use, and therefore the habitats, prior to construction of the Scheme. Long term impacts from climate change could alter the species composition and types of habitats in and around the site, and therefore types and diversity of fauna.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		However, it is not anticipated that the combined impact of the Scheme and climate change would be any different to the impact of climate change in isolation (i.e. without the Scheme) as the habitats that would be created as part of mitigation proposals would be the same types as those found in the local area at the current time. As outlined in the Scheme Design Report (**TR010066/APP/7.4**) (Table 4-1), a key aspect of the NPS NN Design Principles is sustainable development. The Scheme includes opportunities to enable carbonisation, incorporates flexibility, and builds resilience against climate change. The functionality of projects, including fitness for purpose, resilience and sustainability, is equally important and has been incorporated into the Scheme planting design which uses native planting species which are potentially suited to our changing climate (wetter winters and dry summers) i.e. more wet and dry tolerant species for long term climate change resistance. As well at detailed design reviewing alternative species in terms of non-native/ cultivars. The proposed environmental design planting strategy takes reference from the native plant species found in the surrounding area. Species include oak, birch, hawthorn and field maple. The inclusion of diversity within planting mixes will embed an aspect of resilience and adaptation for vegetation faced with increasing pest, disease and climate change threats. Habitat connectivity along the Scheme would be achieved through the creation of native hedgerows and tree lines along the verges created as a vegetative screen and to maintain the local landscape character of the area as detailed in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**)). The Environmental Masterplan (Figure 2.4 (**TR010066/APP/6.2**)) has been developed with ecologists to connect new habitat creation with existing habitats, such a Coombe Pool SSSI. Other opportunities to maintain and improving habitat connectivity have been included as part of the Scheme, as set out in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**)) including: • Permanent and temporary working areas kept to a minimum to reduce habitat loss, with habitat temporarily lost to construction

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		works focused on lower quality habitats for biodiversity such as the arable land. • Habitat creation appropriate to those habitats lost whilst also providing more ecologically valuable habitat in some cases (for example in place of cereal crops) and composed primarily of native species and species recognised of being of higher benefit to pollinators and birds with regards to food sources. • Habitat creation along the verges of the Scheme and including species-rich grassland, woodland, scrub, native hedgerows with trees, wet grassland and tree planting. • Woodland planting to mitigate for loss of woodland due to the Scheme. • Habitat creation to mitigate for the impacts of habitat loss upon species including great-crested newt (GCN), breeding birds, wintering birds, bats, badger, common reptiles, hedgehog, brown hare and polecat. • Habitat connectivity along the Scheme achieved through the creation of native hedgerows and tree lines along the verges. • Provision of permanently wet drainage ponds to allow the enhancement of aquatic and terrestrial invertebrates, fish, amphibians and potentially otter, water vole and GCN should these species colonise. • Provision of a mammal (i.e. badger) crossing of the new B4082 link road and badger proof fencing to maintain the existing commuting route and restrict access to road carriageways.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• Retention of the existing Hungerley Hall Farm accommodation bridge maintains a commuting route for mammals and other species. • Designing lighting to best practice to reduce light spill and impacts on bats and other species. Further information about habitat creation is also provided ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**)).
5.52	Wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures in order to maximise multi-functional benefits whilst minimising land take. For example, this can be achieved through integration of biodiversity features within a sustainable drainage system; the use of green roofs and walls to harvest rainwater and ameliorate urban heating; or the restoration of rivers to reduce flood risk and provide attractive amenity areas.	See response to NPS NN paragraph 5.49. As stated in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), the habitat creation within Hungerley Hall Farm Ecosite, including SuDS, woodland, marsh and wet grassland, species-rich grassland, amenity grass, shrubs, ground cover and scrub in addition to planting of 612 individual trees will provide multi-functional benefits. Multifunctional benefits of proposed mitigation enhancement include: • Adverse impacts due to changes in water quality during the operational phase would be mitigated for by the drainage design, which includes proposed filter drains and three drainage features (SuDS), as detailed within ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**). Two of the proposed drainage features would be designed to be permanently wet ponds and planted with aquatic species. Given the absence of permanently wet aquatic habitat within the Order Limits, this is considered an enhancement for aquatic invertebrates, common amphibians and potentially otter, water vole and great crested newt should these species colonise whilst also providing water quality improvements. • The hedgerows and tree line creation along the verges offers habitat connectivity along but also seeks to maintain the local landscape character of the area (ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**)).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Decision-making		
5.53	The Secretary of State should consider the ten goals of the government's Environmental Improvement Plan, the United Nations Environmental Programme Convention on Biological Diversity of 1992 and any relevant measures and targets, such as the Environment Act 2021 targets. In doing so, the Secretary of State should also take account of the context of the challenge of climate change; failure to address this challenge will result in significant adverse impacts to biodiversity. The benefits of nationally significant low carbon transport infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh the harm to those interests. However, the mitigation hierarchy will still need to be applied.	See response to NPS NN paragraphs 5.46 and 5.48. Relevant legislation is considered in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) section 8.3. Mitigation for the Scheme is in accordance with the mitigation hierarchy and is detailed within section 8.10 of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), which also details enhancement measures. As a NSIP submitting a DCO application in late 2024 the Scheme is not subject to mandatory BNG under the Environment Act 2021. ES Appendix 8.1 (Biodiversity Net Gain Report) (**TR010066/APP/6.3**) details the BNG assessment undertaken for the Scheme and BNG is provided. Effects from climate change are discussed in paragraph 8.8.119 of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**). Any effect from climate change would be unlikely to significantly alter the land use, and therefore the habitats, prior to construction of the Scheme. Long term impacts from climate change could alter the species composition and types of habitats in and around the site, and therefore types and diversity of fauna. However, it is not anticipated that the combined impact of the Scheme and climate change would be any different to the impact of climate change in isolation (i.e. without the Scheme) as the habitats that would be created as part of mitigation proposals would be the same types as those found in the local area at the current time.
5.54	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, to ensure that any necessary mitigation and compensatory measures are secured, delivered, managed and if necessary enforced, and that biodiversity improvements are registered in accordance with biodiversity net gain requirements.	See the responses to NPS NN paragraphs 4.23 to 4.26. Also, the see responses to NPS NN paragraph 5.46 and 5.48. The draft DCO (**TR010066/APP/3.1**) includes the necessary, relevant, enforceable, precise and reasonable proposed Requirements which take into account guidance on the use of planning conditions. The Explanatory Memorandum (**TR010066/APP/3.2**) explains the purpose and effect of each provision in the draft DCO (**TR010066/APP/3.1**), including the requirements.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.55	As a general principle, and subject to the specific policies below, development should, at first avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. If avoidance is not possible, mitigation needs to be considered (as set out in paragraphs 5.48 to 5.52 above). Where significant harm cannot be avoided or mitigated it should be compensated for as a last resort, with on-site mitigation being considered prior to off-site. The Secretary of State will give significant weight to any residual harm.	As stated in ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**), the mitigation hierarchy from DMRB LA 104 paragraph 3.23 has been considered for all environmental impacts throughout the Scheme's lifecycle. The mitigation hierarchy is based on a series of sequential steps undertaken to limit any adverse impacts on the environment and has the following steps in order of priority: 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 The mitigation hierarchy has been used in the identification and design of mitigation. Aspect specific mitigation has been outlined in each of the individual environmental aspect chapters. It is important to note that proposed mitigation measures can only be taken into account when determining significance if the success of the measures delivering the desired outcome is supported by evidence and the Scheme has an identified legal mechanism for implementing the measures. If effects cannot be mitigated, compensatory measures would be considered, for example, to provide replacement habitat. However, at the present time the assessment presented in the ES have determined that this is not required with all mitigation being provided onsite with the exception of bat and barn owl boxes where an off-site location has been chosen to increase the biodiversity benefits that these will provide. The environmental assessment will report on the following categories of mitigation described below as per DMRB LA 104 paragraph 3.24.
5.57	The Secretary of State will need to take account of the advice provided to the applicant by Natural England and/or the Marine Management Organisation and/or the Environment Agency, as regards to necessary	See the responses to NPS NN paragraphs 5.46 and 5.48.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	mitigation measures and whether these organisations have granted or refused, or intend to grant or refuse, any relevant licences or permits, including protected species mitigation licences. In advance of the formal submission, applicants are encouraged to use Natural England's Letter of No Impediment Approach and engage with Natural England.	Consultee comments were received in response to the Environmental Scoping Report (National Highways, June 2023) (**TR010066/APP/6.8**). The Applicant's responses to the Scoping Opinion (**TR010066/APP/6.9**) are contained in the ES Appendix 4.1 (Scoping Opinion Response) (**TR010066/APP/6.3**). Responses in relation to the statutory consultation undertaken and further post – statutory consultation engagement are presented in the Consultation Report (**TR010066/APP/5.1**). Table 8-1 of ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) details additional consultation undertaken as part of this assessment including engagement Natural England and the Environment Agency. In June 2024, Natural England provided a Letter of No Impediment in regard to the draft licence application for the closure of the badger subsidiary sett within the Scheme. This letter is included as ES Appendix 8.14 (Natural England Letter of No Impediment) (**TR010066/APP/6.3**). Consents and licences in addition to those included in the draft DCO (**TR010066/APP/3.1**) are outlined in the Consents and Agreements Position Statement (**TR010066/APP/3.3**).
Internationally important nature sites		
5.58	The most important sites for biodiversity in the UK are afforded special protection by the Habitats Regulations. These sites are designated as Special Areas of Conservation and Special Protection Areas and are collectively known as habitat sites. The following should be given the same protection as sites legally protected by the Habitats Regulations: potential Special Protection Areas and possible Special Areas of Conservation, listed or proposed Wetlands of International Importance (Ramsar sites), and sites identified, or required, as compensatory measures for adverse effects on habitat sites.	See response to NPS NN paragraph 4.14. A Habitats Regulations Assessment screening exercise was undertaken to inform the preliminary design stage, as reported in Appendix 8.12 (Habitats Regulations Assessment Screening Report) (**TR010066/APP/6.3**) to determine whether an Appropriate Assessment would be required regarding the Scheme's potential impact upon any sites of European importance ((SACs), candidate or possible SACs (cSACs or pSACs), SPAs, potential SPAs (pSPAs) and Ramsar sites). This report concluded that no further assessment of European designated sites was required.
5.59	The Habitats Regulations set out a specific process (see paragraphs 4.14 to 4.18) to assess the likely implications for these sites from a	See response to NPS NN paragraphs 4.14 and 5.58.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	proposed plan or project. To maintain the overall cohesion of the National Site Network, such plans or projects may only proceed if the assessment concludes they will not adversely affect the integrity of the site or, in the case of a negative assessment, if there are no alternative solutions, and they must proceed for imperative reasons of overriding public interest with the necessary compensatory measures secured.	
Nationally important nature sites: Sites of Special Scientific Interest		
5.61	Where a proposed development on land within or outside of a Site of Special Scientific Interest is likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) development consent should not normally be consented. An exception should only be made where the benefits of the development proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The Secretary of State should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. The Secretary of State is bound by the duty placed on all public bodies in section 28G of the Wildlife and Countryside Act 1981 to take reasonable steps, consistent with the proper exercise of their functions, to further conservation and enhancement of the features by reason of which a site is of special scientific interest.	ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) fully assesses impacts of the Scheme upon SSSIs within the study area that are scoped in, in accordance with the Wildlife and Countryside Act 1981. This Chapter describes that the Scheme is anticipated to result in a residual significant adverse effect upon Coombe Pool SSSI during construction, which includes a moderate adverse effect on breeding waterbirds, including grey heron, and a large adverse effect on wintering waterbirds including shoveler. This is due to temporary construction noise impacts. Further information is detailed within ES Appendix 8.16 (Assessment of Noise Impacts on Ecological Features) (**TR010066/APP/6.3**) and ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**). Natural England have been consulted on these matters and discussions are ongoing. This assessment of noise impacts upon the Coombe Pool SSSI presented in ES Chapter 8 (Biodiversity) (TR010066/APP/6.1) does not consider any mitigation and thus presents the worst-case in the event that mitigation is not practicable. To reduce noise levels, it is proposed that one option is to install a 2m high noise barrier along the boundary of the SSSI for the duration of construction works that lead to significant noise effects. Within ES Figure 8.3 (Proposed Construction Mitigation Noise Barrier – December 2026) (**TR010066/APP/6.2**) are two panels showing the impacts with and without the 2, high noise barrier. As shown on the Figure, the noise barrier proposed would reduce the area of the SSSI and specifically the pool which would experience changes in noise >5.0dB. However, much of the pool would still experience noticeable noise change >3dB. Therefore, further mitigation measures, which may include programming of works to avoid sensitive periods and/or use of quieter machinery, would be developed at detailed design where practicable to further reduce the noise levels impacting the SSSI during

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		construction. These mitigation measures will be detailed in the Second Iteration EMP, discussed with Natural England and secured in the DCO. For the purposes of this assessment the worst case has been presented. No residual significant effects are anticipated during operation. Monitoring during both construction and operation will aim to record changes in the ecological baseline, determine whether the mitigation/compensation measures are successful, and inform whether remedial actions are required. The Scheme monitoring requirements are detailed within the First Iteration EMP (**TR010066/APP/6.5**). In accordance with Requirement 4 of the draft DCO (**TR010066/APP/3.1**) a Second Iteration EMP will secure the monitoring requirements and procedures, as summarised below, to reduce or eliminate impacts on the environment prior to construction commencing. An Ecological Clerk of Works (ECoW) would be employed during the construction phase where relevant to monitor implementation and effectiveness of mitigation measures during construction detailed within the First Iteration EMP (**TR010066/APP/6.5**). Overall, as the adverse effects on the SSSI are only during the construction phase, mitigation and management will be put in place to reduce or eliminate impacts. The benefits of the Scheme as outlined in this Case for the Scheme (**TR010066/APP/7.1**) outweigh harm caused by the Scheme on the SSSI. The 'critical need' to improve the SRN to deliver a national network that meets the country's long-term needs and supports a prosperous and competitive economy, reduced congestion and improvements to journey time reliability, and benefits to businesses during the operational phase bring substantial weight in favour of the draft DCO being made.
Irreplaceable habitats including ancient woodland, and ancient and veteran trees		
5.63	The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient and veteran trees unless there are wholly exceptional reasons (for example, where the	There is no significant effect on ancient woodland or veteran trees. This ES Chapter (Biodiversity) (**TR010066/APP/6.1**) fully assesses impacts of the Scheme upon irreplaceable habitats - ancient woodland and veteran trees.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.	Table 8-21 details significant residual effects, which shows no likely significant effects on ancient woodland and veteran trees. As described in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), ES Appendix 8.15 (Air Quality Impacts of Ecological features) (**TR010066/APP/6.3**), concludes a slight adverse effect (not significant) upon ancient woodland and a veteran tree during operation due to changes in air quality, due to impacts upon one veteran tree (T12) outside of the Order Limits and one further tree (T11) also outside of the Order Limits identified as 'beginning to veteranise' in the Arboricultural Impact Assessment (ES Appendix 7.4 (**TR010066/APP/6.3**)) and ancient woodland at Binley Common Farm Wood.
Nationally important nature sites: Marine Conservation Zones		
5.64	Marine Conservation Zones, introduced under the Marine and Coastal Access Act 2009, have been designated for the purpose of conserving marine flora or fauna, marine habitats or types of marine habitat or features of geological or geomorphological interest. Marine Conservation Zones form part of the Marine Protected Areas network together with Special Areas of Conservation and Special Protection Areas. The protected feature or features and the conservation objective for the Marine Conservation Zones are stated in the designation order for the Marine Conservation Zones, which provides statutory protection for these areas. Measures to restrict damaging activities are being implemented by the Marine Management Organisation and other relevant organisations. As a public authority, the Secretary of State is bound by the duties in relation to Marine Conservation Zones imposed by sections 125 and 126 of the Marine and Coastal Access Act 2009.	The Scheme will not affect any Marine Conservation Zones.
Regional and Local Sites		
5.65	Sites of regional and local biodiversity and geographical interest, which includes Local Geological Sites, Local Nature Reserves and Local Wildlife Sites and Nature Improvement Areas, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including contributing to the quality of life and well-being of the community, and in supporting research and education. The Secretary of	ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) shows that the Scheme will not have any significant effects on any local biodiversity and geographical interest. With regards to local biodiversity and geographical interests only, the Scheme is anticipated to have the following effects (worst adverse effects only

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	State should give due consideration to any such harm to the detriment of biodiversity and geological features of regional or local importance which s/he considers may result from a proposed development. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, nevertheless the mitigation hierarchy applies to these sites.	reported), excluding neutral only effects, during the construction phase, assessed as not significant in accordance with DMRB *LA 108*: • Slight adverse effect on Coombe Abbey Local Wildlife Site (LWS) The Scheme is anticipated to have the following effects (worst adverse effects only reported), excluding neutral only effects, during the operation phase, assessed as not significant in accordance with DMRB LA 108: • Slight adverse effect on Herald Way Marsh SSSI and Local Nature Reserve (LNR) • Slight adverse effect on Willenhall Wood LNR, LWS and ancient woodland • Slight adverse effect on Gainford Rise LWS • Slight adverse effect on Stretton Croft LWS • Slight adverse effect on Coombe Abbey LWS • Slight adverse effect on Piles Coppice LWS and ancient woodland Slight adverse effect on Lower Sowe Meadows The Scheme is anticipated to result in a residual significant effect upon Coombe Pool SSSI during construction. No residual significant effects are anticipated during operation. Monitoring during both construction and operation will aim to record changes in the ecological baseline, determine whether the mitigation/compensation measures are successful, and inform whether remedial actions are required. The Scheme monitoring requirements are detailed within the First Iteration EMP (**TR010066/APP/6.5**). In accordance with Requirement 4 of the draft DCO (**TR010066/APP/3.1**) a Second Iteration EMP will secure the monitoring requirements and procedures, as summarised below, to reduce or eliminate impacts on the environment prior to construction commencing. An ECoW would be employed during the construction phase where relevant to monitor implementation and effectiveness of mitigation measures during construction detailed within the Second Iteration EMP which would be developed prior to construction and based upon the First Iteration EMP (**TR010066/APP/6.5**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Biodiversity within and around developments		
5.66	Development proposals provide many opportunities for incorporating beneficial biodiversity or geological features as part of good design. Nature contributes to the quality of a place, to people's quality of life, the attractiveness of active travel routes and movements, and it is a critical component of well-designed development. Road and rail projects can also play a part in meeting government tree planting and nature recovery targets through partnership working with adjoining landowners, delivering biodiversity, carbon offsetting and social benefits.	See response to NPS NN paragraph 4.27 and 4.28. The Scheme Design Report (**TR010066/APP/7.4**) outlines each of the ten design principles have been taken into account in the design and Table 4-1 sets out how the Scheme design reflects the ten design principles contained in the Road to Good Design. This includes: *"6. Good road design is environmentally sustainable"*. The table outlines the following design approaches to show how these design principles have been applied to the Scheme: **Planting Design** The design approach to the new planting within the Environmental Masterplan (**TR010066/APP/6.5**) ensures a measured balance of new planting with existing landscape, biodiversity and the built and historic environment. This includes: • suitably selected grass verges that are low maintenance and minimise height growth for visibility splays • biodiversity driven species rich grassland and habitat creation throughout the Scheme • appropriate mixes for tree, hedgerow and shrub planting to replace, compensate and mitigate for identified impacts within the environmental assessment appropriate planting offsets from new and existing highway infrastructure such as drainage, fencing, lighting, bridges (concrete), etc and existing and proposed utilities. **Environmental mitigation and enhancement measures** As part of the EIA process design influence and mitigation / enhancement measures are integrated as early as possible. Continued dialogue and close working with the design team has ensured that, where possible: • environmental constraints have been avoided, such as residential receptors and existing vegetation / habitat

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		• BNG has been maximised where possible, such as with the introduction of species-rich and marshy, wet grassland (see the response to NPS NN paragraph 4.23). Integrating Scheme infrastructure (notably the elevated overbridge) with landscape planting design. Planting, once established, will reinstate the woodland belt landscape character present along the A46, the key driver in developing the design. The Scheme design seeks to maximise biodiversity benefit in accordance with the Outline Landscape and Ecology Management Plan (OLEMP) within the First Iteration EMP (**TR010066/APP/6.5**) The OLEMP guides the delivery and ensures robustness of the mitigation measures embedded within the Environmental Masterplan (ES Figure 2.4 (**TR010066/APP/6.2**)). **Design changes to reduce carbon** At options stage the carbon emission for the construction phase of the Scheme was anticipated to be approximately 44273.53 tCO2e. A hierarchical approach to carbon management has been applied, i.e. build nothing, build less, build clever, build efficiently (as described in carbon management in infrastructure standard PAS 2080). Throughout preliminary design, a carbon opportunities log has been developed and populated, and workshops have been held with the discipline leads and the contractor to explore how carbon emissions can be reduced from the options baseline, both through construction operations and within the permanent Scheme design. Measures incorporated into the design following this process include: • reduction in overbridge cross section by the removal of the median • retention of the existing Hungerley Hall Farm accommodation overbridge to avoid demolition • removal of piles from bridge foundations • reduction in the extent of surfacing required within the Scheme • design speed of the B4082 reduced from 60mph to 40mph which reduces user emissions

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• ongoing engagement with the principal contractor to reduce the area of vegetation clearance, in particular the number of trees to be felled Carbon emissions for the construction phase of the Scheme are now calculated for the Scheme design are estimated to be 16,165 tCO2e. The use of the National Highways Carbon Tool to monitor and manage carbon will continue through Detailed Design.
5.67	Consideration should be given to the impacts on, and improvements to, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, relevant to the local area and communities. The value of linear infrastructure and its footprint in supporting biodiversity and connecting habitats ecosystems should also be taken into account. Local nature recovery strategies will identify opportunities to create or enhance habitat likely to have greatest benefit to biodiversity and wider environmental improvement. Consideration should also be given to national priorities and targets, such as reduced flood risk, improved air or water quality, and increased access to natural greenspace, or tree planting, woodland creation and protecting long established woodlands.	See response to NPS NN paragraphs 5.49, 5.51 and 5.52. As stated in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), at the time of writing this ES the Local Nature Recovery Strategies for Warwickshire and the West Midlands have not been published.
5.68	When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities and enhancement of wider biodiversity, in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered, and ongoing management and maintenance secured.	See response to NPS NN paragraphs 5.58, 5.49, 5.51 and 5.52. As shown ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), the Scheme design seeks to maximise biodiversity delivery. Habitats created would be managed in accordance with the Outline Landscape and Ecology Management Plan (OLEMP) within the First Iteration EMP (**TR010066/APP/6.5**) to maximise biodiversity delivery and ensure robustness of mitigation measures embedded within the Environmental Masterplan (ES Figure 2.4 (**TR010066/APP/6.2**)).
Habitats and Species of Principal Importance		
5.69	Many individual wildlife species receive statutory protection under a range of legislative provisions. Some species and habitats have been identified as being of principal importance for the conservation of	ES Chapter 8 Biodiversity (**TR010066/APP/6.1**) considers all species

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	biodiversity in England and Wales and therefore requiring conservation action. As a public authority, the Secretary of State is bound by the duty in section 40 of the Natural Environment and Rural Communities Act 2006 (as amended by section 102 of the Environment Act 2021) to periodically consider what action an authority can take, consistent with the exercise of its functions, to further the conservation and enhancement of biodiversity. In doing so, the Secretary of State may consider the impact on species and habitats listed under Section 41 of the Act. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of the development by using requirements, planning obligations, or licence conditions. The Secretary of State should refuse consent where harm to habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.	and habitats including priority habitats and priority species listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (as amended by section 102 of the Environment Act 2021). Section 8.8 details the baseline conditions for the assessment. Sections 8.9, 8.10 and 8.11 go on to detail potential impacts of the Scheme, design, mitigation and enhancement measures and the assessment of likely significant residual effects respectively. The ES Chapter is supported by a series of technical appendices 8.1 – 8.16 (**TR010066/APP/6.3**) including notable and protected species survey reports. The Environmental Masterplan (ES Figure 2.4 (**TR010066/APP/6.2**) identifies areas for habitat creation to mitigate for the loss of habitats. There are no residual impacts of significance in relation to species and habitats that are not compensated for elsewhere in the Scheme. An Outline Landscape and Ecology Management Plan is included as Appendix B.4 of the First Iteration EMP (**TR010066/APP/6.5**). The First Iteration EMP (**TR010066/APP/6.5**) sets out good practice environmental measures that would be implemented for biodiversity during construction, why they are required, who is responsible for delivering them and details any ongoing maintenance arrangements. The Second Iteration EMP is secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). A Landscape and Ecology Management Plan will be produced as part of the Second Iteration EMP.
Resource and Waste Management		
Applicant's assessment		
5.71	The applicant should demonstrate that they will adhere to the waste hierarchy, preventing and reducing waste produced in the first place and maximising preparation for reuse and recycling for waste that cannot be prevented. Where possible, applicants are encouraged to use existing materials first, then low carbon materials, sustainable sources, and local suppliers. Consideration should be given to circular economy principles wherever practicable, for example, by using longer lasting materials efficiently, optimising the use of secondary materials and how the	ES Chapter 10 (Material Assets and Waste) (**TR010066/APP/6.1**) presents the information required by the Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017 (as amended) to be provided in the ES to enable the identification and assessment of likely significant effects on materials assets and waste. The assessment in ES Chapter 10 (Material Assets and Waste) (**TR010066/APP/6.1**) has adhered to the plans and requirements of the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	development will be maintained and decommissioned. Applicants should consider and take into account emerging government policy including Maximising Resources: Minimising Waste constituting the new Waste Prevention Programme for England and Defra's Construction Code of Practice for Sustainable Use of Soils on Construction Sites, which provides practical guidance on how to improve appropriate soil reuse on construction sites and reducing the volume that is sent to landfill.	Environment Act 2021, including separation of recyclable waste from residual waste, implementation of waste hierarchy and circular economy principles to manage waste as higher up in the waste hierarchy as technically and economically feasible, appropriate control and reporting of waste generated at the Scheme, and appropriate management of hazardous waste (if any arises). The assessment has considered disposal to landfill as the last option for waste management, prioritising the higher up options of the waste hierarchy detailed in the Waste (England and Wales) Regulations 2011 (as amended). Minimising the production of waste has been considered throughout the design of the Scheme. The Scheme would apply a waste hierarchy in order to move waste management practices as far up the hierarchy as possible, minimising disposal and maximising re-use and recycling. Construction of the Scheme would require excavation in places to form cuttings for the highway, ground improvement, foundations, soakaways, other drainage and miscellaneous features. Where material is recoverable, this material would then be used to form embankments or for other fill requirements. This is considered in greater detail in ES Chapter 10 (Material Assets and Waste) (**TR010066/APP/6.1**). In accordance with DMRB LA 120 Environmental management plan (Highways England 2019), a First Iteration EMP (**TR010066/APP/6.5**) has been produced for the Scheme. It has been prepared in parallel with development of the Scheme design and construction methodologies. Measures and procedures within the First Iteration EMP include design, construction and operational mitigation, which have been developed in-line with the requirements arising from the ES. The First Iteration EMP (**TR010066/APP/7.5**) indicates the environmental mitigation measures that would be implemented during construction. The EMP includes the production of a detailed SWMP that includes procedures for the management of hazardous and non-hazardous waste. It also sets out why measures are required, who is responsible for delivering them and any ongoing maintenance and monitoring arrangements.

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		The REAC (Appendix A) of the First Iteration EMP (**TR010066/APP/6.5**) includes the following commitments • MA1: waste hierarchy implementation The Scheme aims to prioritise waste prevention, followed by preparing for re-use, recycling and recovery and lastly disposal to landfill. • MA2: designing out waste Designing out waste is one of the key tenets of a circular economy. The Principal Contractor will implement the principles of designing out waste to reduce it and reduce the total material assets demand of the detailed design. • MA3: use of secondary or recycled materials The Principal Contractor will prioritise the use of secondary or recycled materials in accordance with the relevant legislation, standards and specification for these works with an aim to reduce the requirement to import materials for construction and reduce the need to remove surplus materials from site. • MA4: local and responsible sourcing of material assets: The principles of local and responsible sourcing of key material assets will be adopted by the Principal Contractor in accordance with their policies on sustainable procurement. • MA5: soil handling management plan: A soil handline management plan (SHMP) will be developed and form part of the Second Iteration EMP. In addition to ensuring soil sustainability during construction, it will detail how all construction phase material assets be managed and identify opportunities to substitute recycled or secondary materials and products for those using primary materials.

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		The Scheme is known to intersect areas of historical landfill operations (see section 10.4: Environment Agency consultation). If historical wastes associated with the landfills are encountered during construction, they cannot be retained. They must be removed from the Scheme in a manner that will not cause a detrimental impact to the surrounding environment. Excavation arisings should be managed in accordance with Construction Industry Research and Information Association (CIRIA) publication C809: Sustainable Management of Surplus Soil and Aggregates from Construction (2023) and DEFRAs Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (September 2009) provides practical guidance on how to improve appropriate soil re-use on construction sites and reducing the volume of soils that are sent to landfill. • MA6: site waste management plan: An outline site waste management plan (SWMP) has been produced for the Scheme which forms part of the First Iteration EMP. This will be developed and the SWMP will form part of the Second Iteration EMP. It will identify the types and likely quantities of wastes that may be generated, and set out, in an auditable manner, how waste will be reduced, re-used, managed and disposed in accordance with the waste hierarchy and other legislative requirements. • MA7: materials management plan: A materials management plan (MMP) would be prepared where applicable to provide lines of evidence covering the use of clean site won materials within the Scheme. If required, the MMP would be developed and form part of the Second Iteration EMP, as secured in Schedule 2 of the draft DCO (**TR010066/APP/3.1**). The Second Iteration EMP will be developed before construction works commence as part of the detailed design stage. It will include the adoption and implementation of industry standard practice and measures for controlling the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		impacts of the proposals on material assets and waste. The Second Iteration EMP will comprise three core documents specifically relating to the management of these aspects: • Soil handling management plan (SHMP) • Site waste management plan (SWMP) • Material management plan (MMP) if applicable The Second Iteration EMP will require that waste management measures and strategies are implemented in order to reduce the likelihood of any localised impacts of waste on the surrounding environment through the minimisation of waste generation and the increase in materials re-use and recycling. The Scheme Design Report (**TR010066/APP/7.4**) also references the minimisation of the use of natural resources thus preventing waste and complying with the hierarchy. For example, this includes reducing the level of works required to the A46 mainline, which results in a substantial reduction in the volume of materials required to deliver the Scheme and realise it's benefits. This has the benefits of minimising the use of natural resources and subsequent carbon emission related to construction. There is also scope at detailed design development to reduce the height of the junction as the deck depth has been optimised. As in the design panel observation 12 reducing the levels of the bridge and junction would reduce the volume of imported fill and benefit the Scheme if it could be realised. This would reduce the use of natural resources and bring with it benefits to climate change through reduced carbon emissions related to diminished construction activities.
Mitigation		
5.72	A circular approach to waste management is encouraged from the outset, for example, green and sustainable procurement exercises, or using sustainably sourced materials from local suppliers.	See response to NPS NN paragraph 5.71.
5.73	Sustainable waste management is implemented through the waste hierarchy: • prevention • preparing for reuse	See response to NPS NN paragraph 5.71.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• recycling • other recovery, including energy recovery • disposal	
5.74	Large infrastructure projects may generate a range hazardous and non-hazardous waste during construction and operation. Projects may need to comply with the relevant regulatory waste regimes. The Environmental Permitting regime, regulated by the Environment Agency in England, incorporates operational waste management requirements for certain activities. Applicants should therefore give consideration to how waste regulations apply to their development, including the Environmental Permitting requirements.	See the response to NPS NN paragraph 5.71. ES Chapter 10 (Material Assets and Waste) (**TR010066/APP/6.1**) summarises the legislation that is relevant to this aspect and how these requirements have been addressed in the assessment. This includes the Hazardous Waste Directive (91/689/EEC) which has been considered in the event that hazardous waste arises from the Scheme's activities. In which case, the waste management will adhere to the requirements for controlling hazardous waste. Also considered which include reference to hazardous waste include: • Environmental Protection Act 1990 • EU (Withdrawal) Act 2018 • The Environment Act 2021 • The Waste (England and Wales) Regulations 2011 (as amended) • Hazardous Waste (England and Wales) Regulations 2005 (as amended) • Hazardous Waste (Miscellaneous Amendments) Regulations 2015 • The Landfill (England and Wales) Regulations 2002 (as amended). An Outline Site Waste Management Plan (SWMP) has been produced for the Scheme which forms part of the First Iteration EMP (**TR010066/APP/6.5**). This will be developed and the SWMP will form part of the Second Iteration EMP. It will identify the types and likely quantities of wastes that may be generated, and set out, in an auditable manner, how waste will be reduced, re-used, managed and disposed in accordance with the waste hierarchy and other legislative requirements. Materials and waste permits required for the Scheme and status of negotiations with statutory bodies are included in the Consents and Agreements Position Statement (**TR010066/APP/3.3**), these include: - Waste exemptions for operations such as U1 (import of waste for use in construction) under the Environmental Permitting (England and Wales) Regulations 2016

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		- Environmental Permit - Part B Local Authority Pollution Prevention and Control under the Local Authority Pollution Prevention and Control Act 1999 - Environmental Permit - Mobile Treatment Plant Permit and Deployment under the Environmental Permitting (England and Wales) Regulations 2016 and the Pollution Prevention and Control Act 1999 - Licence to work with Asbestos under the Control of Asbestos Regulations 2012
5.75	Infrastructure projects should look to use Modern Methods of Construction, such as legal and sustainable timber and low carbon concrete and other sustainable design practices, where possible.	See response to NPS NN paragraph 5.71.
Decision-making		
5.76	The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure safe and effective management of waste arising from the construction and operation of the proposed development. It is advised that this is detailed in the dedicated plans summarising the sustainable use of resources and waste for both construction and operation as part of the application documentation. The Secretary of State should be satisfied that the process sets out: • adequate steps have been taken to minimise the volume of waste arising and maximise opportunities for reuse and recycling • how waste will be managed, but on-site and off-site • that consideration has been given to available waste management infrastructure capacity to manage waste arising from the development	See response to NPS NN paragraph 5.71.
Civil and military aviation and defence interests		
Applicant's assessment		
5.88	Where the proposed development may have an effect on civil or military aviation and/or other defence assets, an assessment of potential effects should be carried out.	Consultation has been undertaken with the relevant bodies (Ministry of defence, Civil Aviation Authority, National Air Traffic Services and any aerodrome, licensed or otherwise).

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		It is not expected that the Scheme will result in significant effects on any civil or military aviation interests. Further details of the organisations consulted can be found in the Consultation Report, Annex G (**TR010066/APP/5.2**).
5.89	The applicant should consult the Ministry of Defence, Circular and Civil Aviation Authority, National Air Traffic Services and any aerodrome – licensed or otherwise - likely to be affected by the proposed development in preparing the assessment of the proposal on aviation or other defence interests.	See response to NPS NN paragraph 5.88.
5.90	Any assessment on aviation or other defence interests should include potential impacts during construction and operation of the project upon the operation of communications, navigation and surveillance infrastructure, flight patterns (both civil and military), other defence assets and aerodrome operational procedures.	See response to NPS NN paragraph 5.88.
5.91	If any relevant changes are made to proposals for a Nationally Significant Infrastructure Project (NSIP) during the pre-application period or before the end of the examination of an application, it is the responsibility of the applicant to ensure that the relevant aviation and defence consultees are informed as soon as reasonably possible.	See response to NPS NN paragraph 5.88.
Mitigation		
5.92	Where a proposed national networks infrastructure project would significantly impede or compromise the safe and effective use of civil and military aviation or defence assets and/or significantly limit military training, the Secretary of State may consider the use of Grampian conditions or other forms of requirements which relate to the use of future technologies solutions to mitigate impacts. Where technological solutions have not yet developed or proven, the Secretary of State will need to consider the likelihood of a solution becoming available within the time limit for implementation of development consent.	See response to NPS NN paragraph 5.88.
5.93	Mitigation for infringement of obstacle limitation surfaces may include:	See response to NPS NN paragraph 5.88.

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	• amendments to the layout or scale of infrastructure to reduce the height, provided that it does not result in an unreasonable reduction of capacity or unreasonable constraints on the operation of the proposed national networks infrastructure • changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the Civil Aviation Authority where changes are proposed to a civilian aerodrome (and provided that it does not result in an unreasonable reduction in capacity or unreasonable constraints on the operation of the aerodrome) • upgrading the installation of obstacle lighting and/or by notification in Aeronautical Information Services publications	
5.94	Development should not increase the risk of bird strike in aerodrome safeguarding consultation areas. Further guidance on wildlife hazards management considerations is published by the Civil Aviation Authority. Schemes should follow best practice to demonstrate wildlife hazard risk has been considered and mitigated. Mitigations may include particular plant species and features that are unlikely to attract birds.	See response to NPS NN paragraph 5.88.
5.95	For communications, navigation and surveillance infrastructure, the UK military Low Flying system (including Tactical Training Areas) and designated air traffic route mitigation may include: • lighting • upgrading of existing communications, navigation and surveillance infrastructure, the cost of which the applicant may reasonably be required to contribute in part or full.	See response to NPS NN paragraph 5.88.
5.96	Mitigation of effects on radar and navigational systems may include reducing the scale of the project, although in some cases this is likely to be unreasonable to require mitigation by way of a reduction in the scale of the development, for example where this would result in a material reduction in capacity or where operations would be severely constrained. However, there may be exceptional circumstances where a small	See response to NPS NN paragraph 5.88.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	reduction in capacity or other small change to the project will result in proportionately greater mitigation. In these cases, the Secretary of State may consider the benefits of the mitigation outweigh the marginal loss, for example, of capacity.	
Decision-making		
5.97	The Secretary of State should be satisfied that the effects on civil and military aviation and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation or defence interests has been carried out, In particular, it should be satisfied that the proposal has been designed to minimise adverse impacts on the operation and safety of aerodromes and that reasonable mitigation is carried out. It may also be appropriate to expect operators of the aerodrome to consider making reasonable changes to operational procedures. The Secretary of State will have regard to the necessity, acceptability and reasonableness of operational changes to aerodromes, and the risks or harm of such changes when taking decisions. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security.	See response to NPS NN paragraph 5.88.
5.98	If there are conflicts between the government's national networks policies and military interests in relation to the application, the Secretary of State expects the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to conflicts. In doing so, the parties should seek to protect the aims and interests of the other parties as far as possible.	See response to NPS NN paragraph 5.88.
5.99	There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that go beyond statutory requirements by any of the relevant aviation and defence consultees, the Secretary of State should be satisfied of the necessity of such lighting, taking into account the case put forward by the consultees. The effect of such lighting on the landscape, local residents and ecology may be a relevant consideration, depending on the particular circumstances.	See response to NPS NN paragraph 5.88 and 5.120.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.100	Where, after reasonable mitigation, operational changes and planning obligations and requirements have been proposed, development consent should not be granted if the Secretary of State considers that either • a development would prevent a licensed aerodrome from maintaining its licence • the benefits of the proposed development are outweighed by the harm to aerodromes serving business, training, or emergency service needs • the development would significantly impede or compromise the safe and effective use of defence assets or significantly limit military training	See response to NPS NN paragraph 5.88.
Dust, odour, artificial light, smoke, steam		
Applicant's assessment		
5.120	The applicant should assess the potential for emissions of odour, dust, steam, smoke and artificial lighting to have a detrimental impact on amenity.	ES Chapter 5 (Air Quality) (Section 5.9) (**TR010066/APP/6.1**) presents the findings of the assessment of potential impacts of the Scheme on air quality, undertaken in accordance with the DMRB, LA 105 Air Quality and Institute of Air Quality Management. The construction phase of the Scheme is identified as having a 'large' potential impact from fugitive dust emissions, with the receiving environment sensitivity being 'high'. With the application of best practice construction mitigation measures, as included in the Scheme's First Iteration EMP (**TR010066/APP/6.5**), the impact of construction dust is unlikely to trigger a significant air quality effect. Given the intermittent use of non-road mobile machinery and the transient nature of construction works, emissions from such plant will not have a material impact on air quality. Therefore, no further assessment has been undertaken. Similarly, the need for further assessment of construction vehicle emissions was scoped out in the Environmental Scoping Report (**TR010066/APP/6.8**) due to the proposed construction programme being less than two years in duration. As such, their impact of emissions from construction vehicle emissions will have no significant effect on local air quality

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		and will not affect the UK's ability to comply with Air Quality Standards Regulations 2010. A detailed and verified air quality modelling exercise was completed with respect to assessing operational phase air quality impacts at both human and ecological receptors. With respect to human health, a total of 94 discrete sensitive receptors were included in the assessment. The modelling has demonstrated that the air quality objectives for NO_2 and particulate matter (PM_{10}) are not predicted to be exceeded both without and with the Scheme in the opening year (2028). As such, there will be no likely significant air quality effect for human health. The operational phase study area captured sensitive features and habitats within multiple ecological designations which were assessed with regards to nitrogen oxides (NO_x), ammonia NH_3 and nitrogen (N) -deposition. Where exceedances of the relevant critical levels and critical loads were modelled, they occurred in both the do-minimum (DM) (without Scheme) and do something (DS) (with Scheme) 2028 scenarios, such that the Scheme is not predicted to introduce any new exceedances. However, a number of the modelled receptor transects were predicted to exceed the respective 1% significance screening criteria within some of the modelled designated sites, including but not limited to Coombe Pool SSSI (N deposition), Herald Way Marsh SSSI (N deposition) and Willenhall Wood LWS/LNR (NOx, NH_3 and N deposition). Following review of the ecological receptor results by the competent biodiversity expert for the project, it was confirmed that the transect receptors exceeding the 1% criterion are generally not within the relevant designated feature, with these locations being primarily roadside highway boundary woodland habitat where qualifying habitats are likely not present. Given this, in combination with the high baseline levels for NH_3 concentrations and N deposition rates and the areas of impacted habitat relative to the sites as a whole, the impacts attributed to the Scheme are reported to be marginal. On this basis, and within the further discussion, (ES Appendix 8.15 (Assessment of Air Quality Impacts on Ecological Features)

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		(**TR010066/APP/6.3**)), the competent biodiversity expert concluded that there are no likely significant air quality effects on the assessed designated sites. A compliance risk assessment was undertaken to assess the potential for the Scheme to affect the UK's compliance with respective legal air quality limit values, specifically with respect to NO_2. The outcomes of the assessment demonstrate that there is no risk of the operational Scheme affecting national compliance. The air quality assessment has adhered to the requirements set out in sections 5.12 and 5.13 of the NPS NN and has concluded there will be no significant effects in terms of air quality on human and ecological receptors as a result of the Scheme. The potential effects of lighting have been identified as part of a landscape and visual impact assessment reported in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**), which also details the methodology followed. ES Appendix 7.5 (Lighting Assessment) (**TR010066/APP/6.3**) also provides an analysis and assessment of the potential lighting effects on sensitive receptors. Section 102 of the Clean Neighbourhoods and Environment Act 2005 amends Section 79 of the EPA to include artificial light emitted from premises, where the latter is defined as including land. For artificial light to count as a statutory nuisance it must do one of the following: • unreasonably and substantially interfere with the use or enjoyment of a home or other premises; and • injure health or be likely to injure health. As street lights are not covered by the laws on statutory nuisance, it is not necessary to address these; however it is necessary to address temporary lighting equipment to be used to illuminate the construction tasks. The majority of construction activity would be undertaken between 07:00 and 19:00 on weekdays; and between 07:00 and 14:00 on Saturdays. During those working hours, there will be the requirement for artificial lighting of construction areas when it gets dark.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Some works cannot be completed within the daytime traffic management phasing. These works will need to be undertaken under night-time or weekend closures. These activities include: • Traffic management installation and phase changes • Construction of temporary carriageway widening • New carriageway tie ins on the A46 and B4082 • Resurfacing works • Road marking installation • Central reserve construction • Installation of signalised pedestrian crossing on the B4082 • Installation of the new overbridge deck Impacts from artificial lighting will be mitigated as outlined in the REAC (Annex A of the First Iteration EMP (**TR010066/APP/6.5**)). Commitment G3 of the REAC states: Lighting shall be at the minimum luminosity necessary and use low energy consumption fittings. Lighting shall comply with the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light GN016 and the provisions of BS 5489 Code of practice for the design of road lighting, where applicable. Lighting will be directional and positioned sympathetically to minimise light spill. Where construction lighting is required, it would be limited in duration and where feasible directed away from sensitive receptors. The only sensitive receptors determined that may be affected by artificial lighting are species and habitats. Human receptors including residential properties and businesses have not been determined as sensitive receptors to artificial lighting during the construction of the Scheme. Apart from Hungerley Hall Farm, there are no properties contiguous with the Scheme boundary. The potential effects of lighting have been identified as part of a landscape and visual impact assessment reported in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**), and the ES Appendix 7.5 (Lighting Assessment) (**TR010066/APP/6.3**), which also details the methodology followed. With the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		application of mitigation measures in the First Iteration EMP (**TR010066/APP/6.5**), it is considered that no statutory nuisance would arise during construction, nor would it be prejudicial to health under Section 79(1)(fb) of the EPA. Visual amenity is also assessed in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). Please refer to the response to NPS NN paragraph 5.162 for more details on how visual amenity has been assessed and the impacts of the Scheme on visual amenity.
5.121	In particular, the assessment provided by the applicant should describe: • the type and quantity of emissions • aspects of the development which may give rise to emissions during construction, operation and decommissioning • premises, locations or species that may be affected by the emission • effects of the emission on identified premises or locations • measures to be employed in preventing or mitigating emissions	See response to NPS NN paragraph 5.1.20.
5.122	The applicant is advised to consult the relevant local environmental health team, and where appropriate, the Environment Agency about the scope and methodology of the assessment.	An Environmental Scoping Report was submitted to the Planning Inspectorate in 2023 (**TR010066/APP/6.8**). A Scoping Opinion was received in response to the Scoping Report (2023) (**TR010066/APP/6.9**), and this included responses from local authorities and the Environment Agency. The Applicant's responses to the Scoping Opinion are contained in the Scoping Opinion Response, ES Appendix 4.1 (**TR010066/APP/6.3**). The Environment Agency did not raise any comments about air quality in their Scoping Opinion response. Rugby Borough Council response to refer the Applicant to their Local Plan Policy HS5 (Traffic Generation and Air Quality) and RBC Air Quality Supplementary Planning Document (July 2021) and stated that "*Mitigation will be necessary for the control of construction dusts as identified. It is recommended that the scoping out of vehicle emission changes associated with changed traffic flows should be checked against any potential for construction over-runs, taking works beyond the two year mark.*" At statutory consultation, held in held between October and December 2023, the local authorities and the Environment Agency were consulted on the Preliminary Environmental Information Report (PEIR). This included air quality information. The local authorities had an opportunity to respond to the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Preliminary Environmental Information on air quality. Responses in relation to the statutory consultation undertaken are presented in the Consultation Report (**TR010066/APP/5.1**) and in Annex M (**TR010066/APP/5.2**). The only response from local authorities regarding air quality was from Rugby Borough Council, who wanted to ensure that 'Air Quality Supplementary Planning Document (2021)' (this document supplements Policy HS5 of the Rugby Local Plan (2019)) was referenced. The Environment Agency did not raise and comments on air quality. Both Coventry City Council and Rugby Borough Council were contacted in March 2024 to obtain the most recent local authority air quality monitoring data for 2023. Unfortunately, results for 2023 were not made available at the time of writing (March 2024) by either council. No further consultation was deemed to be required with regard to the air quality assessment. The mitigation proposed is consistent with best practice guidelines, including Environment Agency guidance (Air Quality Technical Advisory Group AQTAG, 2014) and the outcome of the assessments undertaken follows DMRB guidelines.
Mitigation		
5.123	The Secretary of State should ensure the applicant has provided sufficient information to show any necessary mitigation will be put in place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke and artificial lighting from the development to reduce any loss of amenity which might arise during construction and operation of the development. This should be detailed within a Statement Relating to Statutory Nuisance.	See response to NPS NN paragraphs 5.120. With the application of best practice construction mitigation measures, as included in the Scheme's EMP (**TR010066/APP/6.5**), the impact of construction dust is unlikely to trigger a significant air quality effect. The First Iteration EMP will be developed into a Second Iteration EMP for implementation during construction of the Scheme. Details on the First and Second Iteration EMPs, including how mitigation is secured within the draft DCO (**TR010066/APP/3.1**), is provided within ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**). The Second Iteration EMP is secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		A Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) is submitted as part of the Application. This concludes that with mitigation in place, none of the statutory nuisances identified in Section 79(1) of the Environmental Protection 1990 Act are predicted to arise during the construction or operation of the Scheme
Decision-making		
5.124	The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, landscapes and protected species and habitats, using directed light when necessary.	See response to NPS NN paragraphs 5.120. The potential effects of lighting have been identified as part of a landscape and visual impact assessment reported in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**), which also details the methodology followed. ES Appendix 7.5 Lighting Assessment (**TR010066/APP/6.3**) also provides an analysis and assessment of the potential lighting effects on sensitive receptors. The Lighting Assessment (**TR010066/APP/6.3**) states that due to the mitigation measures outlined within Section 8 of the report, the residual effects of the operational phase are assessed to be Neutral. This is due to the low potential for obtrusive light to affect human and ecological receptors, through the implementation of the lighting layout. Potential human sensitive receptors located outside the boundaries of the Scheme are unlikely to be subjected to obtrusive light from the Scheme, due to the design of the lighting for the Scheme. In combination, the design implementation seeks to ensure that light is only focussed where it is needed, and the layout of the Scheme including the vegetation will provide shielding to sensitive receptors from the effects of obtrusive light. This will help reduce the potential for the levels of glare and light spill to be greater than those permitted. Lighting levels following the application of the mitigation measures outlined in Section 8 are not expected to exceed limitations on light pollution, as reasonable steps have been taken to minimise light pollution wherever possible.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Further to this, lighting levels following the application of the mitigation measures outlined in Section 8 and the implementation of the lighting layout presented in Annex A are expected to comply with necessary guidance presented in ILP GN01:2020, PLG04, and GN08-23; meeting the tests identified for this installation. In conclusion, lighting levels associated with the Scheme will be sympathetic to the surroundings and consist of the lowest possible lighting levels whilst meeting relevant British Standards. As such, there will be no significant effects from artificial lighting installed as part of the Scheme. No streetlighting on the A46 mainline will have a positive effect for bats commuting along and across the A46 and for other species on site (including birds, badger and other mammals) The Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) also shows how artificial light is considered as part of the Scheme. With the application of mitigation measures in the First Iteration EMP (**TR010066/APP/6.5**), it is considered that no statutory nuisance would arise during construction, nor would it be prejudicial to health under Section 79(1)(fb) of the EPA.
5.125	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the Development Consent Order.	See response to NPS NN paragraphs 5.120. The Statement Relating to Statutory Nuisance (**TR010066/APP/6.6**) has been submitted in accordance with the Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities) guidance 'Planning Act 2008: Application Form Guidance' (June 2013) and in compliance with Regulation 5(2)(f) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the "2009 Regulations") which requires: *"…a statement whether the proposal engages one or more of the matters set out in section 79(1) (statutory nuisances and inspections thereof) of the Environmental Protection Act 1990, and if so how the applicant proposes to mitigate or limit them".*

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The construction and operational activities that have the potential to create a nuisance would be controlled through mitigation as set out in the First Iteration EMP (**TR010066/APP/7.5**). Mitigation measures are also set out within the following chapters of the ES (**TR010066/APP/6.1**): • Chapter 5: Air Quality • Chapter 6: Cultural Heritage • Chapter 7: Landscape and Visual Effects • Chapter 8: Biodiversity • Chapter 9: Geology and Soils • Chapter 10: Material Assets and Waste • Chapter 11: Noise and Vibration • Chapter 12: Population and Human Health • Chapter 13: Road Drainage and the Water Environment • Chapter 14: Climate • Chapter 15: Combined and Cumulative Effects The First Iteration EMP would be developed into a Second Iteration EMP for each part for implementation during construction and is secured through Requirement 4 of the draft DCO (**TR010066/APP/3.1**). A Third Iteration EMP will be submitted and approved by the Secretary of State following consultation, secured through Requirement 5 of the draft DCO (**TR010066/APP/3.1**). With mitigation in place, none of the statutory nuisances identified in Section 79(1) of the EPA are predicted to arise during the construction or operation of the Scheme.
Flood Risk		
Applicant's Assessment		
5.131	Applications for projects in the following locations should be accompanied by a Flood Risk Assessment: • applications in Flood Zones 2 and 3, which represent a medium and high probability of river and sea flooding	The EIA process undertaken for the Scheme included preparation of a Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)). The FRA is discussed further in response to NPS NN paragraph 5.133, below.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• applications in Flood Zone 1 which represent a low probability of river and sea flooding involving sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in the future; or land that may be subject to other sources of where its development would introduce a more vulnerable use.	
5.132	The Flood Risk Assessment should identify and assess the risks of all forms of flooding and coastal erosion to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) assesses the risk of flooding to and from the project, taking into account the effects of climate change. The majority of the Scheme lies within Flood Zone 1; however, where areas lie within Flood Zones 2 and 3. Scheme specific hydraulic modelling has been undertaken, as detailed in the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) to determine the fluvial flood risk post development. This model demonstrates that there is no flooding of the carriageway during the 1 in 100 year plus 32% climate change event. The Scheme also does not result in adverse changes in flood risk offsite. Coastal erosion is not relevant to this scheme.
5.133	In preparing a Flood Risk Assessment, the applicant should: • consider the risk of all sources of flooding arising from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed, and where relevant, mitigated, so that the development remains safe throughout its lifetime • take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made • demonstrate how residual risks from reservoirs will be safely managed and mitigated • consider the vulnerability of those using the infrastructure including arrangements for safe access and escape • include the assessment of the remaining (known as residual) risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed	Design considerations, mitigation measures and residual risks are described in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), supported by detailed studies in ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**). • ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) assesses the risk of all sources of flooding arising from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project. • See the response to 5.132. In terms of lifetime of the Scheme, this is considered to be 100 years and in relation to the vulnerability of the Scheme, it is considered to be essential infrastructure. • Coombe Pool is a 32-hectare (ha) large raised reservoir under the Reservoirs Act 1975, located 150m to the east of the Scheme. The

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• consider if there is a need to remain operational during a worst-case flood event over the development's lifetime • provide the rationale for the Secretary of State on application of the Sequential Test and Exception Test, as appropriate.	combined effect of the A46 Northbound carriageway and the B4082 ensures the proposed highway is above existing for the full extent of the location of a Coombe Pool reservoir breach. During a reservoir breach, the hardtop of the highway will form a barrier to flow. In the vicinity of Coombe Pool, the proposed highway levels are above that of existing. Therefore, the Scheme does not increase the residual risk of reservoir flood risk due to lowering of the highway embankment. Further details are provided in Section 8.7 of ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**). • In the post-construction scenario the A46 will ensure users are not exposed to hazardous flooding for the 1% AEP plus climate change fluvial event and be of sufficient height to provide continued protection downstream for the 1% AEP plus climate change fluvial level. • The inclusion of the clay layer will help to reduce the likelihood of the A46 becoming significantly breached and hopefully give CCC additional time to implement the emergency plan. This emergency plan should include measures (including warnings and alerts) to enable National Highways to manage traffic flows (potentially including closure of appropriate sections of the A46) to reduce the risk of users of the Scheme. However, as in the baseline scenario this remains a residual risk. • The ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) provides the application of Sequential and Exception Tests. It is determined through the assessment that the Scheme passes the sequential test and that the Scheme will be safe for its lifetime and will not increase flood risk elsewhere. This is achieved through: ○ ensuring the A46 southbound embankment remains set above the 1% plus climate change flood level ○ improvements to the structure of the A46 southbound embankment to enable it to act as a secondary defence ○ inclusion of SuDS to manage the surface water runoff from the additional areas of hardstanding.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The location of the Scheme is fixed, as a result of a need to improve the existing A46 strategic road network corridor to provide alternative routes away from congestion. Due to this, there are no reasonably available, lower-risk sites, suitable for the proposed development, to which the development could be steered. Therefore, the Scheme has been identified as the only applicable site and has passed the sequential test. The Scheme is classified as essential infrastructure with areas along the B4082 within Flood Zone 3b, therefore in accordance with the National Planning Policy Framework flood risk vulnerability and Flood Zone compatibility assessment an exception test is required. The exception test requires the following elements to be satisfied (as set out in the Flood Risk and Coastal Change Planning Practice Guidance): • development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk • the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The first part of the exception test is considered to be passed as the Scheme will upgrade the existing Walsgrave Junction to alleviate congestion and improve journey times along the A46 corridor. In turn, this will provide multiple socio-economic benefits for communities and businesses within the wider area, as set out in the Case for the Scheme (**TR010066/APP/7.1**). The Scheme also provides a range of environmental benefits which are detailed throughout the ES (**TR010066/APP/6.1**). The second part of the exception test is addressed within the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)), which determined that the Scheme will be safe for its lifetime and will not increase flood risk elsewhere.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.134	Applicants for projects which may be affected by, or may add to, flood risk should seek sufficiently early pre-application discussions, before the official pre-application stage of the NSIP process with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers and local highway authorities. Such discussions can be used to identify the likelihood and possible extent and nature of the flood risk, to help scope the Flood Risk Assessment, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, before the application for development consent is submitted.	Details of pre-application discussions with the Environment Agency and the LLFAs are set out in Section 5 of the Flood Risk Assessment (ES Appendix 13.1) (**TR010066/APP/6.3**)). There are no Internal Drainage Boards relevant to the Scheme. ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**)), sets out that consultation with the Environment Agency was undertaken on the 17 November 2023 and is ongoing. The consultation has included a discussion on the pluvial and fluvial flood risk elements across the Scheme, along with the proposed surface water drainage design. In relation to the approach to the FRA, it was agreed that no changes from the options selection stage baseline model were required and that the peak river flow higher central (32%) climate change allowance would be used for the design of any structures and central (21%) climate change allowance would be used for flood compensatory storage (if required). The Environment Agency stated they had no issues or concerns and agreed with the approach proposed. It was agreed during consultation that the Environment Agency did not have any issues or concerns with the pluvial and fluvial flood risk elements across the Scheme or the proposed surface water drainage design. Consultation with the Environment Agency, and the LLFAs remains on-going and focuses on agreeing the impacts and mitigation requirements of the Scheme, an update will be provided in the relevant Statements of Common Ground, which will be submitted at DCO Examination. Sewerage undertakers have not been consulted as there will no connections to mains/ sewers etc). However, discussions around protective provisions are now being progressed for works near sewers. Seven Trent Water provided a response to the Scoping Report (**TR010066/APP/6.8**), and this has been addressed in ES Appendix 4.1 (Scoping Opinion Response) (**TR010066/APP/6.3**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.135	For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example, flow routes should be clearly identified and managed.	See response to NPS NN paragraph 5.133. Local plans, policies and strategies have been considered as detailed in Table 13-3 of ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**). ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) addresses the risk of all forms of flooding including surface water. The drainage strategy (ES Appendix 13.6 Drainage Strategy Report) (**TR010066/APP/6.**3) details the measures proposed to store and convey water from the site.
5.136	Proposals should prioritise the use of Sustainable Drainage Systems unless there is clear evidence that this would be inappropriate. A drainage strategy should also be produced and submitted as part of the Flood Risk Assessment	A Drainage Strategy has been developed for the Scheme (ES Appendix 13.6 Drainage Strategy Report) (**TR010066/APP/6.3**) that aims to reduce the impact of pluvial flood risk through the use of SuDS. Adverse impacts due to changes in water quality during the operational phase would be mitigated for by the drainage design, which includes proposed filter drains and SuDS, as detailed within ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**). Two of the proposed drainage features would be designed to be permanently wet ponds and planted with aquatic species. The drainage strategy ensures that surface water flow routes are managed within the Scheme and would not pose an increase in surface water flood risk to others. Refer to Section 8.3 of the Flood Risk Assessment (ES Appendix 13.1) (**TR010066/APP/6.3**). The Drainage Strategy is also captured in items RD1-RD9 of the REAC (Annex A of the First Iteration EMP (**TR010066/APP/6.5**)).
5.137	The term Sustainable Drainage Systems is taken to cover the whole range of sustainable approaches to surface water drainage management including: • source control measures including rainwater recycling and drainage • use of Sustainable Drainage Systems Management Trains to improve water quality	See response to NPS NN paragraph 5.136. ES Appendix 13.6 (Drainage Strategy Report) (**TR010066/APP/6.3**) has taken into account all the criteria within the bullet points.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed • basins and ponds to hold excess water after rain and controlled discharge that avoids flooding • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding. A	
Mitigation		
5.138	To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of Sustainable Drainage Systems, but could also include vegetation to help slow runoff, hold back peak flows and make landscapes more able to absorb the impact of severe weather events.	The Scheme incorporates the necessary measures to manage flood risks, including by: • ensuring the A46 southbound embankment remains set above the 1% plus climate change flood level • improvements to the structure of the A46 southbound embankment to enable it to act as a secondary defence • inclusion of SuDS to manage the surface water runoff from the additional areas of hardstanding. Please refer to ES Chapter 14 (Climate) (**TR010066/APP/6.1**) and ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**)).
5.139	Site layout and surface water drainage systems should cope with events the exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	The vulnerability of the Scheme to climate change and the resilience of the Scheme to climate change impacts and associated weather effects, including how the Scheme will take account of the projected climate change has been assessed (see ES Chapter 14 (Climate) (**TR010066/APP/6.1**) and ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**)). These assessments have informed the design so that sufficient capacity has been incorporated. See response to NPS NN paragraph 5.136.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.140	The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project unless specific off-site arrangements are made and result in the same net effect.	The Drainage Strategy Report (ES Appendix 13.6) (**TR010066/APP/6.3**) summarises that surface water outfalls will be regulated to be comparable to existing conditions.
5.141	If there are no viable Sustainable Drainage Systems options available, it may be necessary to provide surface water storge and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside of the project site, if necessary, through the use of a planning obligation.	See response to NPS NN paragraph 5.138
5.142	The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located in parts of the site with lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken forward to lower flood risk by improving flow routes, flood storage capacity and using Sustainable Drainage Systems.	See response to NPS NN paragraphs 5.132, 5.133 and 5.134. The mitigation presented on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) has been designed holistically to include a number of benefits for the Scheme and the natural environment, this includes creation of habitat including scrub, grassland, woodland and three drainage features two of which would be designed to be permanently wet ponds and planted with aquatic species, representing nature-based solutions incorporated into the Scheme. This is also discussed in section 13.10 of ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and set out in the Drainage Strategy (ES Appendix 13.6 (**TR010066/APP/6.3**)).
Decision-making		
5.143	Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant: • the application is supported by an appropriate Flood Risk Assessment • the Sequential Test has been satisfactorily applied as part of the site selection and, if required, the Exception Test.	See the response to NPS paragraph 5.133.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.144	The Secretary of State should not consent development in flood risk areas (including flood zones 2 and 3 and locations at risk of flooding from local watercourses, surface water, groundwater or reservoirs) accounting for the predicted impacts of climate change unless they are satisfied that the sequential test requirements have been met. In addition, the Secretary of State should not consent development in Flood Zone 3 unless they are satisfied that both the Sequential and Exception Test requirements have been met.	See the response to NPS paragraph 5.133.
5.145	When determining an application, the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider development appropriate in areas at risk of flooding where (informed by a Flood Risk Assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that: • within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location • development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of Sustainable Drainage Systems.	The Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) identifies that the Scheme will be safe for its lifetime and will not increase flood risk elsewhere. The Scheme location is fixed based on the existing junction for improvement and flood management measures have been incorporated into the design, as outlined in the response to NPS NN paragraph 5.133.
5.146	In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Flood Zone 3b should result in no net loss of floodplain storage and not impede water flows.	As set out in Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)), the proposed A46 southbound carriageway level of at least 74.0mAOD is maintained the full length of the Scheme design. This ensures no flooding of the carriageway itself during the design event and ensures the Scheme adheres to DMRB LA 113 standard. The proposed southbound embankment will be graded to existing slope or shallower and ensures no net gain in material below the design level. Therefore, there is no loss of floodplain and thus flood compensatory storage is not required for the Scheme.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.147	If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not do so that all reasonable steps have been taken by the applicant and the Environment Agency to try and resolve the concerns.	See response to NPS NN paragraph 5.134.
5.148	The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure and others. However, the nature of linear infrastructure means that there will be cases where: • upgrades are made to existing infrastructure in an area at risk of flooding • infrastructure in a flood risk area being replaced • infrastructure is being provided to serve a flood risk area • infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area.	See response to NPS NN paragraph 5.133, 5.134 and 5.138.
5.149	The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area while also offering opportunities to enhance biodiversity. It should be demonstrated that there is no increase in flood risk elsewhere. In such cases the Secretary of State should take account of any positive benefit to placing linear infrastructure in a flood-risk area.	The majority of the Scheme lies within Flood Zone 1; however, where areas lie within Flood Zones 2 and 3, a Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) has been prepared to assess the flood risk arising from the Scheme. Scheme specific hydraulic modelling has been undertaken, as detailed in the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) to determine the fluvial flood risk post development. This model demonstrates that there is no flooding of the carriageway during the 1 in 100 year plus 32% climate change event. The Scheme also does not result in adverse changes in flood risk offsite. This is achieved through: • The embankment adjacent to the A46 southbound carriageway at Coombe Pool is maintained at a level of at least 74.0mAOD (the 1 in 100 year plus 32% climate change plus 0.6m freeboard). This was set out in ES Appendix 13.1 Flood Risk Assessment and ensures no flooding of the carriageway itself and ensures the

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		Scheme adheres to DMRB LA 113 guidance for projects on motorways. • The proposed A46 southbound embankment will be graded to the existing slope or steeper and ensures no net gain in material below the design level. Therefore, there is no requirement for compensatory flood storage. • The minimum carriageway levels for the section adjacent to Coombe Pool are maintained, this will ensure there is no change to the reservoir flood risk, in the event of failure of the dam (a residual risk scenario). Vegetation is removed on the embankment and woodland cannot be replaced in this location due to the requirement to maintain sight lines around the bend of the highway. The embankment is also being lined with clay to prevent seepage/stability. Replacement planting is provided in the mitigation area as shown on the Environmental Masterplan (ES Figure 2.4) (**TR010066/APP/6.2**) and detailed in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**).
5.150	Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation measures to have been made, to ensure that infrastructure remains functional in the event of predicted flooding.	See response to NPS NN paragraphs 5.133 and 5.149.
5.151	For construction works that have drainage implications approval for the project's drainage system will form part of any development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with Technical Standards published by Ministers. In addition, any Development Consent Order, or associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems, including necessary access rights to property. Sustainable Drainage Systems should deliver multifunctional benefits and help to achieve biodiversity net gain. The Secretary of State should be satisfied that the most appropriate body is being given responsibility for maintaining any Sustainable Drainage Systems, taking into account the nature and security of the infrastructure on the	See response to NPS NN paragraphs 5.133 and 5.149. Multifunctional benefits of proposed mitigation enhancement include: • Adverse impacts due to changes in water quality during the operational phase would be mitigated for by the drainage design, which includes proposed filter drains and three drainage basins (SuDS), as detailed within ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**). Two of the proposed drainage basins would be designed to be permanently wet and planted with aquatic species.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority and the relevant Sustainable Drainage Systems Approval Body or another body such as the Internal Drainage Board. Where infiltration type Sustainable Drainage Systems are proposed, pre-applications with the Environment Agency are recommended to ensure they do not cause pollution to surface and groundwater quality and applicants should consider the role of Sustainable Drainage Systems management trains to control and treat run-off	• Marginal Planting in SuDS Area: Helps to compensate for biodiversity loss due to the development of the Scheme. Creates additional habitats that support a variety of species. Enhances water filtration and retention, helping to manage stormwater and reduces flooding risks. Given the absence of permanently wet aquatic habitat within the Order Limits, the creation of a permanently wet retention basin is considered an enhancement for aquatic invertebrates, common amphibians and potentially otter, water vole and great crested newt should these species colonise. Details of maintenance of the Schemes ecological and drainage features are provided in the First Iteration EMP (**TR010066/APP/6.5**). The water quality pond to the north of the Scheme will be maintained by the Applicant, National Highways, and the other attenuation pond will be maintained by Coventry City Council. Filter drains and ditches will be managed by both Coventry City Council and the Applicant, depending on where their location. Agreements will be put in place with Coventry City Council for the ongoing maintenance of these drainage features. Following the Secretary of State's approval of the DCO for the Scheme, the First Iteration EMP (**TR010066/APP/6.5**) will be updated, a minimum of two times, to reference specific requirements relating to the various phases of construction. A Landscape and Ecology Management Plan (LEMP) will be prepared as part of the Second Iteration EMP secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). Details of pre-application discussions with the Environment Agency and the LLFAs are set out in Section 5 of the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)). It was agreed during consultation that the Environment Agency did not have any issues or concerns with the pluvial and fluvial flood risk elements across the Scheme or the proposed surface water drainage design. Consultation with the Environment Agency, and the LLFAs remains on-going and focuses on agreeing the impacts and mitigation requirements of the

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Scheme, an update will be provided in the relevant Statements of Common Ground, which will be submitted at DCO Examination.
Land contamination and instability		
Applicant's assessment		
5.154	Where necessary, land contamination and instability should be considered in respect of new development. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land contamination or instability. If land instability and/or land contamination may be an issue, applicants should seek appropriate and technical and environmental expert advice from a competent person to prepare and carry out the appropriate assessments. Applicants should consult with the Coal Authority, Environment Agency and Local Authority if necessary.	ES Appendix 9.3 (Ground Investigation Report) (**TR010066/APP/6.3**) accompanies ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**). A review of the existing geology and soil baseline conditions, consideration of the potential impacts, identification of proportionate mitigation and identification of residual effects caused by the Scheme is set out ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**). Ground conditions including land contamination and risks from natural hazards are included within the baseline section of this Chapter. Mitigation for any land contamination and geological risks are included, where required, in the mitigation section of this Chapter. Only minor evidence of contamination from historical activities were recorded during the site investigation and no special remedial activities are recommended for the Scheme. Minor impact from ground contamination was identified in the ground investigation work and hence there is limited potential for construction activities to mobilise contaminants within the underlying soils or introduce contaminants which may potentially harm human health or environmental receptors such as Smite Brook and Coombe Pool. Potentially harmful construction activities will be identified, controlled and mitigated by measures set out in the First Iteration EMP (**TR0/10066/APP/6.5**) and will be detailed in the Second Iteration EMP and via the detailed design of the Scheme. Groundwater monitoring readings recorded to date suggest that groundwater is relatively high in all areas where cuttings are proposed. It is currently unclear how high groundwater levels may be over time because monitoring readings are currently only available for the period between June and August 2023. There is therefore no data available to assess possible seasonal fluctuations in groundwater levels.

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		It is therefore possible that groundwater control measures will be required for the construction of all cuttings. In addition, groundwater control measures such as slope drains may be required to mitigate the risk of instability posed by groundwater levels during the operational phase of the Scheme. This assessment set out ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**) uses Environment Agency (2023) Land Contamination Risk Management (LCRM) guidance to assess risks posed to human health and the environment. Consultation with relevant statutory bodies and the local authority is set out in ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**) section 9.4. An Environmental Scoping Report was submitted to the Planning Inspectorate in June 2023 (**TR010066/APP/6.8**). A Scoping Opinion was received in response to the Scoping Report (2023) (**TR010066/APP/6.9**). The Applicant's responses to the Scoping Opinion are contained in the Scoping Opinion Response (ES Appendix 4.1) (**TR010066/APP/6.3**). Responses in relation to the statutory consultation undertaken are presented in the Consultation Report (**TR010066/APP/5.1**) and the Consultation Report Annexes (**TR010066/APP/5.2**). Comments pertaining to waste and reuse including those relating to the former landfills in the northern and southern extents of the Scheme have been included in this assessment in ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**). Further comment on the waste is contained within ES Chapter 10 (Material Assets and Waste) (**TR010066/APP/6.1**). Further direct consultation for geology and soils has not been required during the assessment stage. Where required consultation will be undertaken at the detailed design stage with the Environment Agency and the local authorities They Coal Authority were consulted at statutory consultation as a prescribed consultee. They provided a response as detailed in Annex M of the Consultation Report (**TR010066/APP/5.2**). They identified that whilst the site falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority. On this basis the Planning team at the Coal

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Authority had no comments to make. It has not been necessary to consult the Coal Authority further on this Scheme.
5.155	For developments on previously developed land, applicants should ensure and demonstrate they have considered the risks posed by land contamination in accordance with Land Contamination Risk Management guidance. A preliminary assessment of land contamination and/or ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared.	See response to paragraph 5.154. The majority of the Scheme is on previously developed land, as it uses the location of the existing A46, although certain areas of the Scheme are on agricultural land, such as the new western dumbbell. The Land Contamination Risk Management guidance has been considered in the assessment in ES Chapter 9 Geology and Soils (**TR010066/APP/6.1**). The Chapter has considered the risks posed by land contamination. A Hierarchy of Screening Criteria for Generic Quantitative Risk Assessment has been undertaken and the findings presented in ES Appendix 9.1 (**TR010066/APP/6.3**). No active or recently active landfills have been identified within a 250m radius of the Scheme. ES Chapter 9 Geology and Soils (**TR010066/APP/6.1**) identifies proportionate mitigation and residual effects. Mitigation measures are set out in the First Iteration EMP REAC (**TR010066/APP/6.5**) and will be detailed in the Second Iteration EMP secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). A Staged Overview of Assessment Report (SOAR) for the Scheme was produced in 2022 which provided an overview of the development of Walsgrave junction, and a summary of the technical work completed at option selection. This report considered high-level constraints that had significant potential to affect the delivery of the project, which included contamination. A Ground Investigation was said to be required in the SOAR for the chosen option (Option 11) to reduce uncertainty over variable ground conditions, groundwater levels, contaminants and unexploded ordnance (UXO). A PEIR was produced in October 2023 to support the statutory consultation This PEIR was based on the environmental information available at the time and considered land contamination and/or ground instability.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.156	Applicants should ensure that any necessary investigations are undertaken in accordance with the Land Contamination Risk Management guidance, to ascertain the risk from contamination and identify sensitive receptors and that their sites are, and will, remain stable or can be made so as part of the development. The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.	See response to NPS NN paragraph 5.154. ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**) has considered Land Contamination Risk Management guidance as detailed in section 9.3 to assess risks posed to human health and the environment. Geological resources and potential land contamination have been taken account of in this assessment, through a combination of desk studies, sampling through ground investigations, and subsequent assessment, in order to identify the likely significant effects. The assessment of the effects of contamination on the identified receptors has been informed by a ground investigation completed in 2023. The ground investigation and the findings are reported in ES Appendix 9.3 (Ground Investigation Report) (**TR010066/APP/6.3**). The potential contaminated land risks are addressed through assessment of the ground investigation results. The Scheme has been assessed in the context of the surrounding environment as shown in Table 9-8 of ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**). Within DMRB LA 109, impacts on geology and soils are assessed by qualitative comparison, evaluating the value (sensitivity) of particular receptors impacted by the Scheme and assessment of the magnitude of that impact. The receptor value, classes and the range of magnitude criteria are also set out in DMRB LA 109. The assessment of the effects of contamination on the identified receptors has been informed by a ground investigation completed in 2023. Effects on groundwater during construction and operation of the proposed development are assessed in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**). The criteria for assessing value of receptors and the magnitude of impact to these receptors is presented in Table 9-4 and Table 9-5 in accordance with

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		DMRB LA 109 Geology and soils and DMRB LA 113 Road drainage and water environment (Highways England, 2020).
Mitigation		
Instability		
5.157	Applicants have a range of mechanisms available to mitigate and minimise the risk of land instability. These include: • establishing the principle and layout of new development, for example avoiding mine entries and other hazards • ensuring proper design of structures to cope with movement expected, and other hazards such as mine and / or ground gases • requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material, for development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource	See response to NPS NN paragraph 5.154. ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**) identifies proportionate mitigation and residual effects. Mitigation measures are set out in Appendix A REAC of the First Iteration EMP (**TR010066/APP/6.5**) and will be detailed in the Second Iteration EMP secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1***).* Management plans included in the First Iteration EMP (**TR010066/APP/6.5**) which include the following: • EMP Appendix B.3 Outline Site Waste Management Plan • EMP Appendix B.4 Outline Landscape and Ecology Management Plan The Second Iteration EMP will be produced which reflect the mitigation measures required by the REAC (Appendix A of the First Iteration EMP (**TR010066/APP/6.5**)) and set out in the ES and includes various management plans and method statements. This is secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**). Management plans to be included • Materials Management Plan; • Site Waste Management Plan; • Soil Handling Management Plan.
5.158	Applicants should submit a coal mining risk assessment as part of their application in specific Development High Risk areas.	The Coal Authority's Interactive Map Viewer [7] indicates that the Study Area is within the Coal Authority's Mining Reporting Area. The Preliminary Sources Study Report (PSSR) identifies one substantial claim regarding subsidence damage in 1995. However, it has been concluded that, because of the nature, location, and age of the claim, mining risk is negligible within the site area.
Land Contamination		

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.159	Applicants have a range of options available to mitigate and minimise risks of land and groundwater contamination • these options should include sustainable remediation, sustainable remediation can provide the opportunity to manage unacceptable risks to human health and the environment, it can help ensure that the benefit of doing the remediation is greater than its impact • in accordance with the Environmental Improvement Plan, disposal of soils to landfill should be minimised	See response to NPS NN paragraph 5.154. ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**) identifies proportionate mitigation and residual effects. Mitigation measures are set out in the First Iteration EMP REAC (**TR010066/APP/6.5**). Following the Secretary of State's approval of the DCO for the Scheme, the First Iteration EMP will be updated, a minimum of two times, to reference specific requirements relating to the various phases of construction. The following management plans will be prepared as part of the Second Iteration EMP secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1***).* • Site Waste Management Plan (SWMP) • Materials Management Plan (MMP) (if required) • Soil Handling Management Plan
Landscape and visual impacts		
Applicant's assessment		
5.161	The applicant should carry out a landscape and visual impact assessment. A number of guides have been produced to assist in addressing landscape issues, for example, the third edition of Guidelines for Landscape and Visual Impact Assessment (GLVIA3) published by the Landscape Institute. The landscape and visual assessment for the proposed project should include the impacts during construction and operation, and reference to any landscape character assessments. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England. For seascapes, applicants should consult the Seascape Character Assessment and the Marine Plan Seascape Character Assessments, and any successors to them.	ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) presents the findings of the Landscape and Visual Impact Assessment (LVIA) including baseline conditions, the potential impacts of the Scheme upon surrounding landscape and visual receptors and identification of appropriate mitigation. The methodology for the LVIA is set out in Section 7.5 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). The LVIA is undertaken in accordance with DMRB LA 107 and comprises: • Identification of landscape and visual receptors and a description of existing baseline conditions. • An assessment of the sensitivity of the receptors to change (taking account of both receptor susceptibility and receptor value). • An assessment of the potential impacts associated with the Scheme, i.e. the ways that the Scheme would alter the baseline landscape and visual conditions. • An assessment of the magnitude of change to the receptor (considering the scale, extent, duration, and potential reversibility of the change).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• Identification of measures to mitigate adverse landscape and visual effects. • Report on the residual landscape and visual effects once mitigation has been considered including an assessment of the level and significance of the effect on the receptor. The LVIA also takes account of local development plan policies in respect of landscape and visual effects. Coventry City Council have no published landscape character assessments relating to the study area. The following report was produced in conjunction of Warwickshire County Council and Rugby Borough Council: Landscape Assessment of the Borough of Rugby Sensitivity and Condition Study (Warwickshire County Council and Rugby Borough Council, 2006). The aim of the study was to examine the landscape around Rugby in terms of sensitivity, and condition undertaking a broad-based landscape character assessment of Rugby. Following a site visit and a review of published landscape character information, both national and local, it has been determined that the study area consists of four distinctive local landscape character areas. For the purposes of this assessment these four areas have been defined as Project Landscape Character Areas (PLCA) (paragraphs 7.8.6 to 7.8.16 of this assessment). The assessment approach comprises a desktop study and site survey. Its purpose is to establish the nature and extent of potential receptors, to identify the likely sensitivity of receptors, and to record the potential landscape and visual effects of the Scheme on the receptors. The LVIA considers likely significant landscape and visual effects within Section 7.11 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) The LVIA considers both construction and operational phase impacts and includes an assessment of likely significant effects on key visual receptors, representative viewpoints, landscape character areas, residential properties, PRoW and community facilities. Effects are considered over a 15-year period

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		of operation (see ES Chapter 7 (Landscape and Visual Effects) Section **7.9** (**TR010066/APP/6.1**)).
5.162	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project, potential impacts on views (including protected views) and visual amenity. This should include any noise and/or light pollution effects, including on local amenity, dark skies, tranquillity and nature conservation. The assessment should also demonstrate how noise and/or light pollution from construction and operational activities on residential amenity, sensitive locations and other receptors will be minimised. The assessment should also consider identified special qualities for National Parks, the Broads and Areas of Outstanding Natural Beauty (now known as National Landscapes) (as set out in the management plans for these designations).	The LVIA considers both construction and operational phase impacts and includes an assessment of likely significant effects on key visual receptors, representative viewpoints, landscape character areas, residential properties, PRoW and community facilities. It also considers the effect on night-time effects. Effects are considered over a 15-year period of operation (see ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**)) Section 7.11 of ES Chapter 7 considers likely significant visual effects during both construction and operation, as required in DMRB LA 107. The assessment of landscape and visual effects includes consideration of both day and night-time conditions. However, as agreed in the Scoping Opinion (**TR010066/APP/6.9**) given the urban-edge location of the Scheme; the limited number of sensitive visual receptor locations with open views and the presence of existing night-time traffic movements on the existing A46, significant visual change is unlikely to occur due to night-time visibility and a night-time site visit and viewpoint assessment is not considered necessary as part of the LVIA for this Scheme. Effects relating to noise are included within ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**). Effects relating to nature conservation are included within ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**). Effects on human health is included within ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**). This Chapter states that changes to noise and vibration during construction and operation, including changes to tranquillity in relation to impacts on human health has been assessed determine health outcomes for the populations in Revel and Binley Woods, Henley and Wyken wards. During construction effects of noise and vibration from construction plant and vehicles on communities and residential receptors, could affect tranquillity.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Mitigation is described in Section 7.10 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) and included in the REAC within Appendix A of the First Iteration EMP (**TR010066/APP/6.5**). **Potential impacts** During operation, there are potential effects due to the change in road traffic noise resulting from the Scheme. The effects associated with road traffic noise are not significant for most receptors of the Scheme. For receptors within buildings, there are minor adverse and beneficial impacts in the long term however absolute noise levels remain below the Significant Observed Adverse Effect Level (SOAEL), (including residential receptors off Valencia Road) resulting in a minor or negligible not significant effect. *Changes in tranquillity* Tranquil environments within green / open space are thought to benefit peoples' health and wellbeing, providing calm spaces in what may be otherwise busy environments. It is therefore important to protect and retain the tranquillity of these spaces. During operation, there is the potential for changes in tranquillity at areas of green/ open space. These spaces comprise: • Stoke Floods Nature Reserve • Coombe Abbey Park • Play park to the west of the A46 (Valencia Road) • Play park to the west of the A46 (Hepworth Road) • Clifford Bridge Academy School • Footpath to the north of the Scheme (PRoW) • Footpath along the River Sowe (informal path) • Footpath along Smite Brook (informal path) It has been determined that during the long term, for all noted areas of green/ open space, the change in noise level would be less than 2.9 decibels and therefore in line with DMRB LA111, this would be a minor magnitude of impact.

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		However, compared with the long-term change without the Scheme in place, there is no change as a result of the Scheme. Therefore, it is not considered that there would be changes in noise levels as a result of the Scheme that would affect tranquillity at these receptors. There is a small area close to the road within Coombe Abbey Park with a slightly higher increase in noise levels (3.0- 4.9 dB) however this is to the west of the footpath. **Mitigation** As the noise level changes are not considered to significantly impact receptors during operation, no mitigation is identified as required. **Health outcomes** It is not considered that the Scheme would result in significant effects including on tranquillity at areas of green/ open space above the baseline. Therefore residual effects at receptors are considered to be non-significant. The overall the health outcome has been classified as Neutral.
5.163	Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in England's National Parks and the Broads, or National Landscapes, must comply with the duties in section 11A of the National Parks and Access Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000 as amended by Section 245 of the Levelling up and Regeneration Act 2023. Government planning policy advises that major development should not take place within these areas unless exceptional circumstances apply.	The Scheme does not affect land in England's National Parks, the Broads, or National Landscapes. There are none within the study area which for landscape and visual effects is 1km from the Order Limits and are beyond what would be considered for the setting for protected views.
Mitigation		
5.164	The project should be designed, and the scale minimised to avoid or where unavoidable to mitigate the visual and landscape effects, during construction and operation, so far as possible while maintaining the operational requirements of the scheme. In exceptional circumstances a reduction in operational requirements might be warranted, and the	The Scheme is a linear highway project and there is accordingly limited scope to reduce scale. To avoid, reduce or remediate (offset) potential effects on the landscape, embedded mitigation measures and essential mitigation measures for this aspect have been developed as presented within Section 7.10 of ES Chapter 7

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	Secretary of State may decide that the benefits to reduce the landscape effects outweigh the marginal loss of scale or function.	(Landscape and Visual Effects) (**TR010066/APP/6.1**). These are shown on ES Figure 2.4 Environmental Masterplan (**TR010066/APP/6.2**). Related design considerations are also presented in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**) and the Scheme Design Report (**TR010066/APP/7.4**). The evolution of the Scheme's design is described in Section 3 of the Case for the Scheme (**TR010066/APP/7.1**) and in the Scheme Design Report (**TR010066/APP/7.4**). The design has considered the adjacent landform and sought to minimise land take and intrusion. It also includes appropriate landscaping measures, to mitigate potentially harmful effects on views associated with the Scheme, which will be more effective as they mature. Landscape and visual related design interventions and mitigation associated with the Scheme are described in ES Chapter 7 (Landscape and Visual Effects) Section 7.10 (**TR010066/APP/6.1**). ES Chapter 7 (Landscape and Visual Effects), Section 7.11 (**TR010066/APP/6.1**) evaluates and assesses the residual effects of the Scheme on landscape and visual sensitivities following the design refinement process and application of mitigation and enhancement measure. **Construction** The majority of the Scheme and its immediate setting is located within PLCA 1 as such affected to the greatest degree, resulting in Large adverse (significant effect) at construction. In comparison to wider landscape character areas surrounding the Scheme (PLCA 2, 3 and 4); during and direct consequence of the construction stage would be a Slight adverse (not significant). Construction stage effects primarily result from the temporary presence of construction activities which comprise removal of existing vegetation, earthworks, and the introduction of new permanent features into the landscape, most notably the new grade separated junction and associated overbridge and works relating to the B4082 link road extension.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The largest construction phase effects on visual receptors, particularly residential receptors, and users of footpaths (promoted or local) would be associate with those locations in closest proximity to the construction activities with the Scheme. As such some visual receptors would be subject to Large adverse to Moderate adverse (significant) visual effects, as assessed through the representative viewpoints. Notable areas in which significant visual effects have been identified during construction are: • Representative viewpoint 1: Recreational users of public path to Coombe Abbey Park / PRoW (referenced R75x) and residential receptors at Farber Road/ Barrow Close, Walsgrave (Large adverse). • Representative viewpoint 13: Hungerley Hall Farm (Large adverse). **Operation** By Year 15 of operation, as the mitigation planting matures and reinstates key characteristics lost in PLCA 1, landscape changes due to the Scheme would have lessened and there would be an overall Neutral significance of effect. This reduction in significance reflects and balances the enhancements associated with new planting whilst also acknowledging some residual adverse effects of visible traffic movements (high-sided vehicles etc.) and related tall infrastructure elements (lighting, signage, or gantries) on the landscape character. A reduction in visual significance of effect after 15 years is demonstrated at representative viewpoints 1, 2 and 6 (Slight beneficial) as mitigation planting would be maturing and achieving a level of screening, with residual filtered visibility possible due to the height of associated highway infrastructure elements (lighting, gantries, or signage). Representative viewpoint 13 (Hungerley Hall Farm) at Year 15 of operation the Scheme would experience a Moderate adverse (significant) visual effect. Despite reinstated woodland belts along A46 realigned embankments reaching a level maturity; residual filtered visibility associated highway infrastructure elements (lighting, gantries, or signage) will still be possible due to their height.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		DMRB LA 107 requires that the combined effect of the Scheme on landscape and visual amenity as a whole is to be assessed independently and the outcome combined into a single conclusion on the overall likely significance of effect. Although acknowledging a small number of visual receptors in close proximity to the Scheme would experience a residual Moderate adverse (significant) visual effect (VP13), in the context and setting of the overall Scheme this would be relatively limited geographically. Having considered the residual (Year 15) landscape and visual assessments of effect, this assessment concludes that combining both landscape and visual effects, the Scheme would not result in a significant long term adverse residual effect on overall landscape and visual amenity but beneficial (Slight). Slight beneficial derives from the increase woodland blocks and hedgerow with tree planting along the embankment slopes along the A46 and B4082 link road, strengthening and improving the landscape character and visual amenity in comparison to the baseline scenario. An Outline Landscape and Ecological Management Plan (OLEMP) is included in the First Iteration EMP (**TR010066/APP/6.5**). The OLEMP has been prepared to help ensure the protection and management of landscape and ecological features, such as vegetation and habitats, during construction of the Scheme and the successful establishment of landscape and ecological mitigation including planting and seeding associated with the Scheme. The OLEMP would be updated to a Landscape and Ecological Management Plan (LEMP) by the Principal Contractor and included within the Second Iteration EMP, as appropriate and necessary, prior to commencement of works in accordance with Requirement 4 of the draft DCO (**TR010066/APP/3.1**). Related design considerations are also presented in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**).
5.165	Projects need to be designed carefully, taking account of the potential impact on the landscape. For projects with the potential to affect nationally designated landscapes the relevant management plan(s) for	See the responses to NPS NN paragraphs 5.164 - 5.165.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	these areas should be referred to for information to assist with the design of the scheme.	Landscape and visual related design interventions and mitigation associated with the Scheme are described in ES Chapter 7 (Landscape and Visual Effects) Section 7.10 (**TR010066/APP/6.1**). Section 7.8 states that there are no landscape designations within the Scheme study area therefore it would not affect any statutory or locally designated landscapes.
5.166	Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and topographical interventions (for example, creation of bunds or lowering of ground level). Also, landscaping schemes (including screening options and design elements that soften the built form such as green bridges), depending on the size and type of the proposed project. Materials and designs for infrastructure should always be given careful consideration in terms of environmental standards.	See the responses to NPS NN paragraphs 5.164 - 5.165. Appropriate siting of the Scheme and design is considered in the Scheme Design Report (**TR010066/APP/7.4**). The design fits within the built and landscape context and the Scheme is restrained, minimising impact on existing infrastructure and the environment. Design principles and objectives of the Scheme are considered in the Scheme Design Report - Sections 3 and 4 (**TR010066/APP/7.4**). Table 3-1 of the Scheme Design Report (**TR010066/APP/7.4**) demonstrates how the four NIC Design Principles are covered by the NH 10 Design Principles. Table 4-1 of the Scheme Design Report (**TR010066/APP/7.4**) sets out how the four NIC design principles have been applied to the Scheme. See also responses to NPS NN paragraphs 4.27 – 4.32.
5.167	Depending on the topography of the surrounding terrain and areas of population, it may be appropriate to undertake landscaping off-site, although if such landscaping was proposed to be consented by the Development Consent Order, it would have to be included in the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista.	The Order Limits do not include for off-site landscape mitigation as sufficient mitigation can be delivered within the Scheme boundary. Landscape and visual related design interventions and mitigation associated with the Scheme are described in ES Chapter 7 (Landscape and Visual Effects) Section 7.10 (**TR010066/APP/6.1**). Although acknowledging a small number of visual receptors in close proximity to the Scheme would experience a residual Moderate adverse (significant) visual effect (VP13), in the context and setting of the overall Scheme this would be relatively limited geographically. Having considered the residual (Year 15) landscape and visual assessments of effect, this assessment concludes that combining both landscape and visual effects, the Scheme would not result in a significant long term adverse residual effect on overall landscape and visual amenity but beneficial (Slight).

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		Landscape and visual mitigation measures embedded in the Scheme design are illustrated and detailed in the Environmental Masterplan - ES Figure 2.4 (**TR010066/APP/6.2**).
5.168	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality and can reinforce or enhance landscape features and character.	An Outline Landscape and Ecological Management Plan (OLEMP) is included in the First Iteration EMP (**TR010066/APP/6.5**). The OLEMP has been prepared to help ensure the protection and management of landscape and ecological features, such as vegetation and habitats, during construction of the Scheme and the successful establishment of landscape and ecological mitigation including planting and seeding associated with the Scheme. The OLEMP would be updated to a Landscape and Ecological Management Plan (LEMP) by the Principal Contractor and included within the Second Iteration EMP, as appropriate and necessary, prior to commencement of works in accordance with Requirement 4 of the draft DCO (**TR010066/APP/3.1**). Related design considerations are also presented in ES Chapter 2 (The Scheme) (**TR010066/APP/6.**1) and the Scheme Design Report (**TR010066/APP/7.4**). The landscape design has been developed to integrate the Scheme into the existing landscape setting including the use of hedgerows, woodland (roadside belts), individual trees and grassland areas. It also links in with existing landscape assets such as Coombe Abbey Park. The creation of drainage features that are permanently wet, would be planted with native aquatic vegetation would provide additional habitat for common amphibians, aquatic invertebrates and fish. The landscape design has been developed with the engineering and ecology design teams from the outset, to ensure its integration into the overall design. The landscape design has been developed to integrate the Scheme into the existing landscape setting and minimise visual intrusion. The environmental mitigation strategy also reinstates landscape features lost due to the Scheme such as replanting of hedgerows within the Scheme, new plantation woodland, as well as general enhancement of the landscape context wherever possible. It also links in with existing landscape and heritage assets, for example by providing isolated trees or small groups, along the road verge

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		to tie into the wider former parkland estate character near to Coombe Abbey Park. The Scheme planting design uses native planting species which are potentially suited to our changing climate (wetter winters and dry summers) i.e. more wet and dry tolerant species for long term climate change resistance. It has been determined that the study area consists of four distinct local landscape character areas. For the purposes of this assessment these areas are defined as Project Landscape Character Areas (paragraphs 7.8.6 to 7.8.16 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). The LVIA considers likely significant landscape and visual effects within Section 7.11 of this Chapter. Viewpoints have been agreed in discussion with Coventry City Council and Rugby Borough Council. Related design considerations are also presented in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**) and the Scheme Design Report (**TR010066/APP/7.4**). The Environmental Masterplan (ES Figure 2.4 (**TR010066/APP/6.2**)) has been in conjunction with ecologists to enhance and improve local habitats. Refer to ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) for further details of habitat improvements.
Decision-making		
Landscape impact		
5.169	Landscape effects of the project depend on the existing character of the local landscape, its capacity to accommodate change and nature of effect likely to occur. All of these factors need to be considered in judging the impact of a project on landscape. Projects need to have regard to siting, orientation, height operational and other relevant constraints. The aim should be to avoid or minimise harm to the landscape, where adverse impacts are unavoidable, providing reasonable mitigation and deliver landscape enhancement measures where possible and appropriate.	See response to NPS NN paragraph 5.164, 5.166 and 6.158. Embedded mitigation and essential mitigation measures for this aspect have been developed as presented within Section 7.10 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) has been informed by the Environment Act, and in collaboration with project ecologists and Scheme specific landscape and visual mitigation measures and are shown on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**). In the specific baseline context of the existing Walsgrave Junction, the principal potentially adverse impacts of the Scheme on landscape and visual

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		receptors, which have been the focus of this assessment and have influenced key mitigation strategies during the design development of ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) are: • Loss of tree cover (including woodland belts) and hedgerows along the A46 verges. • Potential effect on landscape character in the vicinity of the Scheme along the eastern edge of Coventry and Walsgrave Hill and Valley including the grade separated junction and associated infrastructure and potential changes in the landscape surrounding buildings at Hungerley Hall Farm in close proximity to the B4082 link road. • Potential effect on residential receptors along the edge of Coventry, Walsgrave near Farber Road/ Barrow Close and Dorchester Way and recreational receptors along the PRoW R75x at Walsgrave Hill (a section of Centenary Way close to Coombe Abbey), Sowe Valley, and Dorchester Way Open Space. Section 7.10 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) outlines the design, mitigation and enhancement measures for the Scheme. Environmental mitigation design measures integrated into the Scheme would mitigate or reduce landscape and visual effects identified within the LVIA. 7.10.4. Mitigation is included in the REAC contained within the First Iteration EMP (**TR010066/APP/6.5**). The First Iteration EMP will be developed into the Second Iteration EMP for implementation during construction and is secured by Requirement 4 of the draft DCO (**TR010066/APP/3.**1) (Commitment G1 of the REAC, Appendix A of the First Iteration EMP (**TR010066/APP/6.5**)). Generally, the landscape within the Scheme would be enhanced by: • increased areas of species rich grassland. • variety of planting types (woodland and scrub) creating different habitats. • increased hedgerows. • sense of arrival and destination thorough landscape design at the grade separated junction roundabouts with trees and ground cover.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Development proposed within nationally designated landscapes		
5.170	England's National Parks, the Broads and National Landscapes have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. The conservation and enhancement of the natural beauty of the landscape of the natural beauty of the landscape and countryside should be given great weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State should be satisfied that the scheme's design and delivery complies with the duty as revised by section 245 of the Levelling Up and Regeneration Act 2023 and any regulations making provision about how this duty is to be complied with. Regard should also be had to any relevant Defra guidance.	See the response to NPS paragraph 5.163.
5.171	The Secretary of State should refuse development consent in England's National Parks, the Broads and National Landscapes unless there are exceptional circumstances, where the benefits outweigh the harm and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment of: • the need for the development, including any national considerations and the impact of consenting, or not consenting it, upon the local economy • the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it, some other way, taking account of policy on alternatives set out in paragraphs 4.20 to 4.22 • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that would be moderated	See response to paragraph 5.170 above.
5.172	There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and National Landscapes, unless it can be shown there are exceptional circumstances for the new or enhanced capacity and with any benefits very significantly outweighing the harm.	See response to NPS NN paragraph 5.170.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	Planning of the Strategic Road Network should encourage routes that avoid impacts to National Parks, the Broads and National Landscapes.	
5.173	Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the project will be carried out to high environmental and design standards and includes measures to enhance the landscape and other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered.	See response to NPS NN paragraph 5.170.
Developments outside nationally designated landscapes which might affect them		
5.174	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas (in their "setting") which may have impacts within them. The aim should be to avoid harming the purposes of the designation and such projects should be located and designed sensitively, to avoid or minimise impacts. This should include projects in England, which may have impacts on designated areas in Wales or on National Scenic Areas in Scotland. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.	The Scheme is not within, within the setting of, nor affects land in England's National Parks, the Broads, or National Landscapes
Developments in locally important landscape areas		
5.175	Outside nationally designated landscapes, there are landscapes that may be valued locally and protected by local policy. Where a local development plan in England has policies based on landscape character assessment, these should be given particular consideration. However, such areas should not be used in and of themselves as reasons to refuse consent, as this may unduly restrict acceptable development.	Local landscapes have been considered within the LVIA and reported in Section 7.7 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). The study area consists of four distinctive local landscape character areas. For the purposes of this assessment these four areas have been defined as Project Landscape Character Areas (PLCA) (refer to ES Figure 7.2 Landscape Character Context, (**TR010066/APP/6.2**)). The landscape assessment contained in this ES Chapter identifies these PLCAs as the landscape receptors and assesses the landscape effect of the Scheme on each. The effects on these are described in the response to NPS paragraph 5.164.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.176	Within areas defined as Heritage Coast that are not already within one of the nationally designated landscape areas, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate unless it is compatible with its special character.	The Scheme is not within an area defined as Heritage Coast.
5.177	In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including any appropriate mitigation.	See responses to paragraphs 5.164 and 5.168. The First Iteration EMP (**TR010066/APP/6.5**) includes the REAC which identifies the mitigation identified within the ES to address the potential significant environmental effects of the Scheme. During construction, measures within the REAC include keeping a tidy site, avoiding stockpiling, protecting retained vegetation, minimising routes of construction vehicles, reducing light disturbance for sensitive receptors and constraining working hours, will reduce effects on landscape and visual receptors. See also Section 7.9 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**)) and the Environmental Masterplan (ES Figure 2.4) (**TR010066/APP/6.2**)).
Visual Impacts		
5.178	The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast. Within areas defined as Heritage Coast, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation.	See response to NPS NN paragraph 5.177. A detailed assessment of construction stage effects on representative viewpoints is set out in ES Appendix 7.3 Representative Viewpoints (**TR010066/APP/6.3**). Table 0 9 of ES Chapter 7 (Landscape and Visual Effects)) (**TR010066/APP/6.1**) summarises the conclusions of the representative viewpoint assessment and is further explained in paragraphs 7.11.12 and 7.11.13 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). Refer to ES Figure 7.4.1 to 7.4.13 (Representative Viewpoint Photography & Photomontages/ Visualisations) (**TR010066/APP/6.2**) for baseline photographs of representative viewpoints.

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		The majority of the representative viewpoints would experience either a Slight adverse (not significant) or Neutral (not significant) level of visual effect; despite small or no alternations to the baseline view, owing to the temporary presence of construction activities causing an adverse visual effect. The most significant construction phase visual effects on representative viewpoints would be associated with locations in closest proximity to the Scheme and construction works, particularly residential receptors and users of local footpaths. A detailed assessment of operational stage effects on representative viewpoints is set out in ES Appendix 7.3 (Representative Viewpoints) (**TR010066/APP/6.3**). Table 0 11 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) summarises the conclusions of the representative viewpoint assessment and is explained further in paragraphs 7.11.30 to 7.11.36. Refer to ES Figure 7.4.1 to 7.4.13 (Representative Viewpoint Photography & Photomontages/ Visualisations) (**TR010066/APP/6.2**) for baseline photographs of representative viewpoints. The Scheme is not in a coastal area.
Land use, including Open Space, Green Infrastructure and Green Belt		
Applicant's assessment		
5.181	Green Belts, defined in a development plan, are situated around certain cities and large built-up areas. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.	The A46 is within the Rugby Green Belt. The Rugby Green Belt boundary follows the western highway verge of the A46. Therefore, all of the existing A46 is in the Green Belt. Most of the proposed Scheme is in the Green Belt, except for the western dumbbell and the western B4082 slip road. The only significant development outside the existing footprint of the A46 is the small eastern dumbbell roundabout. Please refer to ES Figure 7.1 (Landscape Policy Context) (**TR010066/APP/6.2**).

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		As stated in the Case for the Scheme (**TR010066/APP/7.1**) Section 6, it is considered that the Scheme does not conflict with the five purposes of the Green Belt: *a) "to check the unrestricted sprawl of large built-up areas;* - the Scheme does not lead to sprawl of a large built-up area, the A46 effectively follows the Green Belt boundary, and therefore acts as a barrier to further development. *b) to prevent neighbouring towns merging into one another;* - the Scheme does not lead to neighbouring towns merging. *c) to assist in safeguarding the countryside from encroachment;* - the A46 is already within the Green Belt, therefore the Scheme does not encroach into the countryside in a significant way, over and above the existing A46. d) *to preserve the setting and special character of historic towns; and* - the Scheme does not impact the special character of historic towns. *e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."* - the Scheme is an alteration of the existing A46, it utilises existing A46 land as much as possible. ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) includes consideration of effects on visual amenity and openness within the Green Belt. With regards to the Scheme's impact on openness, it is considered that openness would be preserved, as the Scheme has been carefully designed and includes extensive mitigation to minimise visual impact on surrounding receptors – including landscaping around the new dumbbell roundabouts and landscaping along the B4082 slip road. Openness is not limited to a narrow volumetric approach and visual impacts may be relevant to openness as a matter of planning judgment. Although there will be change in the form of landscape caused by the Scheme, the rural landscape will remain open and would not be built up with urban development that would form urban sprawl. In addition, the development does not introduce uncharacteristic elements into the Green Belt, as A46 is already located within the Green Belt. There are a number of footpaths set within open agricultural land; offering long distance views with limited woodland cover except for Coombe Abbey Park

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		and the woodland belt along the edge of A46. Despite potential long-distance views from the wider landscape (Green Belt) localised topography limits the overall openness of the Green Belt. Green belt sensitivity is medium as there is limited or no direct visibility or interaction with the A46. ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) describes that construction effects upon the Green Belt within the study area are not considered likely to be significant due to their temporary nature and the footprint of the Scheme being located along the edge and the existing influence exerted upon its setting by the A46 highway corridor. During the operation of the Scheme, changes to the perceived visual and land use openness of the Green Belt would be most evident at Year 1 prior to the establishment of mitigation planting. As such, there would be a minor adverse magnitude of landscape character change and a slight adverse significance of effect on the openness of the Green Belt, however, in terms of openness, changes within the Green Belt would be limited due to the localised nature of the Scheme. By Year 15, effects on the openness of the Green Belt would have reduced to baseline condition as the mitigation planting would replicate the current tree and woodland characteristics of the area. As such, at Year 15 there would be a negligible magnitude of change and a slight adverse significance of effect as a result of the Scheme on the openness of the Green Belt which would continue to be perceived as being broadly rural and open consistent with the existing baseline. Overall, considering the Scheme's spatial and visual effects it would preserve the openness of the Green Belt.
5.182	Productive forests provide economic benefits to communities and ensure a supply of domestic timber resources. In addition, forests, trees and woodlands also provide wider ecosystem services. The Environmental Improvement Plan recognises the need to protect trees and woodland and increase tree canopy and woodland cover. Specific actions are set out in the England Trees Action Plan 2021 to 2024, including a commitment to ensure strong planning reforms will lead to more trees being planted and ensure strong protections for existing trees.	Ancient woodland and veteran trees scoped into the impact assessment are considered important at a national level. The Applicant has prepared an Arboricultural Impact Assessment ES Appendix 7.4 (**TR010066/APP/6.3**)) in support of the Scheme at A46 Coventry Junctions (Walsgrave). This arboricultural survey and report are produced in accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction: Recommendations. The survey recorded a total of 55 individual trees, 29 groups of trees, 18 hedgerows and one woodland. These comprise of 12 'A'

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		category, 38 ‘B’ category, 49 ‘C’ category and 4 ‘U’ category. One tree (T12 pedunculate oak) is categorised as veteran. Mitigation against impacts to retained trees and woodland, including within Coombe Pool SSSI and the veteran oak tree (T12), due to works within the RPZ is detailed within ES Appendix 7.4 (Arboricultural Impact Assessment) (**TR010066/APP/6.3**). The Scheme would require the removal of 15 individual trees, six groups of trees and one hedgerow. There would also be a part-removal of a further seven groups of trees and eight hedgerows. These comprise of 1 ‘A’ category, 12 ‘B’ category, 21 ‘C’ category and three ‘U’ category. None of the trees proposed for removal are afforded statutory protection by a TPO, conservation area, nor considered aged or veteran. The part-removals principally comprise early-mature highway embankment planting groups. The groups are of moderate or low arboricultural value and relatively easily replaced with new tree planting. Where part of a tree group is to be removed, the final extent of tree removal must be determined on-site in conjunction with the ACoW. Facilitation tree pruning would be required to enable construction of the Scheme. Canopy pruning would be necessary to retained trees including T1, T46-T55 and group G29. All arboricultural works shall be carried out by suitably qualified, insured and experienced professionals working to BS3998:2010 Tree Works Recommendations. New native hedgerow planting and timber fencing is proposed within the RPA of T12 pedunculate oak, a veteran tree. Native planting within the veteran tree buffer zone is in accordance with standing advice recommendations for buffer zones and will contribute to the wider ecological networks. Minor groundworks to facilitate the landscaping would not constitute loss or deterioration of this veteran tree.

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		Groundworks would be required to facilitate the new environmental bund and perimeter fencing adjacent to Coombe Pool SSSI woodland boundary. This will require working within the RPAs of retained trees subject to statutory protection. Sensitive working methodologies, temporary ground protection and on-site supervision will ensure that no foreseeable damage occurs to the retained trees. All trees to be retained on the site will be protected by barriers and/or ground protection to create a CEZ around their associated RPA. The protective barriers are to be installed prior to any development activity. The England Trees Action 2021 to 2024 has been reviewed as part of the assessment. This assessment includes protection measures for retained trees and hedgerows within the Order Limits. As set out ES Chapter 8 Biodiversity (**TR010066/APP/6.1**), the Scheme has been designed to maximise retention of existing trees where feasible. Retained trees within, or partially within, the Order Limits include 12 individual trees and one group of trees identified as having roosting potential for bats. Habitat creation will take place along the verges of the Scheme and within SuDS areas and would include species-rich grassland, amenity grassland, shrubs, ground cover, woodland, scrub, native hedgerows with trees, marsh and wet grassland and individual tree planting. An area within the Order Limits to the north-east of the existing junction will be used for mitigation woodland planting to mitigate for loss of woodland due to the Scheme. Habitat connectivity along the Scheme would be achieved through the creation of native hedgerows and tree lines along the verges created as a vegetative screen and to maintain the local landscape character of the area (ES Chapter 7 (Landscape and visual effects) (**TR010066/APP/6.1**)). Embedded mitigation and essential mitigation measures for this aspect have been developed and are shown on ES Figure 2.4 Environmental Masterplan (**TR010066/APP/6.2**). The Environmental Masterplan includes creation of habitat within Hungerley Hall Farm Ecosite including species-rich grassland,

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		woodland, scrub and hedgerows with trees. Hedgerow removal has been minimised as far as feasible. The Environmental Masterplan includes the creation of 0.29km of native species-rich hedgerow and 2.09km of native species-rich hedgerow with trees. ES Appendix 8.1 (Biodiversity Net Gain Report (**TR010066/APP/6.3**) details habitat creation and its strategic significance). The REAC, Appendix A in the First Iteration EMP (**TR010066/APP/6.5**) describes the ecological mitigation in detail. See response to NPS NN paragraph 5.168 for more detail on landscaping and planting.
5.183	Applicants should acknowledge the importance of considering and making the best use of land to deliver multiple different outcomes, both in terms of ensuring the land is suitable for the proposed infrastructure and in terms of exploring multifunctional outcomes from a particular action.	ES Chapter 12: Population and Human Health (**TR010066/APP/6.1**) identifies existing land uses and receptors in the vicinity of the Scheme and assesses their sensitivity, using the criteria in Table 3.11 of DMRB LA 112, to the potential effects of the Scheme and the potential magnitude of impact. Residential, businesses, agricultural holdings, recreational users, PRoW, new developments and uses proposed in the Development Plan are considered. Consultation has taken place with Coventry City Council, Rugby Borough Council, Warwickshire County Council and Natural England as detailed in the Consultation Report (**TR010066/APP/5.1**) Table 3-1.
5.184	The applicant should identify existing and proposed land uses near the project, any effects of replacing and existing development or use of the site with the proposed project, or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate.	See response to NPS NN paragraph 5.183. The Scheme has considered other existing and proposed development in the area and does not preclude and development. As set out in the Case for the Scheme (**TR010066/APP/7.1**), the A46 corridor provides opportunities for economic growth and improved accessibility within Coventry and Warwickshire enabling the unlocking of sites for residential development, such as the allocated land to the west of the A46 and improving access to existing commercial areas. The Scheme will enable future residential development opportunities by providing potential means of access to A46, such as those to the west of the

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		A46 allocated in the Coventry Local Plan. An example includes Walsgrave Hill Farm Allocation (H2:3) which provides a projected 900 homes. Coventry City Council are in discussions with a local developer who are progressing plans for a development on the adjacent housing allocation about a hospital link road to University Hospital Coventry. This would be delivered by the developer undertaking the residential development within the housing allocation to the west of the Scheme - Coventry Local Plan, 2017 – allocation H2:3 Walsgrave Hill Farm. Therefore, a potential hospital link road is a separate development to the A46 Coventry Junctions (Walsgrave) Scheme. However, the Scheme has been designed so it does not impede a potential hospital link road if it comes forward in the future: • For the western dumbbell roundabout, the Applicant has designed the geometry to accommodate a future hospital link road. • Planting including new woodland is proposed around the western side of the roundabout. For a future link road, a corridor would need to be created. The adjacent development is still not committed and potentially it may not come forward for years. If this area is not planted, there will be a large gap in the visual screening of the new junction, and a break in the woodland planting which would have adverse impacts on wildlife. With regards to WCH provision, the Scheme incorporates enabling works for future WCH provision to be provided by others. This includes additional earth works which provides verge widening along the new section of the B4082 link road to accommodate the future provision of a segregated walking and cycling route and a section of shared use path by others. The Applicant has also retained the Hungerley Hall Farm accommodation bridge and will continue to maintain the asset. These enabling works have the potential to facilitate a new route from Clifford Bridge Road and the Binley Cycleway (to be delivered by Coventry City Council) to Coombe Abbey Park in the future, at a substantially reduced cost and disruption. Such a route would connect with committed and proposed future active travel schemes within Coventry and Warwickshire local authority areas.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.185	Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity, quality and functionality in a suitable and accessible location. Applicants considering proposals which would involve developing such land should have regard to any local authority's assessment of need for such types of land and buildings.	The Scheme involves the temporary possession of a small area of open space. As shown in Part 5 of the Book of Reference (**TR010066/APP/4.3**) and the Special Category Land Plans (**TR010066/APP/2.8**), the draft DCO (**TR010066/APP/3.1**) makes provision for the temporary possession of Special Category Land, comprising open space which is part of Coombe Abbey Park, Registered Park and Garden. The open space land will be required temporarily during the construction of the Scheme for the reinstatement of existing timber fence where required and vegetation removal, as shown on sheet 2 of the Works Plans (Work No. 3B) (**TR010066/APP/2.3**). Full details are provided within Annex C of the Statement of Reasons (**TR010066/APP/4.1**) and the Special Category Land Plans (**TR010066/APP/2.8**).
5.186	The applicant should engage pre-application discussions with the local planning authority and other regulatory bodies at the earliest opportunity. It is essential that engagement is meaningful and supported where necessary by Statements of Common Ground. Discussions will cover a range of potential local impacts and issues, and the local planning authority should identify any concerns it has about the impacts of the application on land-use, having regard to the development plan and relevant applications. This includes, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which is submitted during examination and after an application for development consent has been accepted.	As part of the Scheme's development, the production of the ES (**TR010066/APP/6.1**) and Transport Assessment (**TR010066/APP/7.5**), discussions have been held with the local planning authorities (Coventry City Council and Rugby Borough Council) and the local highway authorities (Coventry City Council and Warwickshire County Council). A summary of consultation undertaken is outlined in the Consultation Report (**TR010066/APP/5.1**) Table 3-1. Statements of Common Ground are being developed to record the matters that have been agreed between the parties and to identify any matters where comments still need to be resolve. The Case for the Scheme (**TR010066/APP/7.1**) outlines where the local development plans and policy have been considered as part of the Scheme. As set out in ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**), the assessment of cumulative effects involves the identification of incremental changes likely to be caused by reasonably foreseeable existing and / or approved developments, hereafter referred to as 'other developments'; considered together with the Scheme.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		To identify relevant 'other developments' to be included in the long list for assessment of potential cumulative effects, a ZoI has been established which applies to each environmental aspect. Engagement with the local planning authorities has been carried out on the long and short lists. Warwickshire County Council, Rugby Borough Council and Coventry County Council were contacted on the 3 April 2024 and sent the cumulative effects assessment matrix from the Planning Inspectorate's Advice Note 17, which details the current long and short list of developments. This email asked for them to respond to confirm they are in agreement with our long list and short list of developments and if they were aware of any additional developments that should be incorporated to the matrix. Following the responses from Rugby Borough Council on 4 April 2024, Warwickshire County Council on April 17, 2024, and Coventry County Council on July 4 2024, an additional project was added to the long list, planning application R23/1027. Some of the suggestions made included developments that lie outside the Zone of Influence (ZoI) or referred specifically to traffic related impacts which are covered in the Transport Assessment for the Scheme (**TR010066/APP/7.3**), and therefore were not progressed further in this assessment. Two developments met the criteria for inclusion in the short list of developments in ES Appendix 15.1 (Cumulative Effects Long and Short List) (**TR010066/APP/6.3**). It is not anticipated that the Scheme would result in any significant cumulative effects with these Schemes. The Coventry Infrastructure Delivery Plan (IDP) specifically mentions the significant A46 upgrades to the A46 corridor, particularly focusing on improving junctions at Binley and Walsgrave. The design of the Scheme will not only increase road capacity and deliver reduced congestion and improve journey times, but it will also provide the environment enhancements to the land

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		adjoining Coombe Pool SSSI; and enable transport infrastructure to enable the delivery of Walsgrave Hill Housing Allocation of up to 900 homes. The IDP states that the new grade separated junction will be created on the A46 near Walsgrave Hill Farm to support new development access. The IDP says that the Scheme (and others) "in particular represent clear commitments to using infrastructure to unlock growth not just for Coventry but jointly with Nuneaton and Bedworth and Rugby Borough Councils respectively.
5.187	The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if so, whether their proposal may be considered inappropriate development within the meaning of Green Belt planning policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances.	See the response to NPS NN paragraph 5.181. It is considered that even if the project was considered to be inappropriate development in the Green Belt by the Secretary of State, which is not the Applicant's case, any actual or perceived harm to the openness of the Green Belt is clearly outweighed by other material considerations, which justify the application of 'very special circumstances' in support of the Scheme. These very special circumstances include the benefits of the Scheme: • Reduced congestion - The Scheme will improve the operation and efficiency of the existing transport network associated with Walsgrave Junction to increase capacity. • Safety and maintenance – The Scheme will enable the A46 to be maintained to a safe and serviceable condition, with maintenance being considered during design. The introduction of the Scheme leads to a decrease in overall accidents, although a small shift towards a higher severity is seen. • Growth – The Scheme will support and facilitate economic growth, generating employment and residential development opportunities. • Environment – The Scheme will reduce negative impacts on the wider environment whilst seeking environmental enhancement and providing biodiversity net gain. • Customer – The Scheme will reduce negative impacts on users, local communities and the environment whilst balancing the needs of individuals and businesses that use and rely upon the A46. Paragraph 155 of the NPPF states *that "Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it."* The

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		list of these developments include: *(c) "local transport infrastructure which can demonstrate a requirement for Green Belt location".* As explained in the Case for the Scheme (**TR010066/APP/7.1**) Section 6, the location of the Scheme is unavoidable due to the need to mitigate severe congestion on the existing route within the Green Belt. It is considered that the Scheme is not inappropriate development within the Green Belt, as, due to the existing Green Belt location of the A46: • the Scheme preserves openness: openness is not reduced by the Scheme as is demonstrated in the following paragraphs: 6.3.320 – 6.3.324. Due to the presence of the existing junction and the scale, form, and the extent of the proposed junction, the spatial and visual effects would preserve the openness of the Green Belt; • the Scheme and does not conflict with the purposes of the Green Belt as demonstrated in paragraph 6.3.315 of this Section above; • the Scheme provides local (and national) transport infrastructure, particularly the local access from the eastern dumbbell roundabout, which requires a Green Belt location due to the existing Green Belt location of the A46 Walgrave Junction. The Scheme provides local transport infrastructure in the form of a new Walsgrave junction, that benefits the local area by reducing congestion and reducing accidents on the local network (although a small shift towards a higher severity is seen). Due to the presence of the existing junction and the scale, form, and extent of the proposed junction, the spatial and visual effects would preserve the openness of the Green Belt. The Scheme therefore falls under the exceptions within Paragraph 155 of the NPPF and therefore does not constitute inappropriate development in the Green Belt. This aligns with the decision on the A38 Derby Junctions Scheme, where the Secretary of State agreed with the Examining Authority that the proposed development would fall within the exception set out in paragraph 150 of the NPPF 2021 (now paragraph 155 of the NPPF 2023) and would not be considered as inappropriate development in the Green Belt.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Overall, although the Scheme is within the Green Belt, it is considered that it is not inappropriate development, and falls under exception (c) of NPPF paragraph 155. The existing A46 and Walsgrave Junction infrastructure is already located within the Green Belt, the Scheme preserves openness, it does not conflict with the purposes of the Green Belt, and it provides local transport infrastructure. In addition, it also provides very special circumstances as there is critical need for the Scheme.
5.188	Linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land. The identification of a policy need for linear infrastructure will take account of the fact that there will be an impact on the Green Belt and, as far as possible, of the need to contribute to the achievements of objectives for the use of the land in Green Belts.	See the response to NPS NN paragraph 5.181 and 5.187. The Coventry Infrastructure Delivery Plan (IDP) specifically mentions the significant A46 upgrades to the A46 corridor, particularly focusing on improving junctions at Binley and Walsgrave. The design of the Scheme will not only increase road capacity and deliver reduced congestion and improve journey times, but it will also provide the environment enhancements to the land adjoining Coombe Pool SSSI; and enable transport infrastructure to enable the delivery of Walsgrave Hill Housing Allocation of up to 900 homes. The IDP states that the new grade separated junction will be created on the A46 near Walsgrave Hill Farm to support new development access. The IDP says that the Scheme (and others) “in particular represent clear commitments to using infrastructure to unlock growth not just for Coventry but jointly with Nuneaton and Bedworth and Rugby Borough Councils respectively. Rugby Local Plan recognises the economic and population growth in the area and need to proactively plan for this, recognising the need for improved infrastructure and transport network. Improvements to the A46 are not specifically mentioned within the Rugby Infrastructure Delivery Plan (2016). However, the Infrastructure Delivery Plan mentions Highways England (now National Highways) is responsible for operating, maintaining and improving the strategic road network in England on behalf of the Secretary of State for Transport and “The council needs to demonstrate that the proposals in the Local Plan will not have a significant impact on the strategic road network.”
5.189	Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1,	The effects of the Scheme on agricultural land and best and most versatile (BMV) (agricultural land) are reported in ES Chapter 9 (Geology and Soils)

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil health and protect and improve soils, taking into account any mitigation measures proposed. Soil is an important natural capital resource, providing many essential services such as storing carbon (also known as a carbon sink), reducing the risk of flooding, providing wildlife habitats and delivering global food supplies. Guidance on sustainable soil management can be found in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. As a first principle, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value (see paragraphs 5.152 to 5.159).	(**TR010066/APP/6.1**) and are informed by ES Appendix 9.2 (Soil Resource Plan and Agricultural Land Classification) (**TR010066/APP/6.3**). This assessment uses Environment Agency (2023) Land Contamination Risk Management (LCRM) guidance to assess risks posed to human health and the environment. The detailed field work carried out for the assessment indicated that the agricultural land quality within the Scheme footprint is a mixture of Grade 1, Subgrade 3a and Subgrade 3b as shown below in Table 9-9. The areas of Grade 1 and Subgrade 3a agricultural land are considered to be BMV agricultural land and make up 65% of the Order Limits. The detailed field work carried out for the assessment indicated that the agricultural land quality within the Scheme footprint is a mixture of Grade 1, Subgrade 3a and Subgrade 3b as shown below in Table 9-9. The areas of Grade 1 and Subgrade 3a agricultural land are considered to be BMV agricultural land and make up 65% of the Order Limits. The most applicable mitigation for reducing impacts on agricultural soils on this Scheme is following methodologies set for soil handling in the Soil Handling Management Plan (SHMP) (to be produced during the detailed design stage and to form part of the Second Iteration EMP) and Secure though Requirement 4 of the draft DCO (**TR010066/APP/3.1**). A SHMP will be developed to help preserve land quality on the temporary land take areas and to make effective reuse of the soils taken from the areas of permanent land take. Provided that the mitigation and monitoring measures are effective, and areas of temporary land take are restored back to their former condition, the long-term residual effects on agricultural soils would be limited to the permanent loss of agricultural land. The permanent loss of Grade 1 land is considered to be of large adverse significance, the permanent loss of Subgrade 3a and Subgrade 3b agricultural land is considered to be of moderate adverse significance of effect.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The operational phase of the Scheme results in a reduced potential for harm as the underlying soils are no longer exposed or disturbed effectively breaking potential pathways to receptors and presents no further impacts to agricultural soils. Provided that the mitigation measures are effective and areas of temporary land take are restored back to their former condition, the long-term residual effects on agricultural soils would be limited to the permanent loss of agricultural land: • The permanent loss of 7.8 hectares of Grade 1 agricultural land is considered to be of moderate magnitude and large adverse significance. • The permanent loss of 3.3 hectares of Subgrade 3a agricultural land is considered to be of moderate magnitude and moderate adverse significance. • The permanent loss of 4.5 hectares of Subgrade 3b agricultural land is considered to be of moderate magnitude and moderate adverse significance. It is predicted that the Scheme is unlikely to give rise to any significant effects upon geology or soils during the operational phase.
5.190	The Agricultural Land Classification is the only approved system for grading agricultural quality in England and Wales. If necessary, field surveys should be used to establish the Agricultural Land Classification grades in accordance with the current grading criteria, or any successor to it and identify the soil types to inform soil management at the construction, operation and decommissioning phases in line with the Defra Construction Code. Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This is to be in line with the ambition set out in the Environmental Improvement Plan for sustainable management of agricultural soils.	See response to NPS NN paragraph 5.189

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.191	Applicants should safeguard any mineral resources on the proposed site as far as possible. Taking into account the policies of the Minerals Planning Authority, applicants should consider whether prior extraction of the minerals would be appropriate.	MSA have been scoped out of further assessment in agreement with the Planning Inspectorates Scoping Opinion (**TR010066/APP/6.9**). A review of the existing geology and soil baseline conditions, consideration of the potential impacts, identification of proportionate mitigation and identification of residual effects caused by the Scheme is set out ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**). See response to NPS NN paragraph 5.186.
Mitigation		
5.192	Applicants can avoid, or minimise, the direct effects of a project on the existing use of the proposed site or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction.	See response to NPS NN paragraph 5.184 and 5.187. The Scheme Design Report (**TR010066/APP/7.4**)) explains the evolution of the design and the measures incorporated into the Scheme and provides details of land use. A review of the existing geology and soil baseline conditions, consideration of the potential impacts, identification of proportionate mitigation and identification of residual effects caused by the Scheme is set out ES Chapter 9 (Geology and Soils) (**TR010066/APP/6.1**). Mitigation measures are also set out in the First Iteration EMP – Appendix A - REAC (**TR010066/APP/6.5**) and are secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). A Second Iteration EMP will be produced which reflect the mitigation measures required by the REAC (Appendix A of First Iteration EMP (**TR010066/APP/6.5**)) and set out in the ES and includes various management plans and method statements. This is secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**). This includes the production of a Soil Handling Management Plan.
5.193	Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to	ES Chapter 12 Population and Human Health (**TR010066/APP/6.1**) identifies the WCH routes within the study area.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	avoid or mitigate any adverse impacts. Applicants should endeavour to improve networks green infrastructure and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of ways.	The Scheme has been designed to reduce the need to close and divert footways, PRoW or cycle facilities. Potential impacts of the Scheme during construction include disruption to accessing private property and housing, community land and assets and development land and businesses due to road closures and construction traffic, and disruption to WCH route use. A Construction Traffic Management Plan (CTMP) will be in place to mitigate construction traffic and road closure related impacts. An OTMP is submitted as part of the application (**TR010066/APP/7.5**). ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1)** details the WCH facilities that will be provided to provide improved connectivity. The Scheme would improve strategic and local connectivity in Coventry and the wider area provides opportunities for future WCH routes to come forward. Improvements to facilities for walkers, cyclists and horse-riders are provided through provision of a signalised pedestrian crossing on the B4082 and enabling infrastructure within the Scheme to allow a potential future route for WCH along the B4082 link road to the Hungerley Hall Farm accommodation bridge to be brought forward by others. No green infrastructure will be affected by the Scheme.
5.194	The Secretary of State should also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of planning obligations, for example, to provide and exchange of land between two owners and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided under those sections will need to conform to the requirements of those sections.	See response to NPS NN paragraph 5.193. No additional or exchange land is required.
5.195	Existing trees and woodlands should be retained where possible. The applicant should assess the impacts on, and the loss of, all trees and woodlands within the project boundary and avoid and mitigate for any	See response to NPS NN paragraph 5.182.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	direct and indirect effects and any risk of net deforestation as a result of the scheme (Irreplaceable Habitats require separate consideration 5.57-5.58). Mitigation may include the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured. Opportunities for tree planting and woodland creation should be maximised.	
5.196	Where the proposed development has an impact on a Mineral Safeguarding Area, the Secretary of State should ensure the applicant has put forward appropriate mitigation measures to safeguard mineral resources.	MSA have been scoped out of further assessment in agreement with the Planning Inspectorate's Scoping Opinion (**TR010066/APP/6.9**).
5.197	Where a project has a sterilising effect on land use there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors, or improving access and connectivity. Other examples include, prioritising active travel or well-designed optimised parking and storage in employment areas with appropriate landscaping.	The benefits of the Scheme detailed in the Case for the Scheme (**TR010066/APP/7.1**) and planning balance detailed in section 6.6 show that the Scheme outweighs any sterilising effects on the agricultural land lost by the Scheme. See response to NPS NN paragraph 5.168 for more detail on landscaping and planting. The design of the Scheme design has progressed, and design enhancements have tried to minimise land take. This has included the removal of the haul road on the western side of the Scheme and removal of a drainage basin to the north of Scheme. More details about how the Scheme has progressed through the design stages are provided in the Scheme Design Report (**TR010066/APP/7.4**). The Applicant considers that the land included in the draft DCO (**TR010066/APP/3.1**) is the minimum land-take required to construct, operate, maintain and mitigate the Scheme and is necessary to achieve the objectives of the Scheme. The Applicant has sought to achieve a balance between minimising land-take and securing sufficient land to deliver the Scheme, noting that the detailed design of the Scheme has yet to be developed. In that

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		context, the limits of deviation have been drawn as tightly as possible so as to avoid unnecessary land-take. In the event that less land proves to be required in a particular area following the detailed design stage, the Applicant would only seek to acquire that part of the land that is required and, in all events, will seek to minimise effects on land interests. In designing the Scheme and determining the Land subject to compulsory acquisition and temporary possession powers, the Applicant has considered alternatives and modifications to the Scheme to minimise the potential land-take. These alternatives and modifications were consulted on and the preferred route has been chosen based on a thorough consideration of relevant issues. This process is described in detail in ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**) and Section 2 of the Case for the Scheme (**TR010066/APP/7.1**).
5.198	Public rights of way, National Trails, and other rights of access to land (for example, open access land) are important recreational facilities for pedestrians, wheelers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, public rights of way and open access to land, and to consider what opportunities there may be to improve access and connectivity. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.	See response to NPS NN paragraph 5.193.
5.199	Public rights of way can be extinguished under section 136 of the Planning Act if the Secretary of State is satisfied that an alternative has been or will be provided or it is not required.	The Scheme will not extinguish any public rights of way.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
NPS NN Paragraph Number	**Requirement of the NPS NN**	**Compliance with the NPS NN**
Decision-making		
5.200	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or if the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account the positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	See response to NPS NN paragraph 5.185.
5.201	Where networks of green infrastructure have been identified in development plans, they should be protected from development, and, where possible, strengthened. The environmental and visual value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account, including the creation of new green infrastructure, when assessing the impact on green infrastructure. The value of the development in improving connectivity, particularly through active travel links and recreation should also be taken into account when assessing the impact on green infrastructure.	See response to NPS NN paragraph 5.193. Habitat connectivity along the Scheme would be achieved through the creation of native hedgerows and tree lines along the verges created as a vegetative screen and to maintain the local landscape character of the area as detailed in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**)). To mitigate for approximately 0.19ha of SSSI woodland loss planting of 0.34ha of woodland will be undertaken, which is a 1.73 replacement ratio. Whilst the planted woodland would be outside of the SSSI it would have direct connectivity with the impacted area of woodland. As set out in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**), Section 8.10, retention of the Hungerley Hall Farm accommodation overbridge would maintain this as a commuting route and crossing point over the A46

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		carriageway for bats. The Farber Road overbridge would not be impacted and as such is retained as a potential commuting route. The Scheme design includes the retention of the Hungerley Hall Farm accommodation overbridge which badgers currently use to cross the A46. Maintaining the bridge as a commuting route for badger (i.e. keeping the bridge open and unobstructed for badger) during construction would reduce severance of habitat, however some temporary severance during the construction phase is likely due to the construction of the B4082. The Scheme includes the creation of a badger crossing beneath the B4082 to mitigate against badger mortality on the realigned B4082 as badgers cross the retained Hungerley Hall Farm accommodation overbridge. The crossing would also mitigate against habitat fragmentation, allowing badgers to safely continue to access previously accessible habitat to the west of the A46. The location of the crossing (approximately 120m north of the Hungerley Hall Farm accommodation overbridge as shown on Sheet 4 of the Works Plans (**TR010066/APP/2.3**)) has been situated as close to the existing commuting route as feasible considering the topography of the Scheme and B4082. Badger-proof fencing and gateways (gate-sized holes in the fencing with no swinging gate attached) would be used alongside the crossing to reduce badger mortality and increase the likelihood of badgers locating the crossing. The badger crossing and fencing has been designed in accordance with the Manual of Contract Documents for Highway Works (MCHW) and through liaison with Natural England. Details of the fencing and crossing are included within ES Appendix 8.13 (Draft Badger Mitigation Licence) (**TR010066/APP/6.1**). The creation of this crossing would also provide a potential crossing for other species. The detailed design of the crossing and fencing will be finalised during the detailed design stage in consultation with Natural England. The Hungerley Hall Farm accommodation overbridge would remain unobstructed during operation to maintain this commuting route for badger and avoid habitat fragmentation. This is considered to be essential mitigation.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.202	The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise the impact on soil or soil resources.	See the response to NPS NN paragraph 5.189. Whilst it is acknowledged that the Scheme will unavoidably result in limited adverse impacts this does not outweigh the positive benefits of the Scheme. The residual impacts of this Scheme, following mitigation, do not outweigh its positive overall benefits.
5.203	Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any Development Consent Order, the Examining Authority and the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. When located in the Green Belt, elements of many national networks infrastructure projects may comprise inappropriate development. In such cases, scheme promotors will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the safety benefits associated with improvements to the relevant section of the national network.	See the response to NPS NN paragraphs 5.181 and 5.187. Please refer to Section 6 of the Case for the Scheme (**TR010066/APP/7.1**) that details the very special circumstances of the Scheme's location within the Green Belt. It is considered that any actual or perceived harm to the openness of the Green Belt is clearly outweighed by other material considerations, which justify the application of 'very special circumstances' in support of the Scheme. These very special circumstances include the benefits of the Scheme: • Reduced congestion - the Scheme will improve the operation and efficiency of the existing transport network associated with Walsgrave Junction to increase capacity. • Safety and maintenance – The Scheme will enable the A46 to be maintained to a safe and serviceable condition, with maintenance being considered during design. The introduction of the Scheme leads to a decrease in overall accidents, although a small shift towards a higher severity is seen. • Growth – the Scheme will support and facilitate economic growth, generating employment and residential development opportunities. • Environment – The Scheme will reduce negative impacts on the wider environment whilst seeking environmental enhancement and providing biodiversity net gain. • Customer – The Scheme will reduce negative impacts on users, local communities and the environment whilst balancing the needs of individuals and businesses that use and rely upon the A46.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Addressing the planning balance, the 'critical need' to improve the SRN to deliver a national network that meets the country's long-term needs and supports a prosperous and competitive economy, reduced congestion and improvements to journey time reliability, and benefits to businesses during the operational phase bring substantial weight in favour of the DCO being made. The Scheme therefore is in accordance with paragraphs 5.187, 5.188 and 5.203 of the NPS NN, and 154 of the NPPF. To avoid, reduce or remediate (offset) potential effects on the landscape, embedded mitigation measures and essential mitigation measures for this aspect have been developed as presented within Section 7.10 of ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**). These are shown on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**) this includes screening of the eastern dumbbell with planting.
Historic Environment		
Applicant's assessment		
5.210	The applicant should undertake an assessment of any significant heritage impacts of the proposed project and should describe the significance of any heritage assets affected, including any contribution made to their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes, heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.	ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) and Appendices 6.1 – 6.4 (**TR010066/APP/6.3**) provide the assessment of cultural heritage. All heritage assets relevant to the Scheme have been identified from utilisation of documentary sources, a site walkover survey and archaeological field survey. The results of desk-based work and site visits (ES Appendix 6.1 (Cultural heritage information)) (**TR010066/APP/6.3**) have been used to inform the assessment of archaeological potential. ES Appendix 6.1 ((Cultural heritage information)) (**TR010066/APP/6.3**) goes into detail about the heritage assets affected and has determined their value through a series of processes including the extent to which setting contributes to the assets in question. The potential significant heritage impacts have been assessed in ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) and in ES Appendix 6.1 ((Cultural Heritage Information)) (**TR010066/APP/6.3**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The assessment has been undertaken in accordance with DMRB LA 106 (Cultural Heritage Assessment) and has considered designated and non-designated heritage assets including: • two Scheduled Monuments; • one Grade II* Registered Park and Garden, also designated as a Conservation Area; • 25 Listed Buildings (two grade I, three grade II*, and 17 grade II); • 144 non-designated heritage assets, including findspots; and • 11 newly identified non-designated heritage assets. The level of assessment is proportionate to the importance of each asset and the likely impact of the Scheme, including an assessment of the magnitude of the impacts on below ground remains, built heritage assets and historic landscapes during the construction and operational phases of the scheme. In addition to the Historic Environment Record, a variety of other sources were consulted to establish the baseline for cultural heritage assessments. These include archival materials, historic mapping, reports of previous investigations within the study area, and site visits, including a geophysical survey and trial trenching to assess the conditions and settings of heritage assets. The assessment has been carried out in line with relevant legislation, policy, guidance and best practice. The assessment has identified no significant adverse effects following mitigation. There are two (not significant), slight adverse effects: • An effect as a result of a physical impact was identified at the listed Hungerley Hall Farm. A programme of Historic Building Recording is proposed to mitigate this effect. • An effect as a result of changes to setting was identified at the listed Hungerley Hall Farm. Landscape planting is proposed to soften this impact.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The Scheme area has a very low archaeological potential. Any potential effects on further unexpected archaeological remains will be mitigated through the unexpected archaeological finds protocol (UAFP).
5.211	The discovery of heritage assets has potential to have a significant delay on scheme development, and applicants should ensure that protection of the historic environment is considered early in the development process.	The consideration of heritage assets has informed the development of the Scheme from the early stages (including consideration of alternatives) as set out in the Scheme Design Report (**TR010066/APP/7.4**). As described in ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**), it is considered that the Scheme area has a very low potential for further unknown archaeological remains. Almost all non-designated archaeological heritage assets identified within the Scheme have been shown to no longer survive as physical remains. The single identifiable archaeological feature (HA006) has been investigated as far as is useful to the archaeological record to do so. Therefore, no targeted advanced or construction-integrated archaeological recording is proposed. The Order Limits contain land that has not been developed or quarried and therefore, while the probability of further finds is very low, the area is not archaeologically sterile. During construction, a protocol for unexpected archaeological discoveries will be developed. This unexpected archaeological finds protocol (UAFP) will set out in the outline heritage mitigation strategy, as part of the First Iteration EMP (**TR010066/APP/6.5**). It is expected to include, as a minimum: • Provision for the Principal Contractor to engage appropriate archaeological expertise to call on in the event of an unexpected find. • Protocols for initial responses to potential discoveries and clear lines of communication and responsibility. • Toolbox talks or other instruction methods, delivered by an appropriately qualified archaeologist, to ensure site staff understand the reasons for the UAFP as well as the scope and procedures. • Outline standards and methods for protection, recording, and archiving of relevant finds, or for preservation in situ if necessary and feasible.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• Communications plans for consulting with the relevant stakeholders and monitoring authorities. • Provision of copies of the archaeological baseline, geophysical survey and trial trenching reports for quick reference (Appendix 6.1, 6.2, and 6.4 **TR010066/APP/6.2**). The cultural heritage assessment (ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**)) has been undertaken by a Principal Heritage Consultant who holds full corporate membership with the Chartered Institute for Archaeologists (MCIfA). The Principal Consultant has over 18 years of experience undertaking heritage assessments for highways schemes throughout the UK. A technical review of this assessment was undertaken by an Associate Director with 30 years of professional heritage experience. They have used their EIA knowledge, experience with DMRB and road schemes and professional judgement in identifying the likely significant effects associated with the Scheme.
Mitigation		
5.212	A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.	The First Iteration EMP (**TR010066/APP/6.5**) and Section **6.10** of ES Chapter 6 Cultural Heritage (**TR010066/APP/6.1**) detail the design of mitigation proposed in relation to the Scheme. Design intervention is mitigation embedded into the design of the proposed scheme and is achieved through an iterative process and enforced through consent commitments. Specific design considerations have been taken to avoid impacts on Coombe Abbey Park. These include carriageway alignment and earthworks design, carried through from selection of the preferred design option as discussed in ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**). An exhaustive design assessment exercise was undertaken regarding the design elements in the vicinity to Hungerley Hall Farm. The desirability of avoiding physical impacts on the listed building was a key consideration and was weighed against the physical and regulatory design constraints, as well as the cost of the various approaches considered. The permanent and temporary

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Scheme design is informed by that process and avoids Hungerley Hall Farm to the greatest degree that is reasonably practicable. Further details are available in ES Chapter 3 (Assessment of Alternatives) (**TR010066/APP/6.1**). Mitigation measures of relevance during construction are included within the First Iteration EMP (**TR010066/APP/6.4**). The First Iteration EMP will be developed into a Second Iteration EMP for implementation during construction of the Scheme. Details on the First and Second Iteration EMPs, including how mitigation is secured within the draft DCO (**TR010066/APP/3.1**), is provided within ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**). The impact of road closures, diversions and the increase in construction traffic will be minimised through an OTMP (**TR10066/APP/7.5**). This will minimise potential adverse effects from increases in traffic during construction. Construction will be carried out using industry best practice and in accordance with implementation of the requirements identified in the First Iteration of the EMP (**TR010066/APP/6.**5). The requirements will minimise potential adverse effects from noise and vibration as well as dust and accidental damage. No specific measure outside these best-practice measures are recommended for temporary effects on heritage assets. During construction, the levels of vibration/ground movement at Hungerley Hall Farm will be monitored. Measures will be set out in the outline heritage mitigation strategy, as part of the First Iteration EMP (**TR010066/APP/6.1**) and secured by DCO requirement. Measures will be determined in consultation with Coventry City Council for appropriate management of this risk and is currently envisioned to involve: • An instrument monitoring system for periods when works are in proximity to the asset • thresholds set to trigger inspections and/or halting works • a procedure for agreeing appropriate management of any potential effects/concerns.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		This will minimise or remove any potential adverse effects from accidental damage to the grade II listed barns at Hungerley Hall Farmhouse that may occur as a result of ground movement during construction. In order to mitigate the impact during construction on the grade II listed yard wall at Hungerley Hall Farmhouse, a Level 3 Historic Building Recording (HBR) will be carried out. This will form a written, photographic and drawn record of the wall prior to construction. The details of this will be laid out in the outline heritage mitigation strategy as part of the EMP. Landscaping surrounding Hungerley Hall Farmhouse will screen much of the urbanising effect of the Scheme, to preserve as much rural character within its setting as is feasible. This will soften the character of the impact but cannot completely mitigate it, especially the loss of open space. The landscaping proposals are shown on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.2**). With regards to archaeological remains please refer to the response to paragraph 5.211. No specific operational mitigation measures are considered to be necessary.
5.213	Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of this requirement should be proportionate to the importance and impact. Applicants should be required to deposit copies of the report with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it.	ES Appendix 6.1 Cultural Heritage Information (**TR010066/APP/6.3**) provides a detailed discussion of baseline information including assessment of archaeological potential, contribution of setting to value / significance and of the value / significance of all identified heritage assets designated and non-designated. Design measures are proposed to mitigate the significance of effects as far as possible, as described in ES Chapter 6 (Cultural Heritage) Section 6.10 (**TR010066/APP/6.1**). ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) reports the significance of effects on heritage assets as a result of the Scheme (see Section 6.11).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The construction of the Scheme would physically affect the curtilage listed yard wall associated with the grade II Listed Buildings of Hungerley Hall Farmhouse. The proposed B4082 link road and associated landscaping would involve the demolition of the yard wall. Loss of the wall would mean that this dimension of understanding would be greatly lessened, but still possible through reference to mapping and by inference from the layout of the other buildings. The proposed Historical Buildings Record would offset impacts on this asset, which would involve preservation by record (in the form of a written, photographic and drawn record of the wall prior to construction) See response to NPS NN paragraph 5.210.
5.214	The Secretary of State may add requirements to the Development Consent Order to ensure that this is undertaken in a timely manner in accordance with a written scheme of investigation that meets the requirements of this section and has been agreed in writing with the relevant Local Authority, Historic England or Marine Management Organisation and the completeness of the exercise is properly secured.	Requirement **10** 'Archaeological remains' to the draft DCO (**TR010066/APP/3.1**) includes for a written scheme of investigation to be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and the Historic Buildings and Monuments Commission.
5.215	Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State should consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	Requirement 10 'Archaeological remains' to the draft DCO (**TR010066/APP/3.1**) includes for the following: *"10.—(1) No part of the authorised development is to commence until a heritage written scheme of investigation has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority to the extent that it relates to matters relevant to its functions.* *(2) The authorised development must be carried out in accordance with the scheme referred to in sub-paragraph (1)."* See response to NPS NN paragraph 5.211.
Decision-making		
5.216	In determining application, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset). The Secretary of State should	See response to NPS NN paragraph 5.210.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	take account of the available evidence and any necessary expertise from: • relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application • any designated records • the relevant Historic Environment Record(s), and similar sources of information • representations made by interested parties during the examination • expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it	
5.217	In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset, and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and aspect of the proposal.	See response to NPS NN paragraph 5.210. All heritage assets relevant to the Scheme have been identified from utilisation of documentary sources, a site walkover survey and archaeological field survey. ES Appendix 6.1 (Cultural heritage information)) (**TR010066/APP/6.**3) goes into detail about the heritage assets affected and has determined their value through a series of processes including the extent to which setting contributes to the assets in question. The potential significant heritage impacts have been assessed in this ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) and in ES Appendix 6.1 (Cultural Heritage Information) (**TR010066/APP/6.3**). The value (sensitivity) of heritage receptors has been assessed in accordance with DMRB LA 104 in ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**). It should be noted that Listed Buildings, because of their designation, are generally considered to be of high importance. However, assets of medium value (sensitivity) can be of medium or high importance. Although all grades of Listed Building (I, II* and II) are equally protected in law, there are three categories of grade (described further in ES Appendix 6.1 (Cultural Heritage Information)) (**TR010066/APP/6,3**). Grade II is the lowest grade and much more common than grades I and II*. All grade II Listed Buildings have been categorised with a high value (sensitivity), but this nuance

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		is taken into account in the assessment based on professional judgement and consultations with the relevant conservation officer.
5.215	Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	Protocols for the discovery of unexpected archaeological remains have been included in the First Iteration EMP (**TR010066/APP/6.5**) (EMP Appendix B.6 Unexpected archaeological finds protocol).
5.218	The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities – including their economic vitality. The Secretary of State should also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting).	The Scheme Design Report (**TR010066/APP/7.4**) states the aesthetic quality of a road and its design in relation to the places through which it passes, is integral to its function and the experience of those that use it. Good road design demonstrates sensitivity to the landscape, heritage and local community, seeking to enhance the place while being true to structural necessities. It builds a legacy for the future. The landscape design has been undertaken in accordance with 'Good Design' by integrating with the existing landscape setting and character areas, and by improving and enhancing biodiversity habitats and connectivity. The impact of the Scheme on existing ecological and heritage features has been mitigated where possible by improving habitats, providing screening and connecting the planting into existing features. Consideration has been given as to how the Scheme integrates with existing heritage assets: The Scheme bounds the grade II* Coombe Abbey Registered Park and Garden, and the grade II listed Hungerley Hall Farm its associated grade II listed barn sit within close proximity of the works. Coombe Abbey Grade II * Registered Park and Garden is located within the Coombe Abbey Park and borders the eastern boundary of the Scheme (refer to ES Figure 7.1 Landscape Policy Context (**TR010066/APP/6.2)).** The RPG is also a Conservation Area. There is very limited potential intervisibility, including in views identified by the Conservation Area Appraisal, due to screening by a thick woodland belt along Coombe Abbey Park boundary (refer to the ZTV, ES Figure 7.3 Visual Context, (**TR010066/APP/6.2**)). Effects on the setting of heritage assets including Coombe Abbey Registered Park and

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Garden are discussed within ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**). Design measures adopted to ensure integration with, and enhancement of the existing heritage assets include: • Isolated trees or small groups, along the road verge tie into the wider former parkland estate character near to Coombe Abbey Park. Specific mitigation measures in relation to Hungerly Hall Farm include a hedgerow with trees and a woodland belt in close proximity to the property and associated buildings. The proposed SuDS area at Hungerly Hall Farm landscape integration includes hedgerow planting with individual trees, scrub planting and different grassland habitats. As set out in ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**), the environmental mitigation strategy also reinstates landscape features lost due to the Scheme such as replanting of hedgerows within the Scheme, new plantation woodland, as well as general enhancement of the landscape context wherever possible. It also links in with existing landscape and heritage assets, for example by providing isolated trees or small groups, along the road verge to tie into the wider former parkland estate character near to Coombe Abbey Park.
5.219	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building, or a grade II Registered Park or Garden should be exceptional. Substantial harm to, or loss of, designated assets of highest significance, including World Heritage Sites, Scheduled Monuments,	ES Appendix 6.1 (Cultural Heritage Information) (**TR010066/APP/6.3**) provides a detailed discussion of baseline information including assessment of archaeological potential, contribution of setting to value / significance and of the value / significance of all identified heritage assets designated and non-designated. ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) reports the significance of effects on heritage assets as a result of the Scheme. See response to NPS NN paragraph 5.210 and 5.213. The Scheme will not result in substantial harm to, or loss of, World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, or Registered Parks and Gardens.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.	
5.220	Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of the development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.	ES Appendix 6.1 (Cultural Heritage Information) (**TR010066/APP/6.3**) provides a detailed discussion of baseline information including assessment of archaeological potential, contribution of setting to value / significance and of the value / significance of all identified heritage assets designated and non-designated. ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) reports the significance of effects on heritage assets as a result of the Scheme. See response to NPS NN paragraph 5.210.
5.221	Where the proposed development will lead to substantial harm to, or total loss of, significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that it is necessary to deliver substantial public benefits that outweigh that loss or harm. Alternatively, that all of the following apply: • the nature of heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible • the harm or loss is outweighed by the benefit of bringing the site back into use.	See response to NPS NN paragraph 5.210. The Scheme will not lead to substantial harm on any designated heritage assets as demonstrated in ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**).
5.222	Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefit of the proposal, including securing its optimum viable use.	See response to NPS NN paragraphs 5.210 and 5.213. The assessment has been carried out in line with relevant legislation, policy, guidance and best practice. The assessment has identified no significant adverse effects following mitigation. There are two slight adverse (not significant) effects:

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• An effect as a result of a physical impact was identified at the listed Hungerley Hall Farm. A programme of Historic Building Recording is proposed to mitigate this effect. • An effect as a result of changes to setting was identified at the listed Hungerley Hall Farm. Landscape planting is proposed to soften this impact. The Scheme area has a very low archaeological potential. Any potential effects on further unexpected archaeological remains will be mitigated through the UAFP. The impact of the Scheme on the Listed Buildings is considered to constitute "less than substantial harm". (See ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**)0.
5.223	Not all elements of a World Heritage Site or Conservation Area will necessarily contribute towards its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either as substantial harm or less then substantial harm, as appropriate. This should take into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole.	The Scheme will not affect any World Heritage Sites. Conservation Areas are considered within the historic building subject area in the ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**). The setting of Listed Buildings and conservation areas has been accounted for in the cultural heritage assessment, as reported in ES Chapter 6 (Cultural Heritage) (**TR010066/APP/6.1**) and in ES Appendices 6.1 - 6.4 (**TR010066/APP/6.3**). One of the closest designated heritage assets to the Scheme is the grade II* Registered Park and Garden of Coombe Abbey (NHLE1000408). The park is also a Conservation Area and contains a group of Listed Buildings. For the sake of ease of reference, capitalised "Park" has been used to mean the Registered Park and Garden, as well as the conservation area and the various Listed Buildings (so far as they are relevant to the Scheme). The setting of the Park makes a large contribution to its significance, with the opening and closing of views, curated approaches to the main buildings and transitions between buildings and landscape areas illustrating the internal and external relationships of the estate. Un-curated approaches index the wider rural setting of the Park, both sympathetically from the east and north and by contrast from the west and south. These heritage assets are all of high value.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The assessment has identified no significant adverse effects following mitigation.
5.224	Where the loss of significance of any heritage asset has been justified by the applicant based on the merits of the new development and the significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring, until the relevant development or part of the development has commenced.	See response to NPS NN paragraph 5.215. The draft DCO (**TR010066/APP/3.1**) includes Requirement 10 'Archaeological remains'.
5.225	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to, or better reveal, the significance of the asset should be treated favourably.	The Scheme in not within, or within the setting of, any World Heritage Sites or Conservation Areas.
5.226	Where there is evidence of deliberate neglect of, or damage to, a heritage asset the Secretary of State should not take its deteriorated state into account in any decision.	ES Appendix 6.1 Cultural Heritage Information (**TR010066/APP/6.2**) details the baseline conditions of the heritage assets. Any deterioration in the assets due to deliberate neglect or damage is not considered during the assessment of effects.
Noise and Vibration		
Applicant's assessment		
5.230	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in its noise assessment: • a description of the noise sources including the likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise • identification of noise sensitive premises and noise sensitive areas that may be affected • the characteristics of the existing noise environment	ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) considers the potential noise and vibration impacts of the Scheme. The assessment has been undertaken in accordance with British Standards 5228 parts 1 and 2 and DMRB (LA111). It addresses the points listed in NPS NN paragraph 5.230 and covers daytime and night-time periods, weekdays and weekends. ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) sets out and summarises potential impacts to the nearby human population via numerical determination. Changes to health outcomes for the health determinant of noise, or on other receptors such as cultural heritage sites or protected species and wildlife can be viewed in the relevant chapters as detailed below:

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	• a prediction on how the noise environment will change with the proposed development • in the shorter term such as during the construction period • in the longer term during the operating life of the infrastructure • at particular times of the day, evening and night (including weekends) as appropriate • an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas, including identifying whether any particular groups are more likely to be affected • measures to be employed in mitigating the effects of noise applicants should consider using the best available techniques to reduce noise impacts.	• Cultural Heritage – Chapter 6 (**TR010066/APP/6.1**). • Biodiversity – Chapter 8 (**TR010066/APP/6.1**). • Population and Human Health – Chapter 12 (**TR010066/APP/6.1**). ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) considers the construction and operational offline impacts where appropriate. ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) recognises that during construction, there is the potential for residents and members of the communities to be temporarily affected by increases of noise disturbance. The detailed assessment is contained within the appendices of ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) and ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**). Noise modelling has informed the ecological assessment. Ecological noise sensitive receptors and an assessment of the impacts is presented in summary in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) and in detail in ES Appendix 8.16 (Noise Impacts Upon Ecological Receptors) (**TR010066/APP/6.3**). ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) identifies all noise sensitive receptors within the study area including external areas with recreational or amenity value in Section 11.8 (Baseline conditions), and presents assessments of likely significant effects in Section 11.11 (Assessment of likely significant effects). In ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) a construction noise assessment has been undertaken, identifying that adverse impacts that are likely to constitute significant effects would occur without mitigation at some of the receptors closest to construction works. This includes identifying changes in traffic noise levels due to construction traffic and determining the operational significance on noise sensitive building. A total of 838 existing noise sensitive receptors have been identified within the 300m construction noise study area, not including seven PRoW and amenity areas.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Suitable means of minimising the potential for significant adverse have been presented including the provision of temporary acoustic barriers. It is also necessary for the Principal Contractor to carry out further detailed construction noise assessments for overnight or weekend works where these could affect sensitive receptors for 10 or more days or nights in any 15 consecutive days or nights. Where all mitigation is implemented effectively, significant residual construction noise effects will be reduced but may still occur. Furthermore, there are receptors that could experience significant effects due to noise from night-time or weekend works and this will also need further consideration once further detail regarding the scope and duration of these works has been defined. A construction traffic assessment has been undertaken. It is concluded that, provided that the anticipated vehicle movements and routes are restricted as described in ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) and defined in the OTMP (**TR010066/APP/7.5**) potential significant effects are unlikely. Consideration has been given to the traffic diversion routes during road closures required to undertake the construction works. It is concluded that, as diversion routes will occur at night and will utilise local roads, the noise changes due to diverted traffic are highly likely to cause disturbance at receptors within 25m of the road. On this basis, mitigation measures, including use of varying routes, and advance notice to residents, are proposed. During operation there is the potential for changes to traffic flows and road alignment to result in noise changes at noise sensitive receptors, particularly from increased road traffic. The assessment of operational noise includes embedded mitigation in the form of a low noise surface along high-speed sections of the Scheme. The assessment of operational noise demonstrates that there are no significant adverse noise effects expected due to changes in road traffic noise. This applies to all receptors within the study area and the Noise Important Areas (NIAs) identified outside of the study area.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The assessment identifies proportionate and reasonable actions to avoid significant adverse impacts on health and quality of life from noise and vibration as a result of the Scheme, providing compliance with the main objectives of the National Planning Policy Framework, Noise Policy Statement for England, Planning Practice Guidance on noise and NPS NN.
5.231	The nature and extent of the noise assessment should be proportionate to the likely noise impact.	See response to NPS NN paragraph 5.230 above.
5.232	The potential noise impact elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on national networks, should be considered as appropriate.	See response to NPS NN paragraph 5.230. As set out in ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) There are no NIAs located within 1km of the Order Limits. However, there are a number of NIAs located on surrounding roads. These include: • One on the A46 south of the Binley Junction, >1.5km from the existing Walsgrave Junction (ID 14307) • Three NIAs situated on the A4600 Antsy Road (IDs 324 (approximately 2.4km north, 11796 (approximately 1.5km west) and 14385 (approximately 1.6km north-west) of the existing Walsgrave Junction) • Two on the A428 Brandon Road (ID 330, approximately 1km south-west)) and Binley Road (ID 11800, approximately 1.25km south-west) of the existing Walsgrave Junction The assessment of operational noise demonstrates that there are no significant adverse noise effects expected due to changes in road traffic noise. This applies to all receptors within the study area and the NIAs identified outside of the study area.
5.233	Operational noise, with respect to human and structural receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise (Department for Transport 1988) or any official published succession to this methodology. The prediction of noise from railways should be based	ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) considers the potential noise and vibration impacts of the Scheme. The assessment has been undertaken in accordance with British Standards 5228 parts 1 and 2 and DMRB (LA111).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	on the method described in the Calculation of Railway Noise (Department for Transport 1988) or any official published succession to this methodology. For the prediction, assessment and management of construction noise, reference should be made to the relevant British Standards and other guidance which also gives examples of mitigation strategies.	As part of the assessment, a baseline noise survey was carried out in between January and March 2024 at positions representing the local roads likely to be affected by the Scheme. Environmental noise levels measured during the survey have been analysed to determine the UK road traffic noise index, dB LA10,18hr, at each position in full accordance with the Calculation of Road Traffic Noise (CRTN) shortened methodology. Full details of the baseline survey are presented in ES Appendix 11.3 (**TR010066/APP/6.3**). The measured road traffic noise levels have then been compared with the Do Minimum Opening Year (DMOY) scenario road traffic noise model to determine whether any adjustment to the model is necessary. This is discussed further in section 11.8.
5.234	The applicant should consult Natural England with regard to the assessment of noise on designated nature conservation sites, protected landscapes, protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.	The Applicant has consulted with Natural England during the development of the Scheme as detailed in the Consultation Report (**TR010066/APP/5.1**) and throughout the ES Chapters (**TR010066/APP/6.1**). ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**)) states the works will not materially affect the acoustic character of the area or result in obvious landscape changes (during operation). As such it can be appropriate to conclude that a moderate change in the short-term is not likely significant. ES Chapter 7 (Landscape and Visual Effects) (**TR010066/APP/6.1**) considers landscape designations. See the response to NPS NN paragraph 5.230. Noise modelling has informed the ecological assessment. Ecological noise sensitive receptors and an assessment of the impacts is presented in summary in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) and in detail in ES Appendix 8.16 (Noise Impacts Upon Ecological Receptors) (**TR010066/APP/6.3**). which assesses the predicted effects on internationally, nationally and locally designated sites and other habitats and species. Any potential noise impacts on protected species and wildlife (including the SSSI) are addressed within Section 8.9 Potential Impacts and Section 8.11 (Assessment of Likely Significant Effects) within ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		As summarised in ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**)), the construction noise assessment identified that adverse impacts that are likely to constitute significant effects would occur without mitigation at some of the receptors closest to construction works. ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) provides more detail in section 8.13. The assessment undertaken has identified significant residual effects for noise impacts upon the Coombe Pool SSSI during construction. This assessment does not consider any mitigation and thus presents the worst-case in the event that mitigation is not practicable. To reduce noise levels it is proposed that one option is to install a 2m high noise barrier along the boundary of the SSSI (at the bottom of the embankment) for the duration of construction works that lead to significant noise effects. The two panels displayed within ES Figure 8.3 (Proposed Construction Mitigation Noise Barrier – December 2026) (**TR010066/APP/6.2**). Daytime show graphically the difference in absolute noise levels between existing conditions and the day with the highest noise levels within that month. The top panel of ES Figure 8.3 shows the noise change without additional mitigation and the bottom panel indicates the likely reduction in noise levels from the proposed 2m noise barrier, which is aligned along the existing post and rail fence line on the SSSI boundary. As shown on the Figure, a noise barrier would reduce the area of the SSSI and specifically the pool which would experience changes in noise >5.0dB. However, much of the pool would still experience noticeable noise change >3dB. Therefore, further mitigation options, which may include programming of works to avoid sensitive periods and/or use of quieter machinery, would be developed at detailed design where practicable to further reduce the noise levels impacting the SSSI during construction. These mitigation measures will be discussed with Natural England and detailed in the Second Iteration EMP. For the purposes of this assessment the worst case has been presented. No residual significant effects are anticipated during operation with the proposed mitigation.
Mitigation		

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.235	The Examining Authority and the Secretary of State should consider whether mitigation measures are needed for both operational and construction noise over and above any which may form part of the project application. The Secretary of State may wish to impose requirements to ensure delivery and future maintenance of all mitigation measures.	The First Iteration EMP (**TR010066/APP/6.5**) and Section 11.11 of ES Chapter 11 Noise and Vibration ES (**TR010066/APP/6.1**) details the design of mitigation proposed in relation to the Scheme. The First Iteration EMP (**TR010066/APP/6.5**) will be developed into a Second Iteration EMP for each part for implementation during construction, and is secured through Requirement 4 of the draft DCO (**TR010066/APP/3.1**).
5.236	Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following: • engineering - containment of noise generated • materials: use of materials that reduce noise, (for example, low noise road surfacing) • lay-out - adequate distance between source and noise-sensitive receptors • incorporating good design - to minimise noise transmission through landscaping and screening by natural or purpose-built barriers including topographical changes • administration - specifying appropriate noise criteria or times of use (for example, in the case of railway station public address systems)	The First Iteration EMP (**TR010066/APP/6.5**) and Section 11.11 of ES Chapter 11 Noise and Vibration (**TR010066/APP/6.1**) details the design of mitigation proposed in relation to the Scheme. Mitigation measures in this section are secured in by the First Iteration EMP (**TR010066/APP/6.4**) and are in line with the aims and associated actions of NPS NN as detailed in DMRB LA 111 Table E/1.3. These include, for example during construction: • Timing of construction works to normal construction hours. • Temporary noise barriers. • Ensure the proposed plant noise emissions are similar or below the preliminary construction plant noise levels used within this assessment. • Use of equipment that is fitted with silencers or mufflers. • Use of set routes for construction traffic and not local roads. During operation: • As part of the Scheme, sections of the roads within the Order Limits A46 dual carriageway shall be surfaced with a low-noise road surface. The assessment concludes that mitigation in the form of noise barriers is not necessary to avoid significant adverse operational noise effects at residential receptors and therefore these have not been included. Mitigation measures of relevance during construction are included within the First Iteration EMP (**TR010066/APP/6.4**) which will be developed into a Second Iteration EMP for implementation during construction of the Scheme. A Construction Noise and Vibration Management Plan will also be prepared in full as part of the Second Iteration EMP prior to construction commencing. Details on the First and Second Iteration EMPs, including how mitigation is

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		secured within the draft DCO (**TR010066/APP/3.1**), is provided within section 4.8 of ES Chapter 4 (Environmental Assessment Methodology) (**TR010066/APP/6.1**). Any works carried out during the pre-commencement period will be undertaken in accordance with the mitigation measures contained in the Pre-Commencement Plan (**TR010066/APP/6.7**).
5.237	For most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on, and provide powers to, the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with construction and operational noise. An indication of the likely eligibility for such compensation should be included in the assessment. In extreme cases, the applicant may consider it appropriate to provide noise mitigation, through compulsory acquisition of affected properties in order to gain consent for what might otherwise be an unacceptable development. Where mitigation is proposed to be dealt with through compulsory acquisition, such properties would have to be included within the Development Consent Order land in relation to which compulsory acquisition powers are being sought.	The First Iteration EMP (**TR010066/APP/6.5**) and Section 11.11 of ES Chapter 11 Noise and Vibration ES (**TR010066/APP/6.1**) details the design of mitigation proposed in relation to the Scheme. The assessment has not identified significant noise effects that would require soundproofing or purchase of properties.
5.238	Applicants should consider opportunities to address the noise issues associated with Important Areas as identified through the noise action planning process.	See the response to NPS NN paragraphs 5.230 and 5.241.
Decision-making		
5.239	Developments must be undertaken in accordance with statutory requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the government's associated planning guidance on noise.	ES Appendix 11.2 (Legislation and Policy Framework) (**TR010066/APP/6.3**) identifies the legislation, policy, regulations, guidance and standards that are relevant to this assessment, including the Noise Policy Statement for England.
5.240	The project should demonstrate good design through optimisation of scheme layout to minimise noise emissions and, where practicable and sustainable, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project should also consider the need for the	The First Iteration EMP (**TR010066/APP/6.5**) and Section 11.9 of ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) details the design of mitigation proposed in relation to the Scheme.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	mitigation of impacts elsewhere on the road and rail networks that have been identified as arising from the development, according to government policy.	Reducing the environmental effects of the road, is an objective for the Scheme, and the Scheme layout responds to this objective. Reducing noise impacts of the road are central to meeting these objectives. A summary of the mitigation which is proposed to minimise noise emissions includes time limitations on construction works, temporary noise barriers, best practice on-site during construction, good communication with local residents avoiding using local roads, landscaping and low noise surfacing.
5.241	The Secretary of State should not grant development consent unless satisfied that the proposals will meet the following aims, within the context of government policy on sustainable development: • avoid significant adverse impacts on health and quality of life from noise as a result of the new development • mitigate and minimise other adverse impacts on health and quality of life from noise from the new development • contribute to improvements to health and quality of life through the effective management and control of noise, where possible.	ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) summarises the noise effects of the Scheme, the Chapter is accompanied by a number of technical ES Appendices (**TR010066/APP/6.3**) which set out the detailed assessments undertaken, including: • ES Appendix 11.3: Baseline noise survey • ES Appendix 11.4: Model validation • ES Appendix 11.5: Construction noise assessment At set out in ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**), table E/1.3 of DMRB LA111 defines a significant adverse noise effect in NPS NN policy terms as a noise level above SOAEL. • ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**) goes on to summaries the results of the detailed noise assessments undertaken in the appendices (**TR010066/APP/6.1**). Noise levels are predicted to be below the SOAEL for construction noise when including for the mitigation measures detailed in section 11.10. Existing operational noise within the study area exceeds the SOAEL at some receptors. Operational noise from the Scheme, considering the mitigation measures detailed in section 11.10 in ES Chapter 11 (Noise and Vibration (**TR010066/APP/6.1**): is not predicted to result in significant increases at receptors with noise levels which currently exceed the SOAEL. No properties qualify for noise insultation. • All design and mitigation measures (actions) to minimise adverse impacts are detailed in section 11.10 in ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Measures include a noise reducing surface along high-speed sections of the Scheme to mitigate operational noise, and temporary noise barriers and use of best practicable means to mitigate construction noise. Mitigation measures are detailed in the First Iteration EMP (**TR010066/APP/6.4**) and the OTMP (**TR010066/APP/7.5**) and secured as a requirement in the draft DCO (**TR010066/APP/3.1**). Management plans are included in the First Iteration EMP (**TR010066/APP/6.5**) and include · EMP Appendix B.2 Outline Construction Noise and Vibration Management Plan. · The Second Iteration EMP will be produced which reflect the mitigation measures required by the REAC (Appendix A of First Iteration EMP (**TR010066/APP/6.5**)) and set out in the ES and includes various management plans and method statements. This is secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**). This includes a Construction Noise and Vibration Management Plan; The EMP (Third Iteration) as set out in Requirement 5 to the draft DCO (**TR010066/APP/3.1**) will set out measures to be adopted during the operational phase. • As a result of the measures (actions) proposed in section 11.10 in ES Chapter 11 (Noise and Vibration) (**TR010066/APP/6.1**): noise emissions from construction and operation are reduced. No perceptible change in road traffic noise levels is expected at NIAs. Reductions in operational noise occur at some receptors as a result of the Scheme.
5.242	In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the noise levels from the project do not exceed those described in the assessment or any other estimates on which the decision was based.	The First Iteration EMP (**TR010066/APP/6.5**) details the noise mitigation proposed in relation to the Scheme. The First Iteration EMP will be developed into a Second Iteration EMP for each part for implementation during construction, and is secured through Requirement 4 of the draft DCO (**TR010066/APP/3.1**)
Socio-economic impacts		

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Introduction		
5.243	The construction and operation of nationally significant infrastructure projects may have short or longer term economic and social impacts on local communities, businesses or services. The construction period for significant projects can be lengthy; however, this can generate employment through the construction period and benefit the local economy. Applicants should look maximise local employment opportunities during construction and operational phases.	ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) considers the potential significant socio-economic effects of the Scheme. Section 5 of the Case for the Scheme (**TR010066/APP/7.1**) summarises the economic assessment of the Scheme. The A46 Walsgrave Scheme generates a Present Value Benefit (PVB) of £82.4 million and a Present Value Cost (PVC) of £56 million. This results in an initial BCR of 1.47 which suggests that for each pound of Broad Transport Budget expenditure, £1.47 of benefit to public value is expected to be generated. In line with TAG guidance, WEIs and JTR are not part of the Level 1 BCR and therefore these are considered in the Level 2 benefits and the corresponding adjusted BCR. The Scheme generates an adjusted PVB of £100.11 million and a BCR of 1.78 when the Level 2 benefits are included. Compliance with the NPS NN would also be an ongoing aim of the detailed design process to deliver environmental and social benefits. The Equality Impact Assessment (**TR010066/APP/7.6**) sets out that there will be opportunities for local employment to fill a demand in construction-related roles. The construction sector offers a range of opportunities across different trades and is a major source of national employment. The ripple effect of local construction can lead to positive externalities including increased employment, opportunities for businesses and more spending within the local community. Mitigation measures are detailed in section 10.10 of ES Chapter 10 (Material Assets and Waste) (**TR010066/APP/6.1**) and are secured in the First Iteration EMP (**TR010066/APP/6.5**). Commitment *MA4: local and responsible sourcing of material assets* of the EMP (REAC Appendix A) states: The principles of local and responsible sourcing of key material assets will be adopted by the Principal Contractor in accordance with their policies on sustainable procurement: • where feasible, key materials, such as aggregates, asphalt, cement, concrete and steel used within the Scheme will be

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		sourced from suppliers who have a minimum International Organization for Standardization (ISO) 14001 certification (or equivalent) and, if available, Buildings Research Establishment (BRE) developed BES 6001 (Framework Standard for the Responsible Sourcing of Construction Products) certification for the material • in accordance with the UK government Timber Procurement Policy (TPP), only timber and wood-derived products originating from an independently verifiable legal and sustainable source (which can include from a licensed Forest Law Enforcement, Governance and Trade partner) will be used. Appropriate documentation will be required to prove it. The guidance details what 'legal' and 'sustainable' mean in the context of the TPP • locally sourced materials and suppliers, ideally within 10 kilometres, would be identified and used, where possible. Staff will be involved in construction and management of the Scheme. This may present a considerable employment opportunity in the area and can be used to maximise the social value of the Scheme.
Applicant's assessment		
5.244	Where the project is likely to have socio-economic impacts at local or regional level, the applicant should undertake and include in their application an assessment of these impacts.	Section 5 of the Case for the Scheme (**TR010066/APP/7.1**) summarises the economic assessment of the Scheme. The A46 Walsgrave Scheme generates a Present Value Benefit (PVB) of £82.4 million and a Present Value Cost (PVC) of £56 million. This results in an initial BCR of 1.47 which suggests that for each pound of Broad Transport Budget expenditure, £1.47 of benefit to public value is expected to be generated. In line with TAG guidance, WEIs and JTR are not part of the Level 1 BCR and therefore these are considered in the Level 2 benefits and the corresponding adjusted BCR. The Scheme generates an adjusted PVB of £100.11 million and a BCR of 1.78 when the Level 2 benefits are included.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.245	This assessment should consider all relevant socio-economic impacts which may include: • the creation of jobs and training opportunities applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to net zero • the value of increased connectivity on productivity and access to jobs, services and housing • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities applicants should engage with local businesses and the local community at the pre-construction phase to understand the opportunities for businesses and the community throughout construction, such as employment or educational programmes • any indirect beneficial impacts for the region hosting the infrastructure, particularly in relation to the use of local support services and supply chains • effects on tourism • cumulative effects – if development consent were to be granted to for a number of projects within a region and these are developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.	Section 5 of the Case for the Scheme (**TR010066/APP/7.1**) summarises the economic assessment of the Scheme (see response to NPS NN paragraph 5.244) The A46 is a nationally significant trade and export route. There are ports at either end of the corridor and both East Midlands and Birmingham airports are close by. It is an area that's already busy and which is forecast to become even busier in the coming years due to planned developments across the region. Modelling analysis indicates that the forecasted local and regional traffic growth will cause a significant increase in delays at Walsgrave Junction and along the A46 and B4082. As set out in the Transport Assessment (**TR010066/APP/7.3**), the Scheme provides the required capacity improvements to allow for the forecasted traffic growth. The modelling analysis shows the Scheme fulfils its objectives by providing capacity, relieving congestion, improving journey times and increasing accessibility for the local communities. The Scheme provides opportunities for economic growth and improved accessibility within Coventry and Warwickshire, enabling the unlocking of sites for residential development, such as the allocated land to the west of the A46 and improving access to existing commercial areas. ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**) considers the likely cumulative effects of the Scheme together with proposed and committed developments. See the response to NPS NN paragraph 4.12.
5.246	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to the development's socio-economic impacts correlate with local planning policies.	ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) demonstrates the identification and assessment of likely significant effects on population and human health. Section 12.3 of this Chapter identifies the main legislative framework relevant to this assessment of population and human health. This Chapter reports on the potential impacts of the Scheme on the following sub-topics of land-use and accessibility:

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• private property and housing • community land and assets • development land and businesses • agricultural land holdings • WCH ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) also reports on the impacts of the Scheme on the health of local communities drawing on the assessments from other ES chapters where relevant. This includes setting out the study area (section 12.7) and baseline conditions section 12.8). The Case for the Scheme Section 6 (**TR010066/APP/7.1**) demonstrates that the Scheme is compliant with local and national planning policy. Section 5.10 of the Case for the Scheme (**TR010066/APP/7.1**) describes the social impacts of the Scheme which covers the human experience of the transport system and its impact on social factors that are not considered as part of economic or environmental impacts.
Mitigation		
5.248	The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	See response to NPS NN paragraph 5.246. The design of the Scheme has been considered throughout and design decisions are reported in the Scheme Design Report (**TR010066/APP/7.4**). An EIA has been undertaken, and proposals developed to mitigate likely significant environment effects arising from the Scheme. Where specific design, mitigation and enhancement measures have been applied, these are reported under each individual technical chapter of the ES (**TR010066/APP/6.1**) and are summarised in the ES Non-Technical Summary (**TR010066/APP/6.4**). The Equality Impact Assessment (**TR010066/APP/7.6**) sets out that there will be opportunities for local employment to fill a demand in construction-related roles. The construction sector offers a range of opportunities across different

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		trades and is a major source of national employment. The ripple effect of local construction can lead to positive externalities including increased employment, opportunities for businesses and more spending within the local community.
Decision-making		
5.250	The Secretary of State should have regard to the potential socio-economic impacts of new infrastructure identified by the applicant and from other sources that the Secretary of State considers to both relevant and important to its decision.	The Scheme will upgrade the existing Walsgrave Junction to alleviate congestion and improve journey times along the A46 corridor. In turn, this will provide multiple socio-economic benefits for communities and businesses within the wider area as shown throughout the Case for the Scheme (**TR010066/APP/7.1**). This includes an economic assessment in Section 5, which includes details of the social -economic impacts of the Scheme. The Scheme also provides a range of environmental benefits which are detailed throughout the ES (**TR010066/APP/6.1**). See response to NPS NN paragraphs and 5.248.
5.242	The Secretary of State should consider any relevant positive provisions, the applicant has made, or is proposing to make, to mitigate impacts (for example through planning obligations), and any legacy benefits that may arise. As well as any options for phasing development in relation to socio-economic impacts.	See response to NPS NN paragraph 5.243, 5.245 and 5.248. The Scheme design has considered local community access to the road network and reduce impacts during construction and operation on users, communities and the environment. These aspects are set out in ES Chapters 5-15 (**TR010066/APP/6.1**) with mitigation for adverse impacts caused by the Scheme embedded into the design. An OTMP (**TR010066/APP/7.5**) which shows how traffic will be managed to reduce impact on the local communities during construction, and First Iteration Environmental Management Plan (EMP) (**TR010066/APP/6.5**) which shows how the environmental impacts will be managed and mitigated during various activities for the construction and operation of the Scheme, accompany the application. The OTMP (**TR010066/APP/7.5**) consists of seven phases. These are subject to change following the detailed design phase of the Scheme. All existing routes are maintained during the day time under reduced speed limits while traffic management is in place and supplemented by a limited number of overnight closures for varying sections of the route.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Mitigation measures are to be arranged in consultation with local stakeholders and the local authorities, Coventry City Council. The programme of works will be co-ordinated in a fashion that allows optimum use of full closures in order to minimise the number required and promote operational efficiency. Full closures will be co-ordinated with local highways authorities (such as Warwickshire County Council, Coventry City Council and Rugby Borough Council), and discussed via stakeholder engagement.
Water quality and resources		
Introduction		
5.253	The planning system should contribute to and enhance the natural and local environment by, amongst other things, preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, water pollution. The government has issued guidance on water supply, wastewater and water quality considerations in the planning system. Where applicable, an application for a Development Consent Order has have regard to the water body objectives of the River Basin Management Plan where the project is located and avoid or mitigate deterioration of water bodies in the area.	Design considerations, mitigation measures and residual risks are described in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), supported by detailed studies in ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) and ES Appendix 13.2 (Water Framework Directive Compliance Assessment) (**TR010066/APP/6.3**). ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) has considered water bodies in a River Basin Management Plan within Section 4.2 of ES Appendix 13.2 (Water Framework Directive Compliance Assessment) (**TR010066/APP/6.3**). The purpose of the WFD compliance assessment report is to establish the nature and magnitude of the impacts of any components of the Scheme which are anticipated to affect WFD classification elements of the water bodies. The Scheme is located within the Avon Urban Rivers and Lakes Operational Catchment, within the Severn River Basin District. The WFD status, objectives and programme of measures derived by the Environment Agency for water bodies located within this river basin district are outlined within the 2022 Severn River Basin Management Plan (RBMP) (Environment Agency, 2022). The key objectives of the WFD, provided in the Severn (RBMP), are: • Prevent deterioration, enhance and restore bodies of surface water, achieve good chemical and ecological status of such water

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		and reduce pollution from discharges and emissions of hazardous substances. • Protect, enhance and restore all bodies of groundwater, achieve good chemical and quantitative status of groundwater, prevent the pollution and deterioration of groundwater, and ensure a balance between groundwater abstraction and replenishment. • Preserve protected areas. WFD is implemented through the process of river basin management planning. Stage 3 considers the potential impacts of each activity that has been screened in, identifies ways to avoid or minimise impacts, and assesses if the activity may cause deterioration or jeopardise the water body achieving its objectives. Any identified impacts as a result of the Scheme which have the potential to cause deterioration or jeopardise the water body achieving its objectives will require appropriate mitigation methods to reduce the impacts. Section 6.1 of ES Appendix 13.2 (Water Framework Directive Compliance Assessment) (**TR010066/APP/6.3**) identifies the potential impacts the Scheme may have on receptors identified at the scoping stage. This is based on an assessment of the residual impact and requirement for further investigation for each WFD receptor. The Scheme has the potential to affect a number of WFD water bodies present within the zone of influence (ZOI). An assessment of the compliance of the Scheme with the objectives of the WFD is therefore provided. The following WFD surface water bodies have been scoped in for further assessment: • Withy Bk - source to conf R Sowe Water Body (GB109054044640) • Smite Bk - source to conf R Sowe Water Body (GB109054044630) • Sowe – conf Withy Bk to conf R Avon Water Body (GB109054044540) • Sowe - conf Breach Bk to conf Withy Bk (GB109054044660) • Coombe Pool Water Body (GB30937926)

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Contaminants from runoff or accidental spillage represent the largest potential risk for degradation of the identified receptors. Mitigation during the construction phase would be managed through the implementation the Water Monitoring and Management Plan developed as part of the Second Iteration EMP which will include best practice measures to limit the risk of pollutants entering surface water features. A Highways England Water Risk Assessment Tool (HEWRAT) assessment was undertaken to assess potential water quality impacts during the operation phase. The results identified that all catchment areas pass the routine runoff assessment, two of which required mitigation. All catchment areas passed the accidental spillages assessment without the need for mitigation included in the design. Works within the channel is required due to infilling of watercourses 1 and 3, the construction of a temporary culvert over watercourse 1 and construction of two new outfalls (one on a new drainage channel and one on watercourse 2) have the potential to impact the hydromorphology of the watercourse and downstream receptors. However, the temporary culvert and outfalls would be designed to minimise effects on hydromorphology and ensure there is no loss of habitat or biodiversity. This would ensure there is a negligible risk to WFD receptors of the River Sowe. The potential spread of invasive non-native species (INNS) during construction would be mitigated and outlined in an Invasive Non-Native Species Management Plan (INNSMP). The Second Iteration EMP would reduce the risk associated with INNS and therefore the risk is considered negligible. The Scheme activities do not propose heavy modification to the Coombe Pool water body and are unlikely to restrict the implementation of any potential measures highlighted by the Environment Agency. The Scheme is not anticipated to impact the ability for the four mitigation measures to be completed. Therefore, at this stage of the assessment, the Scheme should not prevent this water body from meeting good ecological potential. The WFD compliance assessment indicates any impacts are likely to be temporary and highly localised due to the construction approach along with the design and mitigation in place for the operational phase of the Scheme. Due to

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		this, the Scheme is compliant with the objectives of the WFD, and it is concluded there is no significant risk to any WFD water bodies.
Applicant's assessment		
5.254	Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing or water quality activity or groundwater activity permits, and with relevant water undertakers. Where development is likely to have adverse effects on the water environment, the applicant should undertake an assessment of the existing status and impacts of the proposed project on water quality, water resources and physical characteristics of the water environment as part of the Environmental Statement or equivalent. The assessment should also include how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment (see paragraphs 4.33 to 4.44).	Early engagement was undertaken with the Environment Agency and the local authorities regarding water resources, and they were consulted on the Environmental Scoping Report (**TR010066/APP/6.8**) in June 2023. Consultee comments were received in response to the Environmental Scoping Report (**TR010066/APP/6.8**) as presented in the Scoping Opinion (**TR010066/APP/6.9**). The Applicant's responses to the Scoping Opinion (**TR010066/APP/6.8**) are contained in the ES Appendix 4.1 Scoping Opinion Response Table (**TR010066/APP/6.3**). Responses in relation to the statutory consultation held between October and December 2023 are presented in the Consultation Report (**TR010066/APP/5.1**). The Environment Agency has been consulted throughout the development of the Scheme. Further details can be found in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) and in the Water Framework Directive Compliance Assessment (ES Appendix 13.2 (**TR010066/APP/6.3**)). See the response to NPS NN paragraph 5.253. ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**) consider the impact of flooding as a result of climate change and describe how the Scheme has been designed to minimise the risk of flooding as a result of the new works, and also the risk of flooding to the Scheme, by incorporating current design standards and future climate change allowances to improve its resilience. ES Chapter 14 (Climate) (**TR010066/APP/6.1**) considers the Scheme's effect on climate (i.e. increases in carbon emissions) as well as the potential vulnerability of the Scheme to climate change (i.e. the resilience of Scheme assets to projected changes in climate).

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		Details of other regulatory consents to be sought for the Scheme not secured under the draft Development Consent Order (**TR010066/APP/3.1**) relating to water are set out in the Consents and Agreements Position Statement (**TR010066/APP/3.3**). A water abstraction transfer licence is likely to be required under Section 24 of the Water Resources Act 1991 (as amended by the Water Act 2003) and the Water Abstraction and Impounding (Exemption) Regulations 2017. Under Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016, a discharge environmental permit would be required for dewatering discharges during the construction phase. The provisions of the Reservoir Act 1975 will ensure that Controlled Reservoirs are managed and operated to minimise the risk of flooding due to an uncontrolled release of water resulting from dam failure in order to protect people, the environment, cultural heritage and economic activity.
5.255	For those projects that are improving the existing infrastructure, such as road widening, opportunities should be taken, where feasible, to improve the quality of existing discharges where these are identified and shown to contribute towards water body quality failures under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 ("Water Framework Directive Regulations") commitments. A permit under the Environmental Permitting Regulations may also be required where improvements are being made to existing infrastructure, for example, the discharge of contaminated water from roads.	See ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) and the Water Framework Directive Compliance Assessment (ES Appendix 13.2 (**TR010066/APP/6.3**)). See the response to NPS NN paragraph 5.253. ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) is supported by the following ES Figures (**TR010066/APP/6.2**), which provide illustrative information: • ES Figure 13.1: Surface water features, licensed abstractions, consented discharges and fluvial flood risk: • ES Figure 13.2: WFD surface waterbody catchments • ES Figure 13.3: Pluvial flood risk • ES Figure 13.4: Aquifer and environmental designations • ES Figure 13.5: WFD groundwater bodies • ES Figure 13.6: Groundwater abstractions and source protection zones

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		• ES Figure 13.7: Susceptibility to groundwater flooding Proposed construction activities include two new outfalls one of which is to an existing watercourse and one to a new proposed highway drainage ditch temporary culverting, partial infilling and severance of two watercourses. An ordinary watercourse consent from Coventry City Council and Warwickshire County Council would be required before any construction works within ordinary watercourses are undertaken (Commitment RD7 of the REAC, Appendix A of the First Iteration EMP (**TR010066/APP/6.5**)). A water monitoring and management plan would be developed to complement the existing baseline water level and water quality monitoring dataset. The water level and water quality monitoring would provide a potential early warning of potential groundwater impacts arising from construction activities, for example pollution incidents. It would also provide data to confirm that a perceived impact has not occurred, for example ground settlement due to temporary dewatering. The water monitoring plan would be included in the Second Iteration EMP which is secured under Requirement 4 of Schedule 2 of the draft DCO (**TR010066/APP/3.1**) (Commitment RD3 of the REAC, Appendix A of the First Iteration EMP (**TR010066/APP/6.5**)). The Drainage Strategy Report (ES Appendix 13.6 (**TR010066/APP/6.3**)) proposes all road drainage will drain by surface water outfalls discharging to the River Sowe and Smite Brook. The proposed highway drainage will discharge to six locations, utilising two new outfalls on tributaries of the River Sowe. The location of the outfalls can be found in Annex A of ES Appendix 13.3 (WQA) (**TR010066/APP/6.3**). There is an intention in the proposed drainage design to provide a vegetated detention basin on catchment 3 to attenuate runoff (Commitment RD10 of the REAC, Appendix A of the First Iteration EMP (**TR010066/APP/6.5**)). As this is not required water quality mitigation, it would provide a betterment through further biodiversity and water quality enhancements. The provision of filter drains is to be considered further during detailed design, due to the potential risk to groundwater. Should filter drains remain in the design, it is considered

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		these will result in a betterment, providing further suspended sediment and dissolved zinc removal benefits, as they are not required for mitigation. Details of other regulatory consents to be sought for the Scheme are set out in the Consents and Agreements Position Statement (**TR010066/APP/3.3**). Environmental permits will be applied for separately.
5.256	Under the Environmental Permitting Regulations, applicants are required to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids. For example, from car parks or other areas of hard standing, during operation. Consent may be required for working near to a river from the Environment Agency and a pollution incident response plan is recommended.	The First Iteration EMP (**TR010066/APP/6.5**) sets out the control of processes, emissions and discharges through the construction process, including potential discharges to the water environment. The Second Iteration EMP will be produced which reflect the mitigation measures required by the REAC and set out in the ES and includes various management plans and method statements. This is secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**). Details of other regulatory consents to be sought for the Scheme are set out in the Consents and Agreements Position Statement (**TR010066/APP/3.3**). The First Iteration EMP (**TR010066/APP/6.5**) sets out the control of processes, emissions and discharges through the construction process, including potential discharges to the water environment. The Second Iteration EMP will include a Water Monitoring and Management Plan. This is secured by Requirement 4 to the draft DCO (**TR010066/APP/3.1**). Contaminants from runoff or accidental spillage represent the largest potential risk for degradation of the identified receptors. Mitigation during the construction phase would be managed through the implementation the Water Monitoring and Management Plan which will include best practice measures to limit the risk of pollutants entering surface water features. A Highways England Water Risk Assessment Tool (HEWRAT) assessment was undertaken to assess potential water quality impacts during the operation phase. The results identified that all catchment areas pass the routine runoff assessment, two of which required mitigation. All catchment areas passed the accidental spillages assessment without the need for mitigation included in the design.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.257	Applicants should consider protective measures to control the risk of pollution; this could include, for example, the use of protective barriers.	See response to NPS NN paragraph 5.256.
5.258	Any assessment for both the construction and operational phases of the development should describe: • the existing quality of waters affected by the proposed project, and how climate change will impact on this • existing water resources affected by the proposed project, the impacts of the proposed project on water resources, and how climate change will impact on this • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive Regulations and source protection zones around potable groundwater abstractions; and how climate change will impact on this • any cumulative effects	An assessment has been undertaken and is provided in the following documents: • ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) • the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) • the WFD Compliance Assessment (ES Appendix 13.2 (**TR010066/APP/6.3**)) • ES Chapter 14 (Climate) (**TR010066/APP/6.1**) • ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**). A baseline assessment utilising a desktop review and a water feature survey has been carried out to identify important water feature receptors that may be affected by the Scheme. The CCA 2008 has been considered within this ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) and the ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) to apply future climate change allowances to assess future flood risk. A Water Quality Assessment (ES Appendix 13.3 (**TR010066/APP/6.3**)) and Groundwater Assessment (ES Appendix 13.4 (**TR010066/APP/6.3)**) has been prepared to assess the impacts to surface water and groundwater quality arising from the Scheme. See the response to NPS NN paragraph 5.253 with regards to the WFD regulations and water bodies. ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**) Table 15.2 recognises potential single project residual effects between topics

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		on receptors during construction of the Scheme. For the water environment it is anticipated that there would be multiple effects on receptors Smite Brook and Coombe Pool. The effects would be temporary and mitigation measures will be in place to reduce accidental spillage, leakage and contamination. It is not anticipated that these would result in a significant cumulative effect. Hydrological effects on ecological receptors are assessed in ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**). Effects are not considered to be significant except for those on Coombe Pool SSSI, in which it is expected that there would be a significant cumulative effect due to impacts relating to hydrology, air quality, noise, habitat loss and impacts related to the spread of INNS. Table 15.3 of ES Chapter 15 (Combined and Cumulative Effects) (**TR010066/APP/6.1**) outlines the potential single project residual effects between topics on receptors during operation of the Scheme. ES Chapter 8 (Biodiversity) (**TR010066/APP/6.1**) assesses potential hydrological impacts on ecological receptors during operation. Impacts are identified as changes to water quality (including pollution), and/ or quantity from runoff, due to proximity of the receptor to the Scheme and / or hydrological connection. Chapter 13 Road Drainage and the Water Environment details the drainage strategy proposed for the Scheme to attenuate new drainage systems to the greenfield runoff rate and existing modified drainage systems would see no increase in the existing runoff rate. Therefore, there would be no change in the level of impact of the scheme on ecological features from hydrological changes. A significant cumulative effect is not anticipated (identified as neutral) in ES Chapter 8 Biodiversity. Effects during operation on mutual receptors are anticipated to be neutral or slight adverse, and due to the nature and scale of the effects it is not anticipated that there would be significant cumulative effects.
5.259	The assessment should also identify protected areas and other water usages within the vicinity of any discharge, such as bathing waters, abstractions and fisheries at risk from proposed works and the permits/consents required. It should also identify opportunities, such as those included in the relevant local nature recovery strategy or catchment plan to improve water quality, for example, through nature-based approaches or solutions.	See the response to NPS NN paragraphs 5.253 and 5.258.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
Mitigation		
5.260	The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If an applicant needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water undertaker and the Environment Agency.	Use of water during construction is minimal and would be used for facilities at the satellite compound mostly and dust suppression and requirements will be managed at detailed design stage. This policy isn't relevant as the operation of the Scheme will not require any water use.
5.261	The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which are over and above any which may form part of the project application) are acceptable. A construction management plan may help codify mitigation.	The First Iteration EMP (**TR010066/APP/6.5**) sets out the control of processes, emissions and discharges through the construction process, including potential discharges to the water environment. First Iteration EMP (**TR010066/APP/6.5**) Appendix A, the REAC, includes the following commitments in relation to the water environment: G7, GS1, PH2, PH7, RD1 – DS13. Management plans included in the First Iteration EMP (**TR010066/APP/6.5**) are: First Iteration · EMP Appendix B.1 Outline Construction Air Quality and Dust Management Plan · EMP Appendix B.2 Outline Construction Noise and Vibration Management Plan · EMP Appendix B.3 Outline Site Waste Management Plan · EMP Appendix B.4 Outline Landscape and Ecology Management Plan · EMP Appendix B.5 Outline Construction Communication Strategy · EMP Appendix B.6 Unexpected archaeological finds protocol · EMP Appendix B.7 Historical building recording Written Scheme of Investigation · EMP Appendix B.8 Outline Carbon Management Plan The Second Iteration EMP will be produced which reflect the mitigation measures required by the REAC and set out in the ES and includes various management plans and method statements. This is secured by Requirement 4 of the draft DCO (**TR010066/APP/3.1**). In relating to water this includes a Water Monitoring and Management Plan. Other management plans to be included are:

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		· Site Waste Management Plan (SWMP) · Materials Management Plan (MMP) (if required) · Soil Handling Management Plan · Construction Noise and Dust Management Plan · Construction Air Quality and Vibration Management Plan · Construction Communication Strategy · Landscape and Ecology Management Plan (LEMP) · Biosecurity Management Plan · Water Monitoring and Management Plan · Detailed Heritage Written Scheme of Investigation (DHWSI) (Mitigation Strategy) · Invasive Non-Native Species (INNS) Management Plan · Operational UXO Emergency Response Plan (if required) The EMP (Third Iteration) as set out in Requirement 5 to the draft DCO (**TR010066/APP/3.1**) will set out measures to be adopted during the operational phase.
5.262	The project should adhere to any National Standards for Sustainable Drainage Systems. The Sustainable Drainage Systems Technical Standards introduced a hierarchical approach to drainage design that promotes the most sustainable approach but recognises feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints.	Design considerations, mitigation measures and residual risks are described in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), supported by detailed studies in ES Appendix 13.1 (Flood Risk Assessment) (**TR010066/APP/6.3**) and ES Appendix 13.2 WFD Compliance Assessment (**TR010066/APP/6.3**).
5.263	The project should identify opportunities and secure measures to protect and improve water quality and resources through green and blue infrastructure and sustainable drainage. This will help to achieve Environment Improvement Plan objectives and potentially provide greater capacity to support infrastructure needs.	As detailed in the ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), SuDS would be implemented as part of the temporary works drainage strategy during construction. The mitigation presented on ES Figure 2.4 (Environmental Masterplan) (**TR010066/APP/6.1**) has been designed holistically to include a number of benefits for the Scheme and the natural environment, this includes creation of habitat including scrub, grassland, woodland and three drainage basins two of which would be designed to be permanently wet and planted with aquatic species, representing nature-based solutions incorporated into the sustainable urban drainage (SUDs). This is also discussed in section 13.10 of ES Chapter 13

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		(Road drainage and the water environment (**TR010066/APP/6.1**) and set out in the drainage strategy (ES Appendix 13.6 (**TR010066/APP/6.3**)).
5.264	The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly. This may also include the need for treatment of water, which may need a permit under the Environmental Permitting Regulations.	The First Iteration EMP (**TR010066/APP/6.5**) sets out the control of processes, emissions and discharges through the construction process, including potential discharges to the water environment. At this point (i.e. the submission of the Application), the majority of consents and all of the powers required have been included, or addressed, within the draft DCO (**TR010066/APP/3.1**) as permitted by various provisions of the 2008 Act. The Consents and Agreements Position Statement (**TR010066/APP/3.3**) provides a full list of the consents, licences and permits that may be required as part of the Scheme, outside the powers of the DCO.
Decision-making		
5.266	The Secretary of State will generally need to give impacts on the water environment more weight where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive Regulations.	The WFD Compliance Assessment is presented in ES Appendix 13.2 (**TR010066/APP/6.3**). See the response to NPS NN paragraph 5.253. This WFD compliance assessment indicates any impacts are likely to be temporary and highly localised due to the construction approach along with the design and mitigation in place for the operational phase of the Scheme. Due to this, the Scheme is compliant with the objectives of the WFD, and it is concluded there is no significant risk to any WFD water bodies.
5.267	The Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Directive Regulations. The specific objectives for water bodies in particular river basins are set out in River Basin Management Plans. In terms of Water Framework Directive Regulations compliance, the overall aim of projects should be to meet the environmental objectives under regulation 13 or if appropriate meet the exemption test of overriding public interests by use of regulation 19 of the Water Framework Directive Regulations 2019. The Secretary of State should also consider the interactions of the proposed project with	ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**) supported by Figures **13.1 to 13.7** (**TR010066/APP/6.2**) has considered water bodies in a River Basin Management Plan. See the response to NPS NN paragraph 5.253. The WFD Compliance Assessment is presented in ES Appendix 13.2 (**TR010066/APP/6.3**). See the response to NPS NN paragraph 5.253. The Scheme does not interact within any area identified within Shoreline or Estuary Management Plans or Marine Plans.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	other plans such as Water Resources Management Plans, Shoreline or Estuary Management Plans and Marine Plans.	
5.268	The Secretary of State should consider whether appropriate requirements should be attached to any development consent and/or planning obligations to mitigate adverse effects on the water environment. This should involve discussions with the Environment Agency.	The Environment Agency has been consulted throughout the development of the Scheme. Further details can be found in ES Chapter 13 (Road Drainage and the Water Environment) (**TR010066/APP/6.1**), the Flood Risk Assessment (ES Appendix 13.1 (**TR010066/APP/6.3**)) and in the WFD Compliance Assessment (ES Appendix 13.2 (**TR010066/APP/6.3**)). The draft DCO (**TR010066/APP/3.1**) details the requirements to be discharged following the DCO being made. The First Iteration EMP (**TR010066/APP/6.5**) sets out the control of processes, emissions and discharges through the construction process. Detailed design is secured through Requirement 3 of the draft DCO (**TR010066/APP/3.1**): draft DCO Requirement 3 requires that "*the authorised development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the engineering drawings and sections unless otherwise agreed in writing by the Secretary of State…provided that the Secretary of State is satisfied that any amendments…would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement*". The First Iteration EMP (**TR010066/APP/6.5**) Appendix A REAC includes commitments to mitigate adverse effects on the water environment. The Second Iteration EMP is secured through Requirement 4 to the draft DCO (**TR010066/APP/3.1**). The Second Iteration EMP would include the following management plan related to mitigating impact on the water environment: Water Monitoring and Management Plan.
Impacts on transport networks		
Applicant's assessment		
5.271	Applicants should consult the relevant highway and transport authorities, local planning authority, and Network Rail, as appropriate, on the assessment of transport impacts. This should include having appropriate regard to policies outlined in existing or emerging local plans, Local	As part of the Scheme's development and the production of the ES (**TR010066/APP/6.1**) and the Transport Assessment (**TR010066/APP/7.3**) discussions have been held with Coventry City Council, Rugby Borough Council and Warwickshire County Council.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
	Transport Plans, Local Cycling and Walking Infrastructure Plans and Rights of Way Improvement Plans where appropriate and applicants should set out agreement on alignment of development proposals to these policies and plans.	A summary of local plan policies, Transport Plans and other strategies, and the impact of the Scheme, is included in ES Appendix 11.2: Legislation and Policy Framework (**TR010066/APP/6.3**), Section 6 of the Case for the Scheme (**TR010066/APP/7.1**) and the Transport Assessment (**TR010066/APP/7.3**).
5.272	Different transport networks may need to share space within an area, even whilst serving different travel needs. For example, bus lanes, shared cycle lanes, green lanes, or bus and rail routes on the same corridor.	There Scheme has considered WCH users and provision as part of its development, see response to NPS NN paragraph 4.59. The Transport Assessment (**TR010066/APP/7.3**) has considered public transport services that are located within the study area (500m from the Order Limits). The improvement to the A46 junction and the capacity at the junction will allow public transport to flow more freely on the surrounding local highway network. The Transport Assessment (**TR010066/APP/7.3**), states that traffic congestion increases travel time and reduces the appeal of buses as a convenient alternative to car use. Journey times are also mentioned to be a key driver of choice for some routes. The Scheme will reduce congestion on the A46 thus reducing journey times and therefore could encourage the appeal of public transport.
5.273	Applicants should seek to offer an integrated transport outcome, significantly considering opportunities to support other sustainable transport modes, as well as improving local connectivity and accessibility in developing infrastructure. The needs of pedestrian and other vulnerable road users should be considered, where appropriate, in line with the principles of the road user hierarchy.	The Transport Assessment (**TR010066/APP/7.3**), summarised in Section 4 of the Case for the Scheme (**TR010066/APP/7.1**), demonstrates that the Scheme will reduce the number of accidents (, although a small shift towards a higher severity is seen), and improve operational issues by upgrading the Walsgrave junction and providing safer access onto the A46 from new slip roads, and will be built to modern standards as set out in DMRB. The improvement of walking and cycling routes, as described in Section 4 of the Case for the Scheme (**TR010066/APP/7.1**) and ES Chapter 12 (Section 2.10 (**TR010066/APP/6.1)**), align to sustainable and integrated transport objectives. These new provisions introduce greener transport options locally. See the responses to NPS NN paragraphs 4.57 for further details with regards to active travel opportunities and WCH.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		The Scheme will provide a new signalised crossing on the B4082 and provide passive provision for potential new cycling and walking routes in the future. These aspects are set out in ES Chapter 12 (Population and Human Health) (**TR010066/APP/6.1**) this helps to promote sustainable modes of transport, by providing improved facilities for walkers and cyclists.
5.274	The applicant should provide evidence that as part of the project they have addressed any new or existing severance issues and/or safety concerns that act as a barrier to non-motorised users, unless it is unsafe or unviable to do so.	ES Chapter 12 Population and Human Health (**TR010066/APP/6.1**) describes the assessment of severance in terms of separation of communities from assets and areas of community land, alterations to private properties (including their access) and severance of walker, cyclist and horse-rider routes. The Scheme has been designed to manage the impacts of severance it may cause and relieve existing severance issues where possible. ES Chapter 12 (**TR010066/APP/6.1**) sets out where severance will occur, mitigation and the residual effects. The Scheme is predicted to reduce traffic flows on many local roads which reduces severance. With regards to non-motorised users, a signalised pedestrian crossing would be provided on the B4082 link road to the immediate east of the Clifford Bridge Road/B4082 roundabout. This would improve the north-south movement of pedestrians along the eastern side of Clifford Bridge Road between Wyken and Binley. This would become a Coventry City Council asset. The crossing also involves installing loops for the functioning of the crossing within the circulatory carriageway of Clifford Bridge Road roundabout. Associated with the crossing, pedestrian guard railing may also be installed around the south-eastern and north-eastern curves of the roundabout. This will assist in connecting the communities of Binley and Wyken and is an improvement over the existing uncontrolled crossing point on the B4082 and will provide safety benefits and reduce severance between the communities.
Road and rail developments		
5.275	For road and rail developments, the applicant's assessment should include an assessment of the transport impacts on other networks as part of the application, based on discussions with the Local Highway Authority/Local Transport Authority/Local Planning Authority.	The Transport Assessment (**TR010066/APP/7.3**) and Section 4 of the Case for Scheme (**TR010066/APP/7.1**) consider the transport effects of the Scheme on the strategic and local highway network with respect to traffic congestion, road safety and local sustainable modes of transport.

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
		As part of the Scheme's development and the production of the Transport Assessment discussions have been held with the local planning authorities (Coventry City Council and Rugby Borough Council) and the local highway authorities (Coventry City Council and Warwickshire County Council).
Mitigation		
5.281	Mitigation measures for schemes should be proportionate and reasonable, focussed on facilitating journeys by active travel, public transport, shared transport and cleaner fuels.	The Transport Assessment (**TR010066/APP/7.3**) details that the Scheme reduces congestion on the local network. Traffic congestion increases travel time and reduces the appeal of buses as a convenient alternative to car use. Journey times are also mentioned to be a key driver of choice for some routes. The Scheme will reduce congestion on the A46 thus reducing journey times and therefore could encourage the appeal of public transport. Reduced congestion also supports the economy by improving accessibility to jobs, allowing the movement of freight, supporting the delivery of new infrastructure and services. Also see the response to NPS NN paragraph 4.57 which details other mitigation measures for the scheme, including WCH and encouraging active travel.
5.282	Where development would worsen accessibility, there is a strong expectation that such impacts should be mitigated. Where impacts cannot be mitigated, the applicant is required to provide reasoning as to why impacts cannot be mitigated.	Section 4 of the Case for the Scheme (**TR010066/APP/7.3**) (which summarises the Transport Assessment (**TR010066/APP/7.3**)) sets out that against the accessibility indicator for the Social Impacts Assessment, road users are expected to have reduced and consistent journey times, concluding that there would be a neutral outcome.
5.283	The applicant should provide evidence that the development improves the operation of the network and assists with capacity issues.	The Transport Assessment (**TR010066/APP/7.3**) and Section 4 of the Case for Scheme (**TR010066/APP/7.1**) consider the operation of the network, and network capacity. The results of the modelling assessment in the Transport Assessment (**TR010066/APP/7.3**) show the scheme fulfils its objectives by providing capacity, relieving congestion, improving journey times and increasing accessibility for the local communities.
Road and rail developments		

NPS NN Paragraph Number	Requirement of the NPS NN	Compliance with the NPS NN
5.284	Mitigation measures may relate to the design, lay-out or operation of the scheme, or any support or funding to the immediate surrounding area of the scheme.	Mitigation measures for the Scheme are embedded in the Scheme and detailed through the documents included in this application including the Scheme Design Report (**TR010066/APP/7.4**), ES Chapters 5-15 (**TR010066/APP/6.1**) and the First Iteration EMP (**TR010066/APP/6.5**).
Decision-making		
5.289	Infrastructure development should recognise the importance of providing adequate lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. For strategic rail freight interchanges, facilities should serve those drivers using the site.	Due to the nature of the Scheme involving the upgrade of the junction, mostly within the existing highway boundary, to provide relief from traffic congestion and to improve journey times, lorry parking facilities have not been included. As set out in ES Chapter 2 (The Scheme) (**TR010066/APP/6.1**). The two existing public laybys on the A46 would be removed. Due to the distance between the existing M6/M69 junction and the new proposed Walsgrave Junction there is not a sufficient length to allow a public layby to be incorporated safely. The Scheme includes the construction of a maintenance layby (see Work No 1I on Sheet 4 of the Works Plans (**TR010066/APP/2.3**). There is adequate capacity within the local area and surrounding SRN.

Glossary of Terms

Term	Acronym	Meaning
The 2008 Act		The Planning Act 2008.
Affected Road Network	ARN	Parts of the road network which are identified as likely to be affected by changes in air quality as a result of a project. These comprise all roads that trigger the traffic screening criteria and adjoining roads within 200m.
Agricultural Land Classification	ALC	The system devised and introduced by the Ministry of Agriculture, Fisheries and Food to classify agricultural land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. Land is graded between 1 (excellent quality) to 5 (very poor quality), with grade 3 subdivided into agricultural subgrades 3a and 3b.
Air quality objective		Objectives are policy targets generally expressed as a maximum ambient pollutant concentration to be achieved. The objectives are set out in the UK Government's Air Quality Strategy for the key air pollutants.
Air Quality Monitoring Area	AQMA	Defined geographical areas where air pollution levels are, or likely to, exceed national air quality objectives.
Ancient woodland		Any area that has been continually wooded since at least 1600 AD and has developed irreplaceable, complex ecosystems.
Ante Meridiem	AM	Before midday
The Applicant		National Highways.
Area of Detailed Modelling	AoDM	The area within which significant changes in flow and speed due to the Scheme may be expected to occur. The AoDM has been specified as detailed, simulation, network.
Arboricultural Impact Assessment	AIA	A document submitted as part of the application for development consent that details existing tree constraints and trees/areas of arboricultural significance using available tree survey data with the information used to help minimise and/or avoid impacts on trees.
At-grade		On the same level. For example, when a road is on the current ground level.
Base year		The outputs of the traffic model coinciding with the year the traffic data was collected.
Benefit to Cost Ratio	BCR	The benefit cost ratio is a presentation of the amount of benefit being bought for every £1 of cost to the public purse – the higher the BCR the greater the benefit for every £1 spent.
Best and most versatile land	BMV	Land defined as grades 1, 2 and 3a of the Agricultural Land Classification. This land is considered the most flexible, productive and efficient and is most capable of delivering crops for food and non-food uses.
Biodiversity		The variability among living organisms from all sources, including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part of. This includes diversity within species, between species and of ecosystems.
Biodiversity Net Gain	BNG	An approach that aims to leave biodiversity within the natural environment in a measurably better state than its condition prior to implementation of a project.
Bund		An embankment that acts as a visual or noise screen, or acts as a barrier to control the spillage of fluids.
Bypass		The diversion of a major road to carry traffic around a built-up area, constructed to improve the journey of through traffic and/or improve the environmental conditions along the original route.
Case for the Scheme	Case for the Scheme	This document.
Climate		Long-term weather conditions prevailing over a region.
Climate change		This refers to a change in the state of the climate, which can be

Term	Acronym	Meaning
		identified by changes in average climate characteristics which persist for an extended period, typically decades or longer.
Congestion		A situation where the volume of traffic is too great for the road, causing vehicles to slow down or stop, often caused by bottlenecks, traffic incidents and junction design.
Conservation area		An area designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest and with a character or appearance that is desirable to preserve or enhance.
Consultation Report		The Report which sets out how the Applicant has complied with the consultation requirements of the Planning Act 2008 and how the Applicant has had regard to the responses received.
Cost and Benefit to Accidents – Light Touch	COBA-LT	COBALT software undertakes the analysis of the impact on accidents as part of the economic appraisal for a road scheme, in accordance with the Department for Transport's Transport Analysis Guidance.
Coventry Strategic Transport Model	CoSTM	The Coventry Strategic Transport Model is a comprehensive tool used by Coventry City Council to plan and manage the city's transport system. It helps in understanding current travel patterns, forecasting future travel demand, and evaluating the impact of various transport policies and infrastructure projects.
Cultural heritage		Historic monuments, historic groups of buildings and/or historic sites.
Culvert		A tunnel (pipe or box shaped) that carries a stream or open drain under a road or railway.
Department for Transport	DfT	The national Government body responsible for transport in Britain, and therefore in overall control of the road network. It is responsible for policy decisions, and its responsibilities are carried out by a range of agencies and local authorities.
Department for Transport's Transport Analysis Framework	TAG	A framework for options appraisal used by National Highways.
Development Consent Order	DCO	The consent for a Nationally Significant Infrastructure Project required under the Planning Act 2008.
Design Manual for Roads and Bridges	DMRB	The Design Manual for Roads and Bridges contains information about current standards relating to the design, assessment and operation of motorway and all-purpose trunk roads in England.
Desk-Based Assessment	DBA	A document prepared to provide a detailed assessment of the cultural heritage resource and sensitivities within the Order Limits of the Scheme and explores the potential effects the Scheme may have upon this resource.
Development plan		Documentation which that seeks to guide development and planning in a local authority area for a set period.
Do Minimum	DM	The conditions that would persist in the absence of the implementation of a construction or improvement project but on the basis that maintenance on the road network is ongoing.
Do Something	DS	The conditions that would occur as a consequence the implementation of a construction or improvement project.
Dust		All airborne particulate matter.
Earthworks		The removal or placement of soils and rocks such as in cuttings, embankments and environmental mitigation, including the in-situ improvement of soils/rocks to achieve the desired properties.
Embedded mitigation		Design measures that are integrated into the Scheme for the purpose of minimising environmental effects.
Environment Agency	EA	Government agency established to protect and improve the environment and contribute to sustainable development in England. Responsibilities include: water quality and resources, flooding and coastal risk management and contaminated land.
Environmental Management	EMP	A site specific plan developed to ensure that a project is implemented in an environmentally sustainable manner where all contractors and

Term	Acronym	Meaning
Plan		subcontractors, including consultants, understand the environmental constraints within the site.
Environmental Assessment Report	EAR	A process by which information about environmental effects is collected, assessed, and used to inform decision-making.
Environmental Impact Assessment	EIA	The statutory process through which the likely significant effects of a development project on the environment are identified and assessed.
Environmental Statement	ES	A statutory document which reports the EIA process, produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.
Essential Mitigation		Mitigation required to offset the impacts as a result of construction and operation of the Scheme, which is secured through a Development Consent Order.
First Iteration Environmental Management Plan		The First Iteration of the Environmental Management Plan produced to set out mitigation measures and other commitments. This document **(TR010066/APP/6.5)** is submitted with the Development Consent application.
Flood Risk		A combination of the probability (likelihood or chance) of a flood event happening, and the consequences (impact) if it occurred.
Flood Risk Assessment	FRA	The process of assessing potential flood risk to a site and identifying whether there are any flooding or surface water management issues that may warrant further consideration or may affect the feasibility of the Scheme.
Flood Zone 1		Land outside the floodplain where there is little or no risk of flooding.
Flood Zone 2		The area of the floodplain where there is a low to medium flood risk.
Flood Zone 3		The area of the floodplain where there is a high risk of flooding.
Floodplain		Land adjacent to a watercourse over which water flows or would flow in times of flood, but for defenses in place.
Fluvial		A term that relates to rivers and streams and the processes that occur within them.
Fully Modelled Area	FMA	Outside of the AoDM, the Fully Modelled Area extends beyond the AoDM and consists of simulation network coding with somewhat larger zones and slightly less network detail.
Geology		The physical structure, substance and history of the earth (rocks and minerals).
Grade separated		A type of junction where the major route (or routes) through the junction do not stop and do not cross any other road on the level. Movements to other roads are made using slip roads and bridges.
Great Crested Newt	GCN	A newt in the family Salamandridae, found across Europe and parts of Asia, which are protected under the Conservation of Habitats and Species Regulations 2017.
Green Belt		A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped.
Greenhouse gases	GHG	Atmospheric gases that absorb and emit infrared radiation emitted by the Earth's surface, the atmosphere and clouds.
Green infrastructure		Green infrastructure is a network of multi-functional green and blue features and other natural features, urban and rural, which are capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. Green Infrastructure can include nature-based solutions to prevent or reduce environmental impacts. Green infrastructure can also enable developments to provide positive environmental, social and economic benefits. The Green Infrastructure Framework – Principles and Standards for England can be used to consider green infrastructure in development and plan for good quality and targeted creation or improvement.
Ground investigation	GI	An intrusive investigation undertaken to collect information relating to the ground conditions, normally for geotechnical or land contamination purposes.

Term	Acronym	Meaning
Groundwater		Water found underground in porous geological strata and soils.
ha	Hectares	Measurement of area of land parcel. 10,000 square metres.
Habitat		The place or type of site where an organism or population naturally occurs. Often used in the wider sense referring to major assemblages of plants and animals found together.
Habitats Regulations Assessment	HRA	An assessment of *'projects'* (or plans) potentially affecting European Sites in the UK, required under the Habitats Directive and Regulations. Also known as an assessment of implications on European Sites.
Heritage Asset		A building, monument, site, place, area or landscape of historic value.
Historic England		Executive non-departmental public body created under section 32 of the National Heritage Act 1983 to: a. secure the preservation of ancient monuments and historic buildings situated in England; b. promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation.
Historic Environment Record	HER	A record of all known archaeological finds and features and historic buildings and historic/landscape features, relating to all periods from the earliest human activity to the present day; maintained by each County and Unitary Authority in the United Kingdom.
Identification	ID	Process or action of identifying someone or something.
Junction		A place where two roads meet, regardless of design or layout.
Journey Time Reliability	JTR	Journey Time Reliability refers to the consistency and predictability of travel times on a given route. It measures how much travel times vary from day to day or at different times of the day. High journey time reliability means that travel times are consistent and predictable, while low reliability indicates frequent and significant variations in travel times.
Kilometres	KM	A metric unit length equal to 1,000 metres.
Land Use		What land is used for, based on broad categories of functional land cover, such as urban and industrial use and the different types of agriculture and forestry.
Landscape		An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.
Landscape and Ecology Management Plan	LEMP	Is a site-specific document, which details immediate and long-term commitments to manage the planting, protection and enhancement of biodiversity in and around a new development site.
Landscape Character Area	LCA	Areas of landscape that have a broadly consistent pattern of topography, land use and vegetation cover.
Landscape and Visual Impact Assessment	LVIA	A tool used to identify and assess the significance of and the effects of change resulting from a development on both the landscape as a resource and on people's views and visual amenity.
Limits of Deviation	LoD	The maximum lateral and vertical extents within which the Scheme can be built. These are defined in the Development Consent Order.
Listed building		A building of special architectural or historic interest. Listed buildings are graded I, II* or II, with Grade I being as the highest. Listing includes the interior, as well as the exterior, of the building.
Local Nature Reserve	LNR	A statutory designation for certain nature reserves in Great Britain. It is a protected area designated by local authorities due to its special natural interest, educational value, or community importance.
Local Development Framework	LDF	Documentation which that seeks to guide development and planning in a local authority area for a set period.
Local Enterprise Partnership	LEP	Partnerships between local authorities and businesses. They decide what the priorities should be for investment in roads, buildings and facilities in the area

Term	Acronym	Meaning
Local Planning Authority	LPA	The body empowered by law to exercise planning functions.
Local Wildlife Site	LWS	Non-statutory sites of nature conservation value that have been designated 'locally'. These sites are referred to differently between counties with common terms including site of importance for nature conservation, county wildlife site, site of biological importance, site of local importance and sites of metropolitan importance.
Metres	m	A metre is the base unit of length in the International System of Units (SI). First introduced as a unit of length in the metric system (equivalent to approximately 39.37 inches).
Miles per hour	Mph	Imperial system unit of speed expressive the number of miles travelled in one hour.
Midlands Regional Transport Model	MRTM	The modelling for the Scheme is based on this model. MRTM2 is one of five Regional Transport Models used to assess programme level strategies across regions and provide a starting point for the development of detailed proposed scheme specific models, where networks, volumetric counts and availability of travel demand data can reduce the trafficking modelling programme
Mineral safeguarding area	MSA	Areas defined by mineral planning authorities with known mineral resources that are of identified economic or conservation value.
Mitigation		Measures intended to avoid, reduce and, where possible, remedy significant adverse environmental effects as the result of the Scheme.
Monitoring		An assessment of the performance of the Scheme, including mitigation measures. This determines if effects occur as predicted or if operations remain within acceptable limits, and if mitigation measures are as effective as predicted.
Motorway		A special type of road reserved for motorised traffic only, the numbers of which are prefixed with the letter 'M'.
National Character Area	NCA	A natural subdivision of England based on a combination of landscape, biodiversity, geodiversity and economic activity. The 159 NCAs in the UK follow natural, rather than administrative boundaries.
National Nature Reserve	NNR	National Nature Reserve is statutory designation, it is a protected area designated for its significant natural features, including habitats, species, and geological formations.
Nationally Significant Infrastructure Project	NSIP	Nationally Significant Infrastructure Project, further defined within Chapter 1 of this Case for the Scheme.
National Planning Policy Framework	NPPF	A planning framework which sets out the Government's planning policies for England and how these are expected to be applied.
National Policy Statements	NPS	Statements prepared and designated by the Secretary of State under the Planning Act 2008, which establish national policy for Nationally Significant Infrastructure Projects, including energy, transport and water, waste water and waste and against which applications for Development Consent Orders are assessed.
National Networks National Policy Statement	NPS NN	A statement setting out the need for, and the Government's policies to deliver, the development of Nationally Significant Infrastructure Projects on the national road and rail networks in England.
Natural England	NE	Executive non-departmental public body constituted under the Natural Environment and Rural Communities Act 2006 (section 2(1)) to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.
Nitrogen Dioxide	NO_2	Nitrogen Dioxide is a reddish-brown gas that is highly reactive and toxic. Nitrogen dioxide is a chemical compound with the formula NO_2. Nitrogen Dioxide is primarily known as an air pollutant rather than a greenhouse gas. However, it plays a significant role in atmospheric chemistry, contributing to the formation of ground-level ozone and

Term	Acronym	Meaning
		particulate matter, both of which are harmful pollutant.
Noise		Unwanted sound.
Noise barrier		Fence placed between a road and a noise sensitive receptor to reduce noise levels. Includes all elements of the fence (posts and fixings, as well as panels).
Noise Important Area	NIA	Areas identified with respect to noise from major roads and from roads within agglomerations where 'the 1% of the population that are affected by the highest noise levels from major roads' are located according to the results of the strategic noise mapping.
Operational		The functioning of the Scheme on completion of construction.
Order Limits		The extent of the area within which the Scheme may be carried out.
Outline Site Waste Management Plan	OSWMP	Identifies the strategic approach for the management of waste generated during the construction phase of the Scheme.
Post Meridiem	PM	After midday.
Preferred Option		The chosen design option that most successfully achieves the Scheme objectives and becomes subject to further design and assessment
Preferred Route Announcement	PRA	An announcement made by National Highways following the selection of a preferred option or solution for a road scheme.
Present Value	PV	Present Value is a financial concept that represents the current value of a future sum of money or stream of cash flows, discounted at a specific rate of return.
Present Value Benefit	PVB	Present Value Benefit refers to the current worth of future benefits, discounted at a specific rate to account for the time value of money. This concept is often used in cost-benefit analysis to evaluate the economic feasibility of projects or investments.
Principal Contractor		A person or organisation responsible for the overall management of a construction project, particularly when there is more than one contractor involved in a project.
Protected Species		Species of wild plants, birds and animals that are afforded protection through legislative provisions.
Public right of way	PRoW	A highway where the public has the right to pass. It can be a footpath (used for walking), a bridleway (used for walking, riding a horse and cycling), or a byway that is open to all traffic (including motor vehicles).
Register of Environmental Actions and Commitments	REAC	The Register of Environmental Actions and Commitments (REAC) is contained in Appendix A of the First Iteration Environmental Management Plan (EMP) (**TR010066/APP/6.5**) and identifies the environmental commitments included within the ES (**TR010066/APP/6.1**) to address the potential environmental effects of the Scheme. As part of this, specific actions and control measures which individual ES Chapters relied upon as part of their assessments have been defined and presented in the REAC. These measures must be implemented and complied with in full.
Remediation (contaminated land)		The process of removing a pollution linkage (i.e. by removing one or more of the elements in a source - pathway – receptor linkage) in contaminated land in order to render an acceptable risk. Usually this involves a degree of removal of contaminants and/ or blockage of pathways.
Road Investment Strategy	RIS	A document which sets a long-term strategic vision for the network. With that vision in mind, it then: specifies the performance standards Highways England must meet; lists planned enhancement schemes we expect to be built; and states the funding that we will make available during the first Road Period (RP), covering the financial years 2015/16 to 2019/20.
Road Investment Strategy 2	RIS2	A document which sets a long-term strategic vision for the network. With that vision in mind, it then: specifies the performance standards Highways England must meet; lists planned enhancement schemes

Term	Acronym	Meaning
		we expect to be built; and states the funding that we will make available during the second Road Period (RP2), covering the financial years 2020/21 to 2024/25.
Roads Period 1	RP1	Roads Period 1 (RP1) refers to the first phase of the UK government's Road Investment Strategy (RIS), which covered the period from April 2015 to March 2020.
Road Period 2	RP2	Roads Period 2, also known as the Road Investment Strategy 2 (RIS2), covers the period from April 2020 to March 2025.
Road Safety Audit 1	RSA1	There are four stages of a Road Safety Audit (RSA). Stage 1 RSAs are undertaken at the completion of preliminary design and normally before planning consent is granted.
Roundabout		A circular, one-way junction at which other roads meet and terminate.
Runoff		The flow of water over the ground surface.
Scoping		The process of identifying the issues to be addressed by the Environmental Impact Assessment process. It is a method of ensuring that an assessment focuses on the important issues and avoids those that are considered insignificant.
Scoping Opinion		The written opinion of the relevant authority, following a request from the Applicant, as to the information to be provided in an Environmental Statement.
Scoping Report		A report that records the outcomes of the scoping process and is typically submitted as part of a formal request for a Scoping Opinion.
Screening		The formal process undertaken to determine whether it is necessary to carry out a statutory Environmental Impact Assessment and publish an Environmental Statement in accordance with the EIA Regulations.
Second Iteration Environmental Management Plan		The second iteration of the Environmental Management Plan, which is refined for the construction stage of the consented project and prepared in advance of construction.
Severance (walkers, cyclists and horse riders)		The extent to which members of communities are able (or not able) to move around their community and access services/facilities.
Significance (of effect)		A measure of the importance or gravity of the environmental effect, defined by generic significance criteria or criteria specific to an environmental topic.
Simulation and Assignment of Traffic to Urban Road Networks	SATURN	SATURN is a powerful and flexible highway assignment software package.
The Scheme		The A46 Coventry Junctions (Walsgrave) Scheme for which development consent is being sought.
Significant Observed Adverse Effect Level	SOAEL	The level above which significant adverse effects on health and quality of life occur.
Site of Special Scientific Interest	SSSI	Area of land notified by Natural England under section 28 of the Wildlife and Countryside Act 1981 as being of special interest due to its flora, fauna or geological or physiological features.
Site Waste Management Plan	SWMP	A plan that is used to outline how a construction project would avoid, minimise or mitigate effects on waste production and handling on the environment and surrounding area.
Soil		An assemblage of mineral particles and/or organic matter, which includes variable amounts of water and air (and sometimes other gases).
Soils Management Plan	SMP	A document that provides a framework that can be used by contractors to manage and monitor the soils disturbed during the construction phase of the Scheme.
Supplementary Planning Document	SPD	Supplementary Planning Documents are additional guidance on some of the policies of the Local Plan. They provide detailed guidance on how planning policy will be implemented. SPDs do not have the same status as the policies in the Local Plan but have been subject to public

Term	Acronym	Meaning
		consultation and are taken into account as material considerations in dealing with planning applications
Special Area of Conservation	SAC	Sites designated under EU legislation for the protection of habitats and species considered to be of European interest.
Stakeholder		An organisation or individual with a particular interest in the Scheme.
Strategic Road Network	SRN	The network of motorways and trunk roads in England.
Supplementary Planning Document	SPD	Documents not part of a development plan for a particular authority area that provide additional guidance or detail on policies within the development plan and are a material consideration for an LPA in their decision-making.
Sustainable Drainage System	SuDS	Techniques for managing water runoff to reduce the quantity, and increase the quality, of surface water that drains from a development.
Targeted consultation		Following the statutory consultation, the Applicant undertook targeted non-statutory consultation as a result of updates to the proposal in six areas of the Scheme. This targeted non-statutory consultation was held to seek views and allow an opportunity for prescribed consultees, persons with land interests and community stakeholders, who the Applicant considered would be impacted by, and interested in, the Scheme, to comment on the updates.
Tonnes of carbon dioxide equivalent	tCO2e	A measure that allows the different greenhouse gases to be compared on a like-for-like basis relative to one unit of CO2.
Transport Analysis Guidance	TAG	Guidance produced by the Department for Transport for undertaking transportation studies, appraisals and modelling. Also referred to as WebTAG.
Transport Decarbonisation Plan	TDP	A plan that sets out the government's commitments and the actions needed to decarbonise the entire transport system in the UK.
Traffic Management Plan	TMP	A document that sets out how construction traffic including site personnel movements will be controlled to ensure the safe and efficient delivery of the Scheme.
Veteran Tree		Trees that have features of ancientness but at a younger age. These features include missing branches, hollow trunks and habitat features more commonly associated with ancient trees.
Visual Receptor		Individuals and/or defined groups of people who potentially could be affected by the Scheme.
Walkers, cyclists and horse-riders	WCH	A collective term used to describe pedestrians, cyclists and equestrians.
Water Framework Directive	WFD	A European Union Directive which commits member states to achieve good status of all waterbodies (both surface and groundwater), and also requires that no such waterbodies experience deterioration in status. Good status is a function of good ecological and good chemical status, defined by a number of elements.
Wider Economic Impacts	WEIs	Wider Economic Impacts