

A46 Coventry Junctions (Walsgrave) Scheme Number: TR010066

8.16 Applicant's Comments on Submissions Received at Deadline 1

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 17(1)

Planning Act 2008

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Deadline 2

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Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules 2010**

A46 Coventry Junctions (Walsgrave)
Development Consent Order 202[x]

**APPLICANT'S COMMENTS ON SUBMISSIONS
RECEIVED AT DEADLINE 1**

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CONTENTS

1.	Introduction.....	4
1.1.	Purpose of this document	4
2.	List of Submissions	5
3.	Applicant's responses to the Deadline 1 submissions.....	6

1. Introduction

1.1. Purpose of this document

- 1.1.1. The Development Consent Order (DCO) application for the A46 Coventry Junctions (Walsgrave) Scheme (the “Scheme”) was submitted by National Highways (the “Applicant”) to the Secretary of State for Transport via the Planning Inspectorate on 14 November 2024 and accepted for Examination on 12 December 2024.
- 1.1.2. This document has been prepared by the Applicant to set out its Comments on submissions received at Deadline 1 issued on 29 May 2025. This document is submitted at Deadline 2 of the Examination.

2. List of Submissions

Ref No.	Representation By:	Submission:
REP1-037	Coventry City Council	Coventry City Council's - Issue Specific Hearing – Action Points
REP1-038	Coventry City Council	Annex A to Issue Specific Hearing 1 - Indicative Cycle route
REP1-033	Environment Agency	Issue Specific Hearing - Action Points

3. Applicant's responses to the Deadline 1 submissions

Ref no.	Representation recorded comments	Applicant's Response
REP1-037 - Coventry City Council's - Issue Specific Hearing Action Points		
AP1	No.1 - Plan of indicative route of cycle route The attached plan shows the indicative route from Binley Cycleway to Coombe via the accommodation bridge.	The Coventry City Council Walking Cycling and Horse Riding (WCH) scheme plan shows a continuous connection from the Binley Cycleway on Clifford Bridge Road to Coombe Abbey Park. The proposals include a path on the northern frontage of the B4082 with a controlled crossing leading to the retained Hungerley Hall Farm accommodation bridge. The proposed indicative WCH route, submitted by Coventry City Council, broadly aligns with what has been previously discussed with the Applicant; and is considered to be compatible with the enabling works the Applicant has sought to integrate within the preliminary design of the Scheme.
AP9	No. 9 - Planned works at Coombe Pool The Council have had confirmation from an officer of Coombe Park that the maintenance work planned to the earthwork retaining structure will be completed by Autumn 2025. This is not annual works and therefore will not interfere with the A46 embankment works planned for 2026/27.	No response required.
AP11	No.11 – Maintenance of woodland area Parks and Open Spaces Team will be responsible for the maintenance of the woodland area. Internal discussions are ongoing at the Council on whether the land in question will be part of the Parks public open space asset, or incorporated within the Coombe Country Park.	No response required.
REP1-038 - Coventry City Council - Annex A to Issue Specific Hearing 1 - Indicative Cycle route		
X	Indicative cycle route plan provided	See response to REP1-037 - AP1 above.
REP1-033 - Environment Agency - A46 Coventry Junction (Walsgrave) – Development Consent Order Application Examination: Issue Specific Hearing 1 Action		
AP10 bullet 1	Action - 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)?	The Applicant does not consider that a requirement to deliver 10% BNG is necessary; it is not a legal requirement (and will not be until at least May 2026 for Nationally Significant Infrastructure Projects (NSIPs), given the delayed introduction date announced on 28 May

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	<p>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.</p>	<p>2025; even then it is not expected to apply to projects that have already been accepted for examination).</p> <p>Paragraphs 4.26 and 5.47 of the National Policy Statement for National Networks (2024) (NPS NN) only requires the delivery of BNG in line with any Biodiversity Gain Statement but this will not be published in the near future, and may only apply once BNG is mandatory.</p> <p>Nevertheless, the Applicant is confident that its proposals for environmental mitigation will achieve net gain in biodiversity as demonstrated in Environmental Statement (ES) Appendix 8.1 (Biodiversity Net Gain Report) (APP-076) and the Applicant will look to maximise this gain through the design.</p>
AP10 bullet 2	<p><i>Action - 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?</i></p> <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>	<p>The Applicant will consider the Environment Agency's recommendation to include rushes (e.g., <i>Juncus</i> sp.) in the species lists LE6.2 and LE6.4. This will be done in collaboration with the Scheme ecologists and drainage experts to determine their practicable inclusion. Additionally, the Applicant will explore further enhancements to the detention basin and watercourses during the detailed design stage, continuing to work closely with the Environment Agency to assess what is feasible and practical.</p>
AP10 bullet 3	<p><i>Action - Can the Environment Agency provide examples for the suitable and practicable enhancement for the watercourses and detention basin?</i></p> <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"> - 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. 	<p>The Applicant welcomes the examples provided by the Environment Agency and will continue to work collaboratively with the Environment Agency to explore what is possible and practicable throughout the detailed design stage of the Scheme.</p>

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	<ul style="list-style-type: none"> - Temporarily wet areas such as at the top of slopes could be sown with wet-grassland species mixes. - Marshy/waterlogged areas such as near the outlet could be planted with emergent aquatic species. - Flatter areas like the base could be planted with marginal aquatic species. - 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. - 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. 	
AP10 bullet 4	<p><i>Action - 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?</i></p> <p>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.</p>	<p>ES Chapter 8 (Biodiversity) (APP-030) has been updated and will be resubmitted at Deadline 3 to include an assessment of lighting impacts on fish and on Coombe Pool Site of Special Scientific Interest (SSSI). The assessment of lighting impacts on Coombe Pool identifies a slight adverse (not significant) effect on the SSSI due to impacts during construction on the woodland bird assemblage. The effect of construction lighting on birds using the pool is assessed as neutral (not significant). No impacts to the SSSI from operational lighting are anticipated.</p> <p>The assessment of construction lighting impacts on fish concludes a slight adverse (not significant) effect. A neutral effect (not significant) has been concluded with regards to operational lighting impacts on fish, due to the absence of such impacts upon Coombe Pool, Smite Brook and the River Sowe.</p>
AP10 bullet 5	<p><i>Can the Environment Agency explain the green engineering solutions available as suitable alternatives to harm and scour protection?</i></p> <p>Our comments on green engineering were made for the applicant to consider alternatives to hard engineering, if possible and practicable. 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</p>	<p>The Applicant will consider green engineering alternatives during the detailed design stage of the Scheme, and will continue to work collaboratively with the Environment Agency to explore what is possible and practicable.</p>
AP14	<p><i>Action - 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 to date due to national security considerations.</i></p>	<p>No response required.</p>

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	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.	