Our ref: TR010066

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25 April 2025

Dear Mr Humphrey,

A46 COVENTRY JUNCTIONS (WALSGRAVE) – TR010066
APPLICANT'S RESPONSE TO RULE 9 LETTER - PROCEDURAL DECISION TO REQUEST FURTHER INFORMATION FROM NATIONAL HIGHWAYS

In respect of the Application for the A46 Coventry Junctions (Walsgrave) Scheme (the "Application"), this letter responds to the Examining Authority's (ExA) letter dated 20 March 2025, Rule 9 - Procedural Decision to request further information from National Highways (**PD-005**) in regard to:

- "Interim Planning Guidance on the consideration of the Environment Act PM2.5 targets in planning decisions" - published 4 October 2024
- "National assessment of flood and coastal erosion risk in England 2024" Environment Agency, updated 22 January 2025. The letter also responds to the Environment Agency updates to using National Flood Risk Assessment (NaFRA) data from March 2025.

The information requested is provided in **Appendix A (Air Quality)** and **Appendix B (Road Drainage and the Water Environment (Flood Risk))** of this letter. Please do not hesitate to make contact should you need clarification on any of the matters detailed within this letter.

Yours sincerely,

[redacted]

[redacted]

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Appendix A. Air quality

1. Introduction

1.1.1. As part of the application by National Highways (NH) (the "Applicant") for an Order Granting Development Consent for the A46 Coventry Junctions (Walsgrave) Project (herein known as the "Scheme"), an Environmental Impact Assessment (EIA) was undertaken. This included an air quality assessment and is outlined within Environmental Statement (ES) Chapter 5 (Air Quality)[1] (**APP-027**) with associated appendices (**APP-063, APP-064** and **APP-065**) and ES Figures (**APP-045**, **APP-046** and **APP-047**).

1.1.2. The Planning Inspectorate (the "Inspectorate") has requested additional information regarding the Scheme application under Planning Act 2008 – Section 89 and the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 9. The Examining Authority (ExA) published a letter on 20 March 2025[2] (**PD-005**) to outline the Procedural Decision to request further information. With relation to air quality the following was quoted within the Rule 9 letter (**PD-005**):

> ***"Interim Planning Guidance on the consideration of the Environment Act $PM_{2.5}$ targets in planning decisions" - published 4 October 2024***
>
> *The Department for Environment Food and Rural Affairs have published the above that explains that this guidance should be taken into account in the design process and documented within the planning application documents. By way of example, it states that evidence of its application could be set out within the air quality assessment in the environmental statement.*
>
> *The ExA note that in Table 5.1 of the air quality chapter of the environmental statement [APP-027] reference is made to new $PM_{2.5}$ targets but states that at the time of writing these had not been published. As these new targets are now available the ExA would like to understand their implications for the submitted assessment."*

1.1.3. This technical note outlines the Applicant's direct response to this request for further information.

[1] National Highways (November 2024) A46 Coventry Junctions (Walsgrave) Scheme Number: TR010066 6.1 Environmental Statement, Chapter 5 Air Quality. https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR010066-000125-6.1%20Environmental%20Statement%20-%20Chapter%205%20Air%20Quality.pdf

[2] Planning Inspectorate (20th March 2025) Planning Act 2008 - Rule 9 Letter Rule 17 letter - ExA request for further information

2. Existing Air Quality Chapter Context

2.1.1. The following information has been gathered from ES Chapter 5 (Air Quality) (**APP-027**) to provide context for the Rule 9 letter and how $PM_{2.5}$ has been assessed.

2.2. Legislation

2.2.1. As noted within the Rule 9 letter, within Table 5-1 of ES Chapter 5 (Air Quality) (**APP-027**), reference is made to the new $PM_{2.5}$ targets from the Air Quality Strategy (AQS) for England 2023 (replaces 2007 AQS (Defra, 2007))[3] as well as the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023[4].

Table 5-1 states:

"The 2023 AQS reinforces the AQOs [Air Quality Objectives] *and limit values in addition to including new $PM_{2.5}$ targets. The new $PM_{2.5}$ targets include a long-term annual mean concentration target and an average population exposure reduction target, both to be achieved by 2040. The relevant AQOs, limit values, and targets considered in this assessment are presented in Table 5-4. The AQS states that whilst the new $PM_{2.5}$ targets have been set, the Department for Levelling Up, Housing and Communities is leading wider planning reforms that will detail how other statutory bodies should implement these targets with respect to decision-making. At the time of writing, these reforms are yet to be published."*

2.2.2. As stated in Table 5-6 of ES Chapter 5 (Air Quality) (**APP-027**), under the AQS for England 2023, the current annual mean objective for $PM_{2.5}$ is 20µg/m^3 with no allowed exceedances. By 2040, the annual mean target concentration reduces to 10µg/m^3 as per the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.

2.3. Methodology

2.3.1. Within this ES Chapter 5 (Air Quality) (**APP-027**), an air quality assessment for the operational phase was carried out in line with DMRB LA 105 guidance[5] and

[3] Department for Environment, Food and Rural Affairs (Defra). Air Quality Strategy: Framework for Local Authority Delivery (2023)

[4] His Majesty's Government (UK). (2023). Statutory Instruments 2023. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (legislation.gov.uk)

[5] Highways England (2019) Design Manual for Roads and Bridges (DMRB). DMRB LA 105 – Air Quality. [Online]. Available from: 10191621-07df-44a3-892e-c1d5c7a28d90 (standardsforhighways.co.uk).

the Scoping Statement (ES Appendix 4.1 (Scoping Opinion Response) (**APP-061**)) as agreed with local authorities and relevant bodies.

2.3.2. Paragraphs 5.5.21 to 5.5.23 of ES Chapter 5 (Air Quality) (**APP-027**), outline the approach to $PM_{2.5}$ modelling:

"5.5.21. Furthermore, DMRB LA 105 states that there is no need to model $PM_{2.5}$ as the UK currently meets its legal requirements for the achievement of the $PM_{2.5}$ air quality annual mean limit value (20 µg/m^3). Whilst the government has set two new legally binding targets to reduce concentrations of $PM_{2.5}$, 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.

5.5.22. The closest Defra's Automatic Urban and Rural Network (AURN) monitoring sites to the Scheme already meet the 2040 $PM_{2.5}$ annual mean concentration target (Defra, 2024). The nearest AURN site that exceeds the target (10 µg/m^3) 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.

5.5.23. Therefore, the air quality assessment has adhered to DMRB LA 105 and $PM_{2.5}$ has not been assessed further."

2.3.3. $PM_{2.5}$ has not been assessed further within the assessment because the baseline $PM_{2.5}$ concentrations are significantly below the annual mean limit value (20 µg/m^3) (as stated in Paragraph 5.5.22 of ES Chapter 5 (Air Quality) (**APP-027**)). Therefore, there is negligible risk of exceedance, and it is not necessary for $PM_{2.5}$ to be separately assessed.

2.3.4. In line with DMRB LA 105 guidance, the PM_{10} concentrations in the ES Chapter 5 (Air Quality) (**APP-027**) assessment were only reported for the base year (2018) concentrations (as stated in Paragraph 5.5.20):

"5.5.20 As per DMRB LA 105 guidance, where the model results of the base year scenario indicate that there are no exceedances of the PM_{10} annual mean objective, then no further assessment of PM_{10} in the Do-Minimum and Do-Something scenarios will be undertaken."

2.3.5. As reported in paragraph 5.9.14 of ES Chapter 5 (Air Quality) (**APP-027**), "*the maximum* [predicted] *concentration was 19.2µg/m^3 at R69, R70 and R72"* in 2018. These concentrations are below the relevant annual mean PM_{10} air quality threshold of 40µg/m³. As a worst case, if all the modelled PM_{10} concentrations were assumed to be in fact $PM_{2.5}$, the modelled concentrations

would still be below the relevant annual mean air quality threshold for $PM_{2.5}$ of 20µg/m³.

2.3.6. It should be noted that, although in paragraph 5.5.21 that DMRB LA 105 states that there is no need to model $PM_{2.5}$, it is known that National Highways are planning on updating their guidance to including methodology regarding $PM_{2.5}$ in future.

2.4. Rule 9 – additional data requirements

2.4.1. As stated in paragraph 1.1.2 above, in its Rule 9 letter, the ExA noted that, *"reference is made to new $PM_{2.5}$ targets but states that at the time of writing these had not been published."* The Applicant takes this opportunity to clarify that, as stated within the extract from Table 5-1 and paragraph 5.5.21 of ES Chapter 5 (Air Quality) (APP-027), the targets had been published and were considered within the assessment. However, the new interim $PM_{2.5}$ guidance[6] had not been published and therefore not considered within the assessment. The Rule 9 document (**PD-005**) requests how this Interim Planning Guidance impacts the consideration of the Environment Act $PM_{2.5}$ targets in planning decisions. This information is provided in the below Sections.

[6] Department for Environment, Food and Rural Affairs (Defra). $PM_{2.5}$ Targets: Interim Planning Guidance. PM_{2.5} Targets: Interim Planning Guidance - DEFRA UK Air - GOV.UK

3. Interim Planning Guidance

3.1. Purpose of Guidance

3.1.1. The $PM_{2.5}$ Targets: Interim Planning Guidance[7] was created by DEFRA to provide guidance to strategies and recommendations to help local authorities and developers incorporate $PM_{2.5}$ reduction measures into their planning processes due to the introduction of the 10µg/m^3 $PM_{2.5}$ annual mean concentration as per the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. In addition, there is a population exposure reduction target of 35% compared to 2018, both to be achieved by 2040.

3.1.2. *"The purpose of the targets is to improve air quality by reducing levels of $PM_{2.5}$ across the country, therefore improving public health."* The Guidance encourages local authorities and developers to prioritize strategies that mitigate fine particulate matter emissions.

3.1.3. It should be noted that the interim guidance is to act as placeholder while the full guidance is currently being developed by DEFRA at the time of writing (April 2025). The full guidance should provide more information and expand on the information that has been provided within the interim guidance.

3.2. Assessment of compliance

3.2.1. Relevant monitoring sites will be used to assess the achievement of the $PM_{2.5}$ target, however the targets apply to ambient (outdoor) air throughout England. Therefore, regardless of whether a monitor is present, the impact of development on air quality should be considered by Applicants and Local Planning Authorities.

3.2.2. This is a different response to existing air quality legislation and requires Applicants and Local Authorities to use a different approach. This "*new approach moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage".*

3.3. Key questions introduced by the guidance

3.3.1. The guidance provides prompt questions which are designed to help the support the interim process. Measures in addition to those outlined within the guidance can also be considered. The prompt questions are set out below:

[7] Department for Environment, Food and Rural Affairs (Defra). $PM_{2.5}$ Targets: Interim Planning Guidance. PM_{2.5} Targets: Interim Planning Guidance - DEFRA UK Air - GOV.UK

1. How has exposure to $PM_{2.5}$ been considered when selecting the development site?

Applicants are advised to consider the following in their application:

- *Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,*
- *Site proximity to pollution sources and the impact of these on users of the development,*
- *Exposure and emissions during both construction and in-use.*

2. What actions and/or mitigations have been considered to reduce $PM_{2.5}$ exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of $PM_{2.5}$ and its precursors?

Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:

- *Site layout,*
- *The development's design,*
- *Technology used in the construction or installed for use in the development,*
- *Construction and future use of the development.*

4. Baseline Concentrations – additional information

4.1.1. As mentioned within Section 2.3 of this technical note, a separate assessment of $PM_{2.5}$ was not considered necessary within the ES Chapter 5 (Air Quality) (**APP-027**) as DMRB LA 105 does not require it and nearby monitoring data suggested that baseline $PM_{2.5}$ concentrations are significantly below the annual mean limit value (20 µg/m^3) and below the 2040 annual mean target (10 µg/m^3). This information was provided in the Methodology section of the ES Chapter 5 (Air Quality) (**APP-027**) (paragraph 5.5.22).

4.1.2. For the purposes of the Rule 9 letter (**PD-005**), this section provides a more detailed review of background concentrations of $PM_{2.5}$ concentrations in the Scheme's study area with particular reference to the Interim Planning Guidance.

4.2. Local Authority Monitoring

Monitoring within Coventry City Council local authority

4.2.1. Coventry City Council *"does not currently generate any reliable $PM_{2.5}$ or PM_{10} data"*[8] however as stated within ES Chapter 5 (Air Quality) (**APP-027**), DEFRA undertakes monitoring within the local authority area as part of the Automatic Rural and Urban Network (AURN).

4.2.2. As seen in Table 1, the $PM_{2.5}$ annual mean concentrations have remained well below the air quality objective (20µg/m^3) over the period reviewed. It should also be noted that both monitoring sites have recorded annual mean $PM_{2.5}$ concentrations well below the 2040 10µg/m^3 target already, including at the nearby roadside site.

4.2.3. It should be noted that although Coventry Allesley is outside of the study area included in the air quality assessment, this measured data is still representative of the study area and can be used in lieu of any nearer monitoring.

[8] Coventry City Council (2023) 2022 & 2023 Air Quality Annual Status Report (ASR) asr-coventry-2022-2023

Table 1: $PM_{2.5}$ monitoring concentrations inside Coventry City Council's local authority (Including extracted data from Table 5-15 of Chapter 5 - Air Quality)

Site name	Site type	X	Y	Distance to Scheme (km)	Pollutant	Annual mean concentration (µg/m³)						
						2018	2019	2020[1]	2021[1]	2022	2023	2024
Coventry Binley Road	Urban Traffic	434785	278978	3.5	$PM_{2.5}$[2]	-	-	-	-	-	-	8.1
Coventry Allesley	Urban Background	430013	279383	8.3	$PM_{2.5}$	-	9.1	7.3	7.4	7.4	6.9	6.6

[1] Annual concentrations affected by COVID-19 pandemic travel restrictions

[2] It should be noted that $PM_{2.5}$ monitoring did not commence at Coventry Binley Road site until 2024.

Monitoring within Rugby Borough Council (RBC)

4.2.4. Since the publication of ES Chapter 5 (Air Quality) (**APP-027**), RBC have since published their 2024 Air Quality Annual Status Report (ASR)[9]. Within this ASR, it states that RBC have ceased $PM_{2.5}$ monitoring within the local authority since December 2017 as there were no monitored exceedances of either annual mean or short term AQS objectives or targets after several years.

4.3. DEFRA Backgrounds

4.3.1. DEFRA provides mapped future year projections of background pollution concentrations for $PM_{2.5}$ for each 1km x 1km grid square across the UK for all years between 2021 and 2040[10]. The maps include a breakdown of background concentrations by emission source, including road and industrial sources, which have been calibrated against UK monitoring data from 2021.

4.3.2. There have been previous iterations of DEFRA background maps, such as the 2018 background maps which have been calibrated against UK monitoring data from 2018[11]. The 2018 background map has been used to source 2018 background data.

4.3.3. The range in background concentrations reported for the grid squares encompassing the study area for the study base year (2018), current year (2025), future opening year (2028) and every 5 years until 2040 (2030, 2035 and 2040) are summarised in Table 2. It should be noted that no sector removal has been carried out on these concentrations.

[9] Rugby Borough Council (2024) 2024 Air Quality Annual Status Report (ASR) b25fc513-e8b1-c0aa-35e6-7103f490e372

[10] Department for Environmental Food and Rural Affairs. Background Mapping data for local authorities – 2021 Background Mapping data for local authorities - 2021 - DEFRA UK Air - GOV.UK

[11] Department for Environmental Food and Rural Affairs. Background Mapping data for local authorities – 2018 Background Mapping data for local authorities - 2018 - DEFRA UK Air - GOV.UK

Table 2: Range in background annual mean $PM_{2.5}$ concentrations for every 5 years from current year (2025) until 2040 in addition to 2018 (study base year) and 2028 (opening year) applicable to the assessed study area

Year	Source	Annual mean concentration (µg/m³)
		$PM_{2.5}$
2018	Defra background maps (2018-base); without sector removal	8.9 – 10.4
2025	Defra background maps (2021-base); without sector removal	6.5 – 7.3
2028		6.3 – 7.1
2030		6.1 – 7.0
2035		5.9 – 6.7
2040		5.7 – 6.5

4.3.4. The reported background annual mean concentrations are well within the relevant objectives for $PM_{2.5}$. The $PM_{2.5}$ background annual mean concentrations are also well below the 2040 10µg/m³ target in all years (including the current year, 2025).

4.3.5. As seen within Table 2, background concentrations are predicted to decline annually with incremental improvements in particulate matter concentrations. This is principally due to the increased proportion of zero exhaust emission vehicles in the national fleet and the introduction of more stringent vehicle emissions standards that apply to NOx and particulates.

4.4. National Highways Monitoring Network

4.4.1. National Highways also has a network of over 60 particulate monitors along the National Highways road network. These particulate monitors measure both PM_{10} and $PM_{2.5}$ concentrations. In 2023, there were no measured annual mean $PM_{2.5}$ concentrations greater than the target of 10µg/m³ at any of these monitoring stations[12].

[12] Arcadis (2024) National Highways Air Quality Monitoring Network: Annual 2023 Network Report. National+Highways+NAQMN+Annual+2023+Report_V4.pdf

4.5. Implications of Interim Planning Guidance

4.5.1. Under the Interim Planning guidance, relevant monitoring sites will be used to assess the achievement of the $PM_{2.5}$ target. As seen by the monitoring data in Table 1, the DEFRA background concentrations in Table 2, and the National Highways Monitoring Network data, it is highly likely that the 2040 target will be met as the monitored concentrations are already compliant.

4.5.2. In addition to the maximum annual mean concentration target of 10µg/m^3, there is a population exposure reduction target of 35% compared to 2018 to be achieved by 2040. As seen within the background maps (Table 2), there is expected to be a greater than 36% reduction between 2018 and 2040 for background concentrations which aligns with this target. Furthermore, the urban background monitoring at Coventry Allesley (Table 1) shows that there is a 27% reduction in concentrations between 2019 and 2024. As this reduction has occurred in only 5 years, it is likely that the additional 8% reduction should be able to be achieved within the remaining 15 years before 2040.

5. Construction Phase

5.1.1. The interim planning guidance makes reference to the impacts of the construction of a development on $PM_{2.5}$ concentrations.

5.1.2. Within ES Chapter 5 (Air Quality) (**APP-027**), it states in paragraph 5.9.48 that with "*the application of best practice construction mitigation measures, as defined in the First Iteration EMP* (Environment Management Plan) *(**APP-109**), there will be **no likely significant air quality effect** on local air quality associated with construction dust."*

5.1.3. With these mitigation measures from the First Iteration EMP (**APP-109**) in place, this will reduce the impact of dust and therefore will not affect $PM_{2.5}$ concentrations.

6. Operational Phase

6.1.1. Although the interim guidance outlines some ideas to help support the new targets, this has currently not been adopted by DMRB and therefore there is no quantitative methodology.

6.1.2. The guidance does however explicitly say that the Scheme can be assessed qualitatively. One of the actions that can be considered to reduce $PM_{2.5}$ exposure and emissions for development users and nearby receptors is the design of a Scheme. The following aspects have already been embedded into the Scheme's road upgrade design (as outlined in the Introduction to the Application (**APP-003**)[13], paragraph 2.1.7) which will help with air quality emissions:

- *Realignment of the existing A46 dual carriageway through the existing at grade roundabout (which will be removed), for approximately 880m to improve the road geometry and allow for a 50mph speed limit.*
- *Improvements to facilities for walkers, cyclists and horse-riders (WCH) through provision of a signalised pedestrian crossing on the B4082; and providing enabling works, including the retention of Hungerley Hall Farm accommodation overbridge, for a potential future WCH route to be provided by others.*

6.1.3. By removing the existing roundabout, this will reduce congestion and make traffic more free-flowing as well as reducing brake-wear emissions from hard breaking along the high speed roads (A46 and the B4082) on the approach to the previous Walsgrave roundabout. This will reduce emissions of $PM_{2.5}$.

6.1.4. The reduced speeds on the A46 (50mph speed limit) should also contribute to the reduction in emissions of $PM_{2.5}$, despite the increase in traffic through increased traffic capacity.

6.1.5. It should also be noted that the Scheme itself is an update to an existing road and will provide no new emission sources. The Scheme and A46 is also within a semi-rural area and outside of major population areas. This means that there would be no increase in exposure.

6.1.6. Therefore, even though $PM_{2.5}$ has not been explicitly modelled, it can be concluded that all impacts from the Proposed Scheme are considered negligible and not significant.

[13] National Highways (2024) App-003 A46 Coventry Junctions (Walsgrave) Scheme number:TR010066, 1.3 Introduction to the Application Microsoft Word - 1.3 Introduction to the Application

7. Conclusions

7.1.1. This technical note investigated the implications of the new $PM_{2.5}$ interim planning guidance that has been published after the completion of the ES, as per the Rule 9 request for information.

7.1.2. The information provided in this note is supplementary to the existing air quality assessment (outlined in ES Chapter 5 (Air Quality) (**APP-027**)). The Chapter references the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 and confirms that existing local monitoring of $PM_{2.5}$ has reported compliance with both the current national limit value (20µg/m^3) and the 2040 concentration target (10µg/m^3). Therefore, with reference to DMRB LA 105, further assessment of $PM_{2.5}$ was not required as the UK currently meets its legal requirements.

7.1.3. Whilst the Chapter has assessed $PM_{2.5}$ in line with the requirements of DMRB LA 105, it is acknowledged that LA 105 has not yet been updated to account for the new targets and associated interim planning guidance. Therefore, this technical note has addressed the implications of the new interim planning guidance.

7.1.4. Under the Interim Planning guidance, relevant monitoring sites would be used to assess the achievement of the $PM_{2.5}$ target. Baseline concentrations of $PM_{2.5}$ have been investigated in the wider area surrounding the Scheme from both local authorities (Coventry City Council and Rugby Borough Council) and DEFRA (AURN and background maps). All local monitoring data and modelled background concentrations have been confirmed to be well below the 10µg/m^3 $PM_{2.5}$ annual mean concentration 2040 target. Modelled DEFRA background concentrations are also predicted to reduce by over 35% between 2018 and 2040.

7.1.5. The interim planning guidance makes reference to the impacts of the construction of a development on $PM_{2.5}$ concentrations. As stated in ES Chapter 5 (Air Quality) (**APP-027**), the First Iteration EMP (**APP-109**) contains best practice construction mitigation measures. With these measures in place, this will reduce the impact of dust and therefore will not materially affect $PM_{2.5}$ concentrations.

7.1.6. The interim planning guidance only provides information on how to qualitatively assess developments. Based on embedded design measures including the removal of the Walsgrave roundabout reducing congestion and breakwear, it is likely that $PM_{2.5}$ emissions would be reduced despite the increase in traffic through increased capacity. As the Scheme is also a road upgrade in a semi-rural area, there will be no new emission sources within major population sources as well as no increases in exposure. Therefore, even though $PM_{2.5}$ has

not been explicitly modelled, it can be concluded that all impacts from the Proposed Scheme on $PM_{2.5}$ are considered negligible and not significant.

7.1.7. Based on the above investigations and baseline monitoring, if the interim planning guidance had been in place at the time of the original Scheme air quality assessment, there would be no material changes to the assessment outcomes. Therefore, the conclusions of the EIA assessment remain the same.

Appendix B. Road drainage and the water environment

7.1.8. This Appendix has been prepared by the Applicant to set out its responses to the Examining Authority's (ExA) Procedural Decision to request further information (Section 89) – letter dated 20 March 2025 (**PD-005**).

7.1.9. ExA Rule 9 – Procedural Decision to request further information – letter dated 20 March 2025 (**PD-005**) states the following:

"National assessment of flood and coastal erosion risk in England 2024" Environment Agency, updated 22 January 2025.

The Environment Agency has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024" and will be publishing additional datasets to further support this later this month. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's Data Services Platform. The ExA would like to understand the Applicant's views as to the implications of the new data on the submitted flood risk assessment. [APP-101]."

7.1.10. This section has been prepared to supplement the Flood Risk Assessment (FRA) (ES Appendix 13.1) (**AS-012**) to assess the changes to the Environment Agency Flood Map for Planning[14] and Long-Term Flood Risk[15] datasets as requested by the ExA. This includes the updates to the Flood Map for Planning published on 25th March and the updated risk of flooding from surface water data published on the 28 January 2025. These datasets have been updated in line with the findings of the National Flood Risk Assessment 2 (NaFRA)[16]. This section aims to compare and summarise updates in both fluvial and pluvial flood data for the A46 Coventry Junctions (Walsgrave) Scheme, hereby referred to as the 'Scheme'.

[14] Environment Agency, 2025. Flood Map for Planning. Available at: https://flood-map-for-planning.service.gov.uk/ Accessed: April 2025

[15] Environment Agency, 2025. Surface water map. Available at: https://check-long-term-flood-risk.service.gov.uk/map?easting=438416&northing=279515&map=SurfaceWater Accessed: April 2025

[16] https://www.gov.uk/guidance/updates-to-national-flood-and-coastal-erosion-risk-information

7.2. Fluvial

7.2.1. The A46 Walsgrave ES Appendix 13.1 (FRA) (**AS-012**) utilised the Environment Agency Flood Map for Planning for the initial assessment of fluvial flood risk. This is based upon the national / strategic scale modelling undertaken by the Environment Agency. This mapping showed the majority of the Scheme Order Limits falls within Flood Zone 1 (Figure 8-2 of ES Appendix 13.1 (FRA) (**AS-012**)). There are areas of the Scheme that fall within Flood Zones 2 and 3:

- The Smite Brook flows in a culvert under the A46 south of Walsgrave Junction, with land on either side of the A46 located in Flood Zones 2 and 3.
- The Smite Brook then flows in a culvert under the B4082 and excess flow spills onto the B4082 which is located within Flood Zone 2.
- Flood Zone 2 extends along Brinklow Road (B4428) which passes beneath the A46, 600m south of the existing Walsgrave Junction.

7.2.2. However, since the submission of the ES Appendix 13.1 (FRA) (**AS-012**) as part of the DCO application, the Environment Agency has updated the Flood Map for Planning. The updated Flood Map for Planning shows a slight reduction in fluvial flood extents south of the B4082 and along the B4082 road (Figure 8-1). However, the updated maps also show an enhanced representation of the Coombe Pool dam (i.e. east of the A46) and the associated flood risk. This results in a differentiation of flood extents associated with Birchley Beck, the watercourse which flows northerly between the dam and the A46, causing marginal changes to the flooding within the reservoir and increased flood extents south of Brinklow Road.

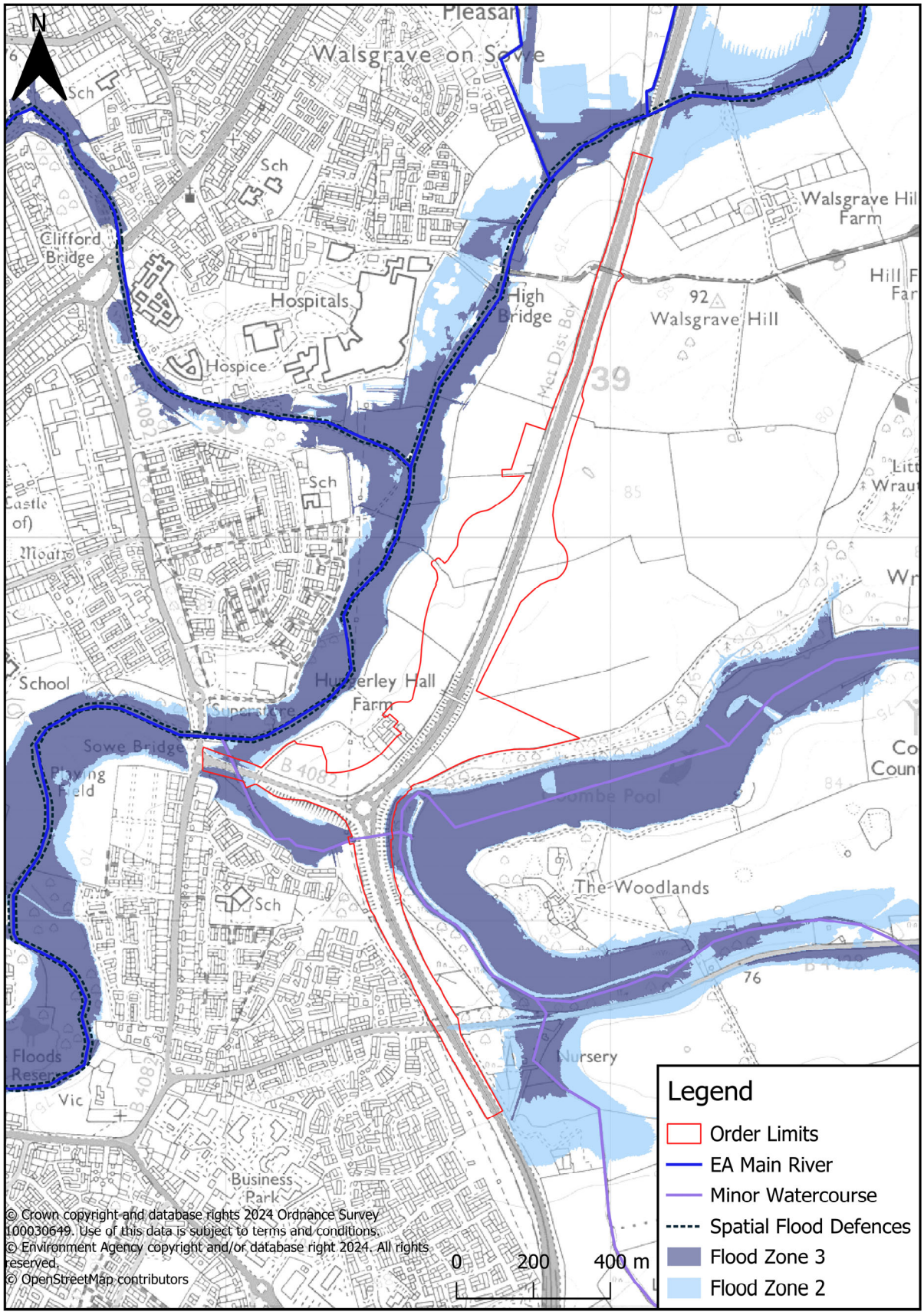

Figure 8-1: Updated Flood Map for Planning

7.2.3. However, the main assessment of fluvial flood risk within ES Appendix 13.1 (FRA) (**AS-012**) was based upon site specific hydraulic modelling. This site specific modelling was used to quantify fluvial flood risk to the Scheme (Section 8.3.3 of ES Appendix 13.1 (FRA) (**AS-012**)). The hydraulic modelling predicted the Scheme does not result in changes in fluvial flood risk, other than to some very limited areas of fluctuation due to a proposed slacker slope along the A46 southbound embankment.

7.2.4. The site specific hydraulic modelling offers a more accurate representation of fluvial flood risk to and from the Scheme than the Environment Agency Flood Map for Planning. This is due to the Environment Agency Flood Map for Planning providing a nation-wide assessment whereas, site-specific modelling considers more detailed characteristics specific to the Scheme. Therefore, the hydraulic modelling within ES Appendix 13.1 (FRA) (**AS-012**) is considered to be the most accurate assessment of fluvial flood risk. This modelling has been reviewed and accepted by Environment Agency, detailed in Annex C of ES Appendix 13.1 (FRA) (**AS-012**).

7.2.5. Therefore, the updates to the Flood Map for Planning do not result in any changes to the findings of ES Appendix 13.1 (FRA) (**AS-012**).

7.3. Pluvial

7.3.1. ES Appendix 13.1 (FRA) (**AS-012**) utilised the Environment Agency's Risk of Flooding from Surface Water map as shown on their Long-term Flood Risk Map to assess pluvial flood risk. The mapping indicated that the Order Limits lie in areas of very low, low, and high surface water flood risk. High flood risk areas were noted to be along the existing A46 carriageway and B4027 (Figure 8-12 of ES Appendix 13.1 (FRA) (**AS-012**)). There was also an identified high risk of pluvial flooding to the south of the Walsgrave Junction where Smite Brook is culverted beneath the A46.

7.3.2. The updates to the Environment Agency's Risk of Flooding from Surface Water map as shown on their Long-term Flood Risk Map has resulted in significant reductions in surface water flood extents across the study area, including south of the B4082 (Figure 8-2). Surface water flood risk is still present along the A46 and Walsgrave Junction with an increase in pluvial flood extent on the highway to the immediate east of the Walsgrave Junction.

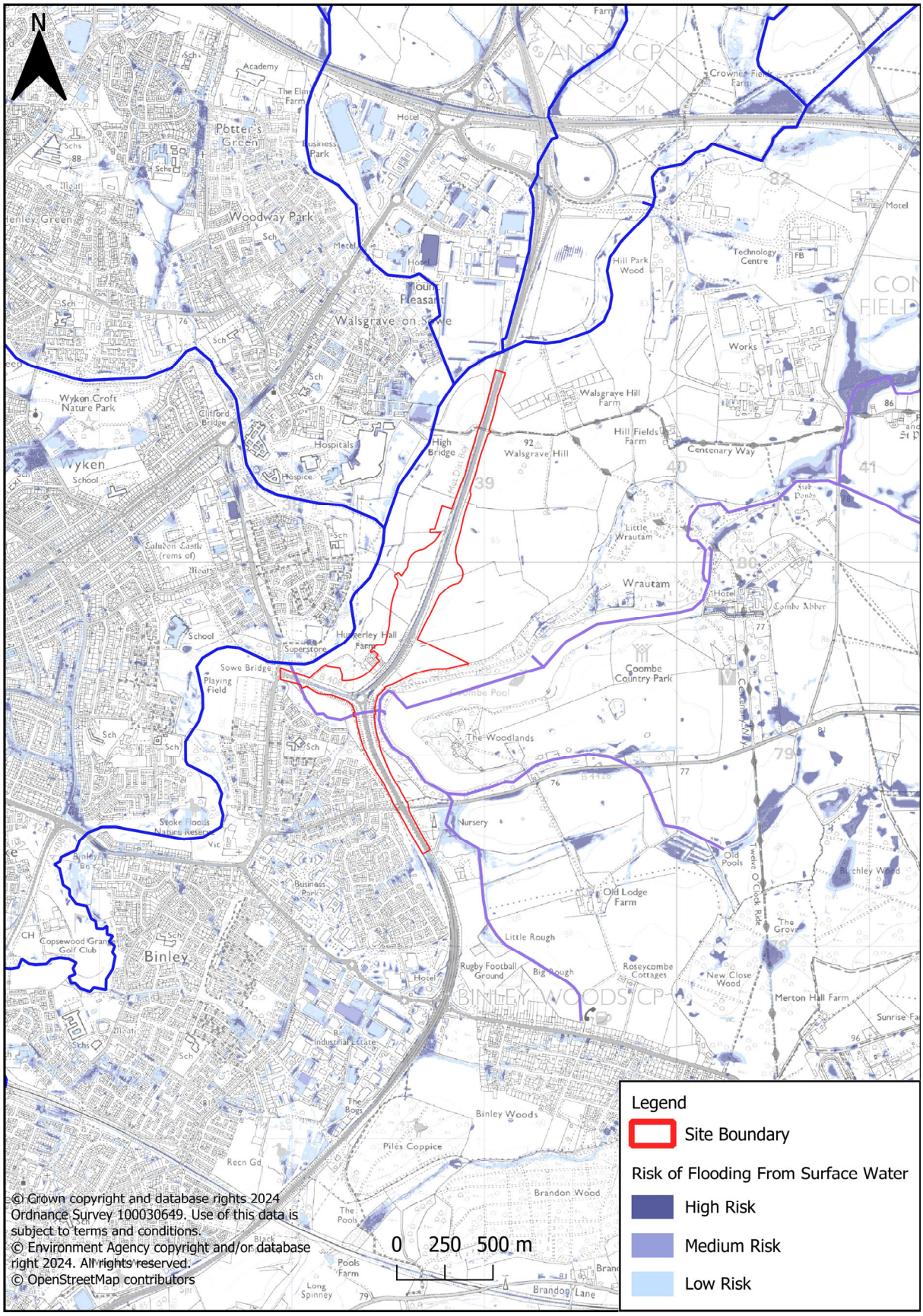

Figure 8-2: Updated Surface Water flood risk map

7.3.3. The updated Environment Agency Long-term Flood Risk Map also assesses a climate change scenario. This predicts the yearly chance of pluvial flooding between 2040 and 2060. This mapping shows increased pluvial flood extents in the same areas of pluvial flooding during the present-day mapping (Figure 8-3) and along the highway (which will be mitigated by the proposed surface water drainage strategy detailed in ES Appendix 13.6 (Drainage Strategy Report) (**APP-106**)). The new climate change mapping does not indicate that the Scheme is at significant increased risk of pluvial flooding and the assessment in the ES therefore remains accurate.

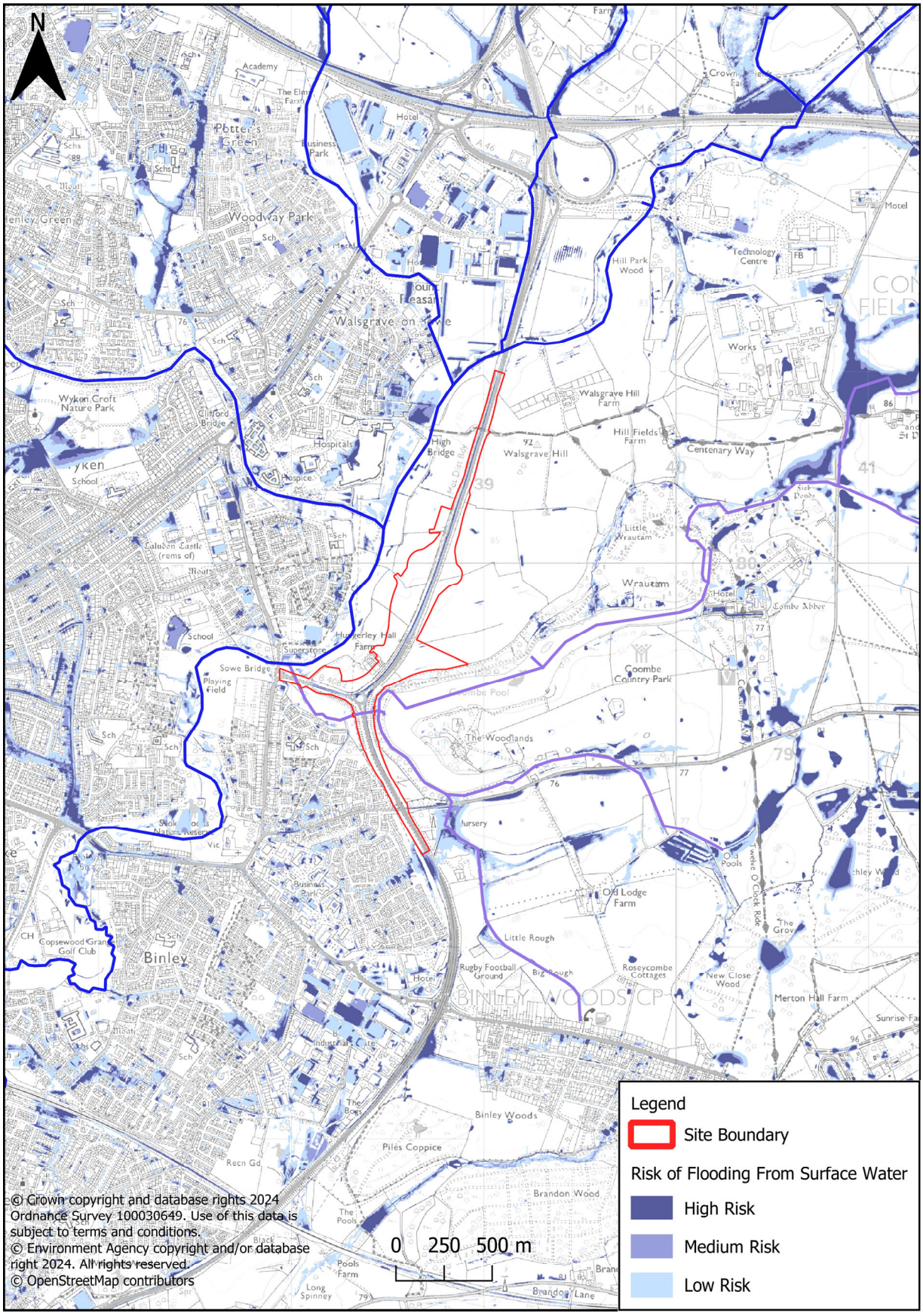

Figure 8-3: Surface water flood risk with climate change considered

7.3.4. The updated mapping largely shows significant reductions in pluvial flood risk across the Scheme apart from on the highway east of the existing Walsgrave Junction. Therefore, the assessment of pluvial flood risk within ES Appendix 13.1 (FRA) (**AS-012**) can be considered as an assessment of the worst-case present-day scenario due to the updated mapping showing a reduction in pluvial flood extents. The updated climate change mapping indicates that the Scheme is not at significant increased risk of pluvial flooding.

8. Summary of flood risk

8.1.1. It is considered that the findings of ES Appendix 13.1 (FRA) (**AS-012**) remain valid and no change to the assessment is required. A summary of the changes in flood extents is provided in Table 8-1.

Table 8-1 Summary of Flood Risk Changes

Source of flood risk	Summary
Fluvial flood risk	The updates to the Flood Map for Planning shows a slight reduction in fluvial flood extents south of the B4082 and along the B4082 road and increased flood extents east of the A46, especially south of the B4428. However, site specific hydraulic modelling from the A46 Walsgrave FRA (ES Appendix 13. (**AS-012**)) offers a more accurate representation of fluvial flood risk to and from the Scheme than the Environment Agency Flood Map for Planning.
Pluvial flood risk	The updates to the long term flood risk map shows reductions in pluvial flood risk across the Scheme apart from east of the existing Walsgrave Junction. The updated mapping also provides a climate change scenario which indicates that the Scheme is not at significant increased risk of pluvial flooding.
Groundwater flood risk	No change to ES Appendix 13.1 (FRA) (**AS-012**).
Reservoir flood risk	No change to ES Appendix 13.1 (FRA) (**AS-012**).
Flood risk from sewers	No change to ES Appendix 13.1 (FRA) (**AS-012**).
Historical flooding	No change to ES Appendix 13.1 (FRA) (**AS-012**).