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Planning Inspectorate:

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**Our ref:** XA/2025/100357/01-L01

**Your ref:** TR010066-000003

**Date:** 27 May 2025

Dear Sir/Madam

**A46 Coventry Junction (Walsgrave) – Development Consent Order Application**

**Examination: Issue Specific Hearing 1 Action**

We have reviewed the Issue Specific Hearing 1 Action Points (dated 8 May 2025) and our comments are provided in the table appended to this letter.

Yours faithfully,

**Mr Munashe Mavunga**

**Planning Advisor – National Infrastructure Team**

E-mail: NITeam@environment-agency.gov.uk

| No | ACTION  | RESPONSE   |
|----|---|--|
| 10 | Why does the Environment Agency consider it necessary for there to be a requirement in the draft DCO in relation to providing 10% Biodiversity Net Gain (BNG)?              | It is positive that the applicant aims to deliver a minimum of 10% BNG and has voluntarily incorporated BNG into their designs. However, we request that the applicant considers the inclusion of a minimum of 10% BNG within the draft DCO to ensure that BNG measures are delivered and maintained, as delivery of BNG is considered best practice.  |
|    | What is the Environment Agency's position on the Applicant's proposals to protect and enhance watercourses and the development of new habitats in proposed detention basin? | <p>The Environment Agency (EA) approves of the proposed measures outlined in Figure 2.4, to plant scrub, hedgerows and woodland around the new detention basin, to improve connectivity between the waterbody and the surrounding landscape. We also approve of the native seed and plug mixes chosen to enhance the basin (LE6.4, page 12) and to enhance the riparian edges of the watercourses (LE6.2, page 12). However, we would also recommend adding rushes (e.g. <i>Juncus</i> sp.) to the species lists.</p> <p>In addition, further enhancements measures could be considered to make the detention basin and watercourses more attractive to wildlife by providing habitat variety if possible and practicable.</p> |
|    | Can the Environment Agency provide examples for the suitable and practicable enhancement for the watercourses and detention basin?  | <p>As a regulator, it would be inappropriate for us to outline exactly how the applicant should enhance any habitat on the site; however, we can provide the following examples:</p> <ul style="list-style-type: none"> <li>• The base could be designed with gently sloping earthworks that mimic naturalistic edges, which provide a variety of water depths. Planting will depend on how often the detention basin is expected to be wet throughout the year.</li> <li>• Temporarily wet areas such as at the top of slopes could be sown with wet-grassland species mixes.</li> <li>• Marshy/waterlogged areas such as near the outlet could be planted with emergent aquatic species.</li> </ul>                          |

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|    |  | <ul style="list-style-type: none"> <li>• Flatter areas like the base could be planted with marginal aquatic species.</li> <li>• All species should mimic plant communities found within local wetland and marshy habitats. Planting would make the basin more appealing to species such as amphibians, invertebrates, birds and bats.</li> </ul> <p>Enhancement options for watercourses include the removal of physical modifications/artificial banks, the management of invasive non-native species and the retrofitting of mammal ledges to bridges/culverts.</p> |
|    | The Environment Agency has used an issue impact solution framework to explain its views on the effects of unnatural lighting on Coombe Pool Site of Special Scientific Interest. Can the Environment Agency provide an explanation of these effects? | The EA intended to point out that the applicant could include lighting as an indirect impact within Section 8.8.104 (Chapter 8) for completeness. However, we acknowledge that the applicant has included sufficient commitments to reduce the impact of light disturbance during construction.   |
|    | Can the Environment Agency explain the green engineering solutions available as suitable alternatives to harm and scour protection?  | Our comments on green engineering were made for the applicant to consider alternatives to hard engineering, if possible and practicable.<br>Green/soft engineering alternatives such as live willow spilling, coir matting, fascines, etc are recognised as a more environmentally friendly solution to traditional methods (such as concrete, sheet piling, rip-rap, etc.), and can also act as a watercourse enhancement on heavily modified/artificial waterbodies.  |
| 14 | The Environment Agency is to set a date by which it would report back on whether they would release their reservoir flood maps to the applicant. The agency have not released this   | Through discussions with the consultant, SWECO, we are now aware that the Flood Risk and Drainage Manager from Coventry County Council has requested the reservoir flood maps which we are working to provide.  |

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|  | to date due to national security considerations. |  |
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