

A46 Coventry Junctions (Walsgrave) Scheme Number: TR010066

8.17 Applicant's Comments on Local Impact Reports

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(j)

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

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

**APPLICANT'S COMMENTS ON LOCAL IMPACT
REPORTS**

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Contents

1. Introduction	3
Table 1-1 – Applicant's Comments On Coventry City Council Local Impact Report ...	4
Table 1-2 – Applicant's Comments On Warwickshire County Council's Local Impact Report	37
Table 1-3 – Applicant's Comments On Rugby Borough Council's Local Impact Report	42
Appendix 1 - Section Through Centre Of Smite Brook Culvert.....	49

1. Introduction

1.1 Purpose of this Document

- 1.1.1 This document relates to an application for a Development Consent Order made on 14 November 2025 by National Highways (the “Applicant”) to the Secretary of State for Transport via the Planning Inspectorate under section 37 of the Planning Act 2008. If made the Development Consent Order would grant consent for the A46 Coventry Junctions (Walsgrave) Scheme (the “Scheme”). The application was accepted for Examination on 12 December 2024
- 1.1.2 The purpose of this document is to set out the Applicant’s comments on Local Impact Reports received from Coventry City Council (**REP1-036**), Rugby Borough Council (**REP1-039**) and Warwickshire County Council (**REP1-040**), submitted at Deadline 1 of the Examination.
- 1.1.3 **Table 1-1** contains a full schedule of the Applicant’s comments on Coventry City Council Local Impact Report. **Table 1-2** contains a full schedule of the Applicant’s comments on Warwickshire County Council’s Local Impact Report. **Table 1-3** contains a full schedule of the Applicant’s comments on Rugby Borough Council’s Local Impact Report.

Table 1-1 – Applicant's comments on Coventry City Council Local Impact Report

Reference	Text from Local Impact Report	Applicant's Response
1. Introduction		
		No response required
2. Structure of the Report		
		No response required
3. Relevant Planning History		
3.1	There are no major applications or other applications of any relevance that would need to be taken into account by the applicant within Coventry that would have a significant impact on this development or need to be taken account of in terms of accumulation.	The Applicant notes this comment.
3.2	The applicant has highlighted two shortlisted developments within Figure 15.1 of the ES those being within Rugby's jurisdiction and CCC would agree that these right to have been included.	The Applicant notes this comment.
3.3	The only significant development that would be an accumulation within Coventry's administrative boundary has yet to come to fruition and is that of the housing allocation within the Local Plan which is highlighted within the policy summary in section 4 of this report. Any impact of that development, which is potentially is being unlocked by these works, would need to be justified and mitigated against separately as and when an application is made.	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
4. Policy Context		
4.1	Whilst the National Policy Statement for National Networks (NPS NN) is the primary policy document which will be used by the Examining Authority to assess the Scheme, it is also necessary to have regard to the provisions of the National Planning Policy Framework (NPPF) and Coventry's Local Plan 2017 and emerging Local Plan.	<p>This comment is noted by the Applicant.</p> <p>The Case for the Scheme (REP1-012) in Section 6 sets out how the Scheme conforms with planning policy and transport plans, including the NPPF, the adopted Local Plan and the emerging Local Plan.</p>
4.2	The National Planning Policy Framework (NPPF) was first published in 2012 and updated in 2018, 2019, 2021, and 2023. Paragraph 5 of the NPPF states that the document does not contain specific policies for NSIPs. These are to be determined in accordance with the decision-making framework set out in the Planning Act and relevant National Policy Statements (NPS) for nationally significant infrastructure, as well as any other matters that are considered both important and relevant (which may include the NPPF).	<p>This comment is noted by the Applicant.</p> <p>The Case for the Scheme (REP1-012) in Section 6 sets out how the Scheme conforms with planning policy and transport plans. How the Scheme accords with the National Networks National Policy Statement (NPS NN) (2024) is set out in National Networks National Policy Statement Accordance Tables (APP-133) and is summarised in the Case for the Scheme (REP1-012).</p>
4.3	Whilst the NPPF isn't used to determine DCO applications, there are elements which relate to various aspects of the A46 scheme, such as Transport, Natural Environment, Historic Environment, and Climate Change. The NPPF advocates partnership working between local authorities and highway authorities so that strategies and investments for supporting sustainable transport and development patterns are aligned.	<p>This comment is noted by the Applicant.</p> <p>The Case for the Scheme (REP1-012) in Section 6 sets out how the Scheme conforms with planning policy and transport plans.</p>

Reference	Text from Local Impact Report	Applicant's Response
4.4	<p>In terms of the economy, the NPPF indicates that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure or a poor environment.</p>	<p>This comment is noted by the Applicant.</p> <p>The Case for the Scheme (REP1-012) in Section 2 sets out the need for the Scheme. The Scheme will reduce congestion on the A46, this in turn will reduce negative impacts on users, local communities and the environment whilst balancing the need of individuals and businesses that use and rely upon the A46, thus having positive impacts on the economy. Coventry's Infrastructure Delivery Plan (IDP) is a key component of Coventry Local Plan (2017), it outlines the necessary infrastructure projects and investments required to support the city's growth and development.</p> <p>Policy JE1: Overall, Economy and Employment Strategy of the Coventry City Council Local Plan (2017) sets out that Council will look to support the provision of new infrastructure that supports sustainable economic growth and job creation which the Scheme will do.</p>
4.5	<p>National Planning Policy Guidance (NPPG) provides more detailed guidance to support policies in the NPPF. The following matters are covered by NPPG and are considered relevant to the A46:</p> <ul style="list-style-type: none"> • Air quality 	<p>This comment is noted by the Applicant.</p>

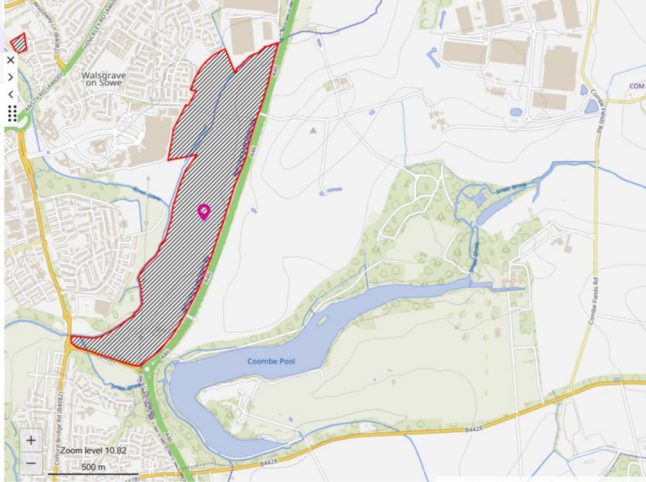
Reference	Text from Local Impact Report		Applicant's Response				
	<ul style="list-style-type: none">• Noise• Biodiversity Net Gain• Climate Change• Design• EIA• Flood risk• Healthy and Safe Communities• Historic Environment• Minerals• Natural Environment• Open Space and public rights of way• Transport evidence bases in plan making and decision taking.• Tree preservation areas and trees in conservation areas						
4.6	<p>The current local policy is provided within the Coventry Local Plan 2017, which was adopted by Coventry City Council on 6th December 2017. The relevant local plan policies have been set out below</p> <table><tr><th>Relevant LP Policy</th><th>Summary of relevant aspects of the policies</th></tr><tr><td>DS1: Overall Development Needs</td><td>Sets out the levels of housing, employment and retail development that will be planned for and provided along with supporting infrastructure and environmental enhancements – The provision includes min 24,600 additional homes and a min of 128ha of employment land within the city's administrative boundary</td></tr></table>		Relevant LP Policy	Summary of relevant aspects of the policies	DS1: Overall Development Needs	Sets out the levels of housing, employment and retail development that will be planned for and provided along with supporting infrastructure and environmental enhancements – The provision includes min 24,600 additional homes and a min of 128ha of employment land within the city's administrative boundary	<p>The Case for the Scheme (REP1-012) demonstrates how the Scheme adheres to the adopted Coventry Local Plan 2011-2031 (2017) policies of relevance in Table 6-1 of that document.</p> <p>Policy JE1 has been added to the Case for the Scheme (REP1-012) and this will be resubmitted at Deadline 3.</p> <p>Policy DS2 is only applicable to Local Planning Authorities and the production of Local Plans, therefore the Applicant does not consider it is really relevant to the Scheme.</p>
Relevant LP Policy	Summary of relevant aspects of the policies						
DS1: Overall Development Needs	Sets out the levels of housing, employment and retail development that will be planned for and provided along with supporting infrastructure and environmental enhancements – The provision includes min 24,600 additional homes and a min of 128ha of employment land within the city's administrative boundary						

Reference	Text from Local Impact Report		Applicant's Response
	DS2: Duty to co-operate	Sets out the commitment to work with neighbouring authorities to deliver the development needs from policy DS1	<p>Policy H2 is strategic policy that enables allocations on the Coventry City Council Policies Map. The Case for the Scheme (REP1-012) details the Local Plan allocations that are relevant to the Scheme, and specifically how the allocation statement for H2:3 has been taken into account.</p>
	DS3: Sustainable Development Policy	The Council will take a positive approach that reflects the presumption in favour of sustainable development and look to improve the economic, social and environmental conditions in the area	
	JE1: Overall, Economy and Employment Strategy	This sets out that Council will look to support the provision of new infrastructure that supports sustainable economic growth and job creation to which these works would ultimately do.	
	Policy H2: Housing Allocations	Housing allocation H2:3 Walsgrave Hill Farm, for up to 900 dwellings, sits adjacent to the A46 and covers the area to which part of the junction works sit. These works although will not physically provide access into the allocation will potentially provide the infrastructure and means of access to unlock the allocation. The allocation can be seen in figure 4.6.1 below	
	GB1: Green Belt and Local Green Space	The land west of the allocation and to the South of the B4082 are identified a local green space with this policy setting out that only small structures and buildings which are ancillary to the primary use of the land may be acceptable and other development will not be permitted unless very special circumstances are demonstrated.	

Reference	Text from Local Impact Report		Applicant's Response
	GE1: Green Infrastructure	Sets out Coventry's stance on protecting existing green infrastructure and making provision for new.	
	GE2: Green Space	Sets out that development involving the loss of green space that is of value for amenity, recreational, outdoor sports and or community use will not be permitted unless specifically identified as part of a strategic land use allocation.	
	GE3: Biodiversity, Geological, Landscape and Archaeological Conservation	Indicates that SSSI's, LNR's, Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced and that development proposals will be expected to ensure that they let to a net gain in biodiversity, where appropriate. Mitigation will be key where gain is not achieved. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable	
	GE4: Tree Protection	This sets out that any development will be looked at positively provided there is no unacceptable loss, or damage to existing trees or woodlands and any loss should be supported by a tree survey	
	DE1: Ensuring High Quality Design	This policy sets out the key principles of design for developments in the aim that proposals respect and enhance their surroundings and positively contribute towards the local identity and character of the area.	

Reference	Text from Local Impact Report		Applicant's Response
	HE2: Conservation and Heritage Assets	Sets out that proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. The heritage assets relevant in this case are Listed Buildings, Conservation Areas and Registered Park and Gardens.	
	AC2: Road Network	Sets out that new development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause un	
	AC4: Walking and Cycling	Development proposals should incorporate appropriate safe and convenient access to walking and cycling routes. Where these links do not exist, new and upgraded routes will be required and these must appropriately link into established networks to ensure that routes are continuous	
	EM1: Planning for Climate Change Adaptation	This sets out that all development is required to be designed to be resilient to, and adapt to the future impacts of, climate change using such measures as minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDS	
	EM4: Flood Risk Management	Sets out that all developments must be assessed in respect of the level of	

Reference	Text from Local Impact Report	Applicant's Response
		flood risk from all sources and that all opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage.
	EM5: Sustainable Drainage Systems (SuDs)	All development must apply SuDs and should ensure that surface water runoff is managed as close to its source as possible. The long-term maintenance arrangements for all SuDS must be agreed with the relevant risk management authority.
	EM7: Air Quality	This policy sets out that major development schemes will require the submission of an air quality assessment as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment.
	EM9: Safeguarding Mineral Resources	This site sits within a mineral safeguarding area for sand and gravel. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserve

Reference	Text from Local Impact Report	Applicant's Response
	<p>Figure 4.6.1 – Housing Allocation H2:3</p> 	
4.7	<p>Local Plan review is currently at Reg 19 consultation. Relevant emerging policy relating to this application are listed below. A summary hasn't been provided as these policies hold little weight at present. As you will see from the list below there are similar policies to that of the Local Plan which have been updated. For instance, policy GE3: Biodiversity now includes the requirement for 10% gain to bring it in line with national requirements. Other relevant policies have been updated to reflect latest national, regional and local policy and guidance for example prioritising walking, cycling and sustainable modes of travel. The housing allocation H2:3 is still included in the emerging local plan.</p>	<p>The Case for the Scheme (REP1-012) has been updated at Deadline 1 to acknowledge the Coventry City Council Reg 19 Local Plan consultation.</p>

Reference	Text from Local Impact Report	Applicant's Response
	<p>Policy DS1: Overall Development Needs Policy DS3: Sustainable Development Policy Policy H2: Housing Allocations Policy GB1: Green Belt and Local Green Space Policy GE1 Green Infrastructure Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation Policy GE4: Tree Protection</p> <p>Policy DE1 Ensuring High Quality Design Policy HE2: Conservation and Heritage Assets Policy AC2: Road Network Policy AC3: Demand Management Policy AC4: Walking and Cycling Policy EM1: Planning for Climate Change Adaptation Policy EM3 Renewable Energy Generation Policy EM4 Flood Risk Management Policy EM5 Sustainable Drainage Systems (SuDS) Policy EM7 Air Quality Policy IM1: Developer Contributions for Infrastructure</p>	
5. Landscape and Visual		
5.1	<p>The landscape visual assessment provided within the ES chapter 7 (APP-029) and the viewpoint photography and photomontages/visualisations (APP-050 & APP-051) have shown there to be some adverse effects of the development upon the landscape and visual appearance especially from Hungerley Hall Farm.</p>	<p>This comment is noted by the Applicant.</p>

Reference	Text from Local Impact Report	Applicant's Response
5.2	The views of the A45 at present, although adjacent, are limited from Hungerley Hall Farm due to the A45 road being within a cutting and the existing landscaping running alongside. However, the introduction of the new access road alongside the A45, at a higher level, via the new grade separated junction towards the B4082 would completely alter that visual outlook especially in the early stages of its use resulting in a negative appearance.	<p>This comment is noted by the Applicant.</p> <p>The Applicant understands the reference to the A45 in Coventry City Council's comment is a typo, and this should be A46.</p>
5.3	There is landscaping proposed to mitigate this negative impact in the form of mixed woodland between Hungerley Hall Farm and the new access road which overtime would result in views of a landscaping buffer and therefore improved outlook. The new landscaping would remove the element of openness once enjoyed and whilst the landscaping, once matured, would result in a much-reduced adverse impact it would nonetheless still, in the view of the council, be a negative impact from this viewpoint.	This comment is noted by the Applicant.
5.4	It is clear from this that the landscaping scheme and its management is key to the scheme as mitigation which also rolls into other following topics discussed within this report.	First Iteration Environmental Management Plan (EMP) (REP1-010), Appendix B.4 outlines the procedure for updating the Outline Landscape and Ecology Management Plan (OLEMP) into the Landscape and Ecology Management Plan (LEMP). This will be undertaken by the Principal Contractor and incorporated into the Second Iteration EMP as required before construction works commence.

Reference	Text from Local Impact Report	Applicant's Response
		<p>Compliance with this approach is secured through Requirement 4 in Schedule 2 of the draft Development Consent Order (DCO) (REP1-002) and adheres to the specifications outlined in the First Iteration EMP (REP1-010) and the Register of Environmental Actions and Commitments (REAC) (APP-110).</p> <p>Section 4.6 of the OLEMP focuses on the "Establishment, Management, and Maintenance" of the landscape. It indicates that during the detailed design phase, a Manual for Contract Documents for Highways Work (MCHW) Series 3000 Landscape and Ecology specification will be developed. This specification will guide general planting and seeding operations during the initial 30-year establishment and maintenance period. Additionally, Table 4-3 summarises typical management operations for the first five years. The LEMP will further outline specific management strategies, targets, and prescriptions tailored to each of the Landscape Elements (LEs). These comprehensive guidelines aim to ensure each LE achieves its intended ecological condition throughout the duration of the project.</p>
5.5.	The land within CCC administrative boundary is not allocated as Green Belt but we are aware that the land opposite within	This comment is noted by the Applicant.

Reference	Text from Local Impact Report	Applicant's Response
	RBC boundary is. As a Council we will not comment on the Green Belt aspect and leave that to RBC.	
5.6	In respect to the other viewpoints the impact will be neutral due to the existing landscaping and lie of the land which the works would not be visible from. The Council agree within the conclusions of the assessment and as a whole bar the views immediately adjacent to the works once the associated landscaping has matured would be of a neutral impact on the landscape.	This comment is noted by the Applicant.
6. Heritage and Conservation		
6.1	As highlighted in paragraph 1.5 of this report Hungerley Hall Farm (grade II listed building), Coombe Abbey (grade II* Listed Building and Coombe Abbey Registered Park and Garden/Conservation Area are located in close proximity to the development and therefore will be impacted upon.	This comment is noted by the Applicant.
6.2	The impact upon the Grade II Listed Building, Hungerley Hall Farm and its setting has been set out within Chapter 6 of the ES (APP-28) and the opinion of the Council's Conservation Officer shared within CCC's relevant representations (RR-013).	This comment is noted by the Applicant.
6.3	It was acknowledged that overall, it is considered the level of harm to the setting of the farm complex to be moderate, but with mitigation measures in the form of a landscaping scheme this level is reduced to minor less than substantial harm. Again, there is a big emphasis on the landscaping	As detailed in Environmental Statement (ES) Appendix 7.3 (Representative Viewpoints) (APP-072), Table 1-13 Viewpoint 13, by year 15 of operation, the Scheme will result in a minor adverse magnitude of change and a moderate adverse

Reference	Text from Local Impact Report	Applicant's Response
	<p>scheme and its management to ensure that the impact overtime is reduced. It is also important to consider mitigation measures in regard to noise and vibration on the impact of the listed building. The local impact in terms of the impact on the listed building is considered to be negative.</p>	<p>significance of visual effect at Hungerly Hall Farm. New planting will begin to mature, providing effective screening. The reinstated woodland belt along the embankments will significantly obscure the B4082 link road and A46 traffic at the former Walsgrave roundabout. However, some residual filtered visibility of large vehicles and associated infrastructure will remain due to their height. In winter, visibility of certain elements of the Scheme may increase through gaps in the woodland belt.</p> <p>Regarding long-term Scheme management and maintenance, as outlined in the First Iteration EMP (REP1-010), Appendix B.4 describes the procedure for updating the OLEMP into the LEMP. This process will be carried out by the Principal Contractor and will be incorporated into the Second Iteration EMP as required before construction works commence. This approach complies with Requirement 4 in Schedule 2 of the draft DCO (REP1-002) and aligns with the specifications outlined in the First Iteration EMP (REP1-010) and the REAC (APP-110).</p> <p>Section 4.6 of the OLEMP addresses the "Establishment, Management, and Maintenance" of the landscape. It states that during the detailed design phase, a MCHW Series 3000 Landscape and</p>

Reference	Text from Local Impact Report	Applicant's Response
		Ecology specification will be developed. This specification will guide planting and seeding operations during the initial 30-year establishment and maintenance period. Additionally, Table 4-3 summarises typical management operations for the first five years. The LEMP will outline specific management strategies, targets, and prescriptions tailored to each of the Landscape Elements (LEs). These comprehensive guidelines are intended to ensure that each LE achieves its desired ecological condition throughout the project's duration.
6.4	The Coombe Abbey Registered Park and Garden is the next closest heritage asset to the junction works but located within the administrative boundary of RBC. It is however the opinion of CCC that the majority of the works that see new infrastructure in the form of the grade separated junction and associated roundabouts are located further along the A46 where Coombe Park starts to pull away from the A46 therefore reducing any impact on the park itself and its setting.	This comment is noted by the Applicant.
6.5	<p>Archaeology</p> <p>With regards to archaeology again the opinions of the Council's archaeologist were given within CCC's relevant representations (RR—013) which stated that a series of work has been conducted to assess the archaeological potential of</p>	This comment is noted by the Applicant.

Reference	Text from Local Impact Report	Applicant's Response
	site and has uncovered limited archaeological remains. It is considered of low potential that further archaeological remains will be uncovered however it is important that the identified mitigations and monitoring as set out in APP/6.5 are adhered to. It is therefore considered the impact of the development on archaeology to be neutral .	
7. Biodiversity		
7.1	The Environmental Masterplan that has been provided as part of the ES (APP-043) which appears to have maximised habitat creation where possible.	This comment is noted by the Applicant.
7.2	The ES Appendix 8.1, Biodiversity Net Gain Report (APP-076) details the Biodiversity Net Gain calculations undertaken for the Scheme, based upon the Environmental Masterplan stated above. The Council agree with the methodology and the calculations provided which shows there to be over a 10% biodiversity net gain, which has to been seen as a positive from the works.	This comment is noted by the Applicant.
7.3	The ES chapter 8 on Biodiversity (APP-30) includes the assessment to determine any potential likely significant effects of the scheme upon Biodiversity both during construction and operation. The Council agree with the assessment but as per the Relevant Representations (RR-013) want to highlight paragraph 8.6.5 and 8.6.6 which indicate that the results of the Preliminary Ecological Appraisal should be reviewed prior to construction to identify	Targeted update phase 2 surveys for roosting bats, great crested newt, badger, barn owl, otter and water vole are being undertaken in the appropriate seasons in 2025 and 2026 to inform constraints to construction. Commitment BD2 in the First Iteration EMP - Appendix A REAC (APP-110) details this requirement for update surveys.

Reference	Text from Local Impact Report	Applicant's Response
	areas where protected species have previously been recorded 'likely absent' from suitable habitats that maybe directly impacted and therefore may require re-surveying to ensure the species is still absent. This would help reduce any potential impacts.	An update UK Habitat classification and species scoping has been undertaken in 2025 to establish an up-to-date baseline with regards to habitats within the Order Limits and potential for protected and notable species. The update survey identified no changes to the habitats within the Order Limits or the potential for protected or notable species.
7.4	The ES chapter 8 continues to present the mitigation and enhancements that the scheme would deliver. The creation of drainage features, hedgerows, lines of trees, species-rich grassland, woodland and scrub habitats along the Scheme (including the existing Walsgrave roundabout) would create more foraging habitat for birds, bats, badgers, hedgehogs and polecats. As such, the creation of these areas would be seen as a positive impact upon the local area.	This comment is noted by the Applicant.
7.5	The emphasis on whether the impact would be indeed an infinite positive would be on the management of the landscaping post development and also the management of the development through the construction process.	The First Iteration EMP Rev 1 (REP1-010) Appendix B.4 OLEMP details landscape and ecological mitigation and compensation requirements for the Scheme and identifies delivery and management requirements for the mitigation and compensation. The document and later versions will "... <i>cover protection of landscape and ecology during construction, reinstatement of vegetation and habitats post construction, and the implementation of ecological mitigation measures, together with the subsequent aftercare and, where applicable, monitoring arrangements. The LEMP will be in line</i>

Reference	Text from Local Impact Report	Applicant's Response
		<p><i>with the habitat targets specified within the ES Appendix 8.1 (Biodiversity Net Gain Report) (TR010066/APP/6.3)."</i></p> <p>Management throughout the construction process is detailed within the First Iteration EMP - Appendix A REAC (APP-110).</p>
8. Flooding and Drainage		
8.1	The submitted flood risk assessment within the ES appendix 13.1 (AS-012) evaluates the risk of flooding and its relevant impacts as a result of the scheme. The flood risk assessment includes reference to the Coombe Pool Flood Mitigation scheme.	This comment is noted by the Applicant.
8.2	<p>The FRA concludes that the Scheme will be safe for its lifetime and will not increase flood risk elsewhere. This is achieved through:</p> <ul style="list-style-type: none"> - 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. - Not increasing flood risk within Flood Zone 3b with no requirement for floodplain compensation 	The Applicant notes Coventry City Council's response.

Reference	Text from Local Impact Report	Applicant's Response
8.3	With regards to the findings of the flood risk assessment the Council is satisfied for all elements other than the assessment of residual risk associated with the failure of the Coombe Pool reservoir to which further discussions are still on going.	The Applicant notes Coventry City Council's response, especially that all elements for the Flood Risk Assessment (Rev 1) (ES Appendix 13.1 (AS-012)) are agreed other than the residual flood risk associated with the residual risk of reservoir flooding, the Coventry City Council Statement of Common Ground (REP1-023) will be updated in due course to reflect this.
8.4	With regards to the Reservoir Flood Risk, National Planning Policy is clear that flood risk should not be increased elsewhere. Flooding from all sources is a material consideration and it is noted that circa 500 properties are identified as being at risk during the wet day scenario within the Reservoir Flood model albeit, risk is cited as residual. The earthwork embankment between the A46 and Coombe Pool is being reduced in height and the impact on residual risk needs to be understood to avoid sole reliance upon emergency plans without a clear understanding of the impact on risk and if further residual risk measures are needed. The Council understands the adverse effect on National Security and Public Safety concern in releasing the Reservoir Flood Model for use, however the Council have written to the Environment Agency Deputy Director – Environmental Assessment and Reservoir Regulation to request the release of the model under a confidentiality agreement to National Highways and their consultants to allow their better	The Applicant set out in the response to ISH1 agenda item 8.2 (REP1-031) the FRA (ES Appendix 13.1 (AS-012)) that Coombe Pool is classified as a Category B large raised reservoir under the Reservoirs Act, 1975. This requires that a robust inspection, maintenance and management regime is put in place by the reservoir owner and operator (Coventry City Council) and overseen by the Environment Agency. This means that any failure of the reservoir is unlikely and is classed as a residual risk, as set out in paragraph 4 of the Flood and Coastal Change PPG. However, in the very unlikely event of a sudden catastrophic failure of Coombe Pool, then the water which is currently retained would pond behind the A46. Under the current scenario the water would reach greater depths behind the bund in its current form than the proposed scenario. Coventry City Council agree that it is unlikely that this bund was constructed as a

Reference	Text from Local Impact Report	Applicant's Response
	<p>understanding of any change in risk. The Council understands that this process is in progress.</p>	<p>water retaining structure, therefore in such an event it would be likely to rapidly fail releasing water across the A46. However, in the proposed scenario, lower depths of water would be retained, and the elements of the retained bund would be strengthened to help prevent rapid failure.</p> <p>It should be noted that the wet day scenario that Coventry City Council refer to is a scenario that assumes that the reservoir fails during a 1 in 1,000 year flood event in the River Sowe, this is significantly beyond the design standard (1 in 100 year) set out in the Flood and Coastal Change Planning Practice Guidance (2022).</p> <p>The Applicant is yet to receive the Environment Agency's reservoir flood model.</p> <p>In light of the above, the Applicant considers that the FRA (ES Appendix 13.1 (AS-012)) is proportionate to the risk and appropriate to the scale and nature of the Scheme as the residual risk of reservoir failure adequately and appropriately considered with no requirement to undertake modelling of reservoir failure. The Applicant therefore considers that the FRA (ES Appendix 13.1 (AS-012)), which has been undertaken in accordance with the requirements set out in DMRB (LA 113), NPS NN, the NPPF and the Flood Risk and Coastal Change PPG and the British</p>

Reference	Text from Local Impact Report	Applicant's Response
		Standard (BS 8533:2017 – with approval from the Environment Agency in their role as the 'appropriate authority' as set out in the Reservoirs Act 1975), is proportionate to the risk and appropriate to the scale and nature of the Scheme as the residual risk of reservoir failure adequately and appropriately considered with no requirement to undertake modelling of reservoir failure.
8.5	The Council had highlighted, during discussions with the applicant, some concern with the height of the embankment at the location of the Smite Brook culvert under the A46. Following this the applicant provided a cross section on the 25th April 2025 which showed a greater proportion of the bund remaining than was initial understood by CCC. The section shows over half the bund height above the culvert soffit being retained. The section shows the top of the bund will be 3.993m above the culvert soffit, as currently the bund is 6.337m high, which places the proposed bund 0.827m higher than the current halfway point. The halfway point is the critical level that was discussed with the applicant and is substantially above the flood levels observed by the Council (Jan 2024 and Jan 2025). This plan has provided comfort to the Local Lead Flood Authority Officer of the Council.	The Applicant notes Coventry City Council's position and has attached the cross section referenced by Coventry City Council in their response to aid the ExA's understanding of Coventry City Council's position. This cross-section is included in Appendix A of this document: <i>Section Through Centre of Smite Brook Culvert</i> .
8.6	With regards to the principle of the location of the proposed balancing ponds the Council are satisfied and acknowledge	The Applicant notes Coventry City Council's response, the Coventry City Council Statement of

Reference	Text from Local Impact Report	Applicant's Response
	that there will further discussions with the applicant during the detailed design stage to refine the design detail and ensure maintenance access is accommodated. If the details are satisfactory and the further discussions ascertain a better understanding of any change in risk the impact will overall be neutral	Common Ground (REP1-023) will be updated in due course to reflect this. The Applicant will consult with Coventry City Council's during detailed design stage and in accordance with Requirement 3 Detailed design and Requirement 9 Surface water drainage, of the draft DCO (REP1-002).
Noise and Vibration		
9.1	Chapter 11 of the ES, Noise and Vibration, assesses the impact of the construction and operation of the development upon residential and non-residential receptors.	The Applicant notes this comment.
9.2	The conclusion of the assessment is that in regard to construction noise is that adverse impacts would occur without mitigation at some of the receptors closest to the construction works. Suitable means of minimising the potential for significant adverse have been highlighted including the provision of temporary acoustic barriers.	The Applicant notes this comment.
9.3	The noise impact from construction works is considered to constitute a negative impact. However, this is temporary and would cease upon completion of construction. It is noted that the project is likely to take a significant number of years.	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
9.4	In regard to the operational noise the assessment 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. There are no acoustic barriers recommended or identified as part of the scheme although the access slip road will be moved closer to a residential receptor of Hungerley Hall Farm.	The Applicant notes this comment.
9.5	The use of a low noise surface combined with improving the flow of traffic which at present is consistently congested at this section of the A46 and the Clifford Bridge Road junction would improve the existing noise levels and with other aspects of mitigation related to other topics within the report the impact although negative would be reduced to an extent which depending on road conditions could be acceptable. For this reason, the Council would agree with the findings of the assessment in regard to noise which would result in a neutral impact.	The Applicant notes this comment.
9.6	The anticipated vibration from the construction of the junction works is anticipated to have no significant adverse effect at any vibration-sensitive receptor where mitigation is implemented. The mitigation is given in the first iteration of the EMP (APP 6.5).	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
9.7	It is welcomed that vibrations created by compaction works (or other construction work types with high vibration emissions) which occur within approximately 10m of the Listed structures at Hungerley Hall Farm have been highlighted as to be designed so that vibration emissions are sufficiently limited at this location, and vibration monitoring shall be undertaken where necessary. This has taken into consideration the Listed Building and whilst again similar to the noise aspect the construction works would constitute a negative impact this would be temporary for the duration of the works.	The Applicant notes this comment.
10. Traffic and Transport		
10.1	Coventry City Council, CCC, welcomes this Scheme going forward for a Development Consent Order, DCO, as our view remains that an all-movements junction is essential at this location. The proposed design will maximise access to the A46, and the wider Strategic Road Network, from northeast Coventry without putting undue pressure on the local road network, on the A428 / A46 Binley Junction and on the M6 Junction 2.	The Applicant notes this comment.
10.2	During the development, consultation and progression through the Development Consent Order process several issues have been discussed and agreed to ascertain the Local Impact of the scheme in terms of Highway and Transport. These areas include:	The Applicant notes this comment.


Reference	Text from Local Impact Report	Applicant's Response
10.3	<p>Traffic Modelling</p> <p>Modelling carried out, by National Highways, NH, during the progression of the feasibility design aligned to modelling and assumptions made by CCC. Namely that overall, the scheme draws local traffic on to the more appropriate Strategic Route Network. Increases can be seen on several Coventry links; however, these are not seen as significant and overall, the modelling shows a positive impact on traffic in the area.</p>	The Applicant notes this comment.
10.4	<p>During the modelling CCC has brought to the attention of NH's consultants a large business campus and freight distribution planning application, being made in Rugby, which has access just off M6 Junction 2. The application will introduce a large amount of traffic onto the Strategic and Local road networks. At the time of the modelling the site did not have any status, and it was not possible to include the site in the modelling. As of May 2025, the scheme now has a resolution to grant permission, subject to being called in by Secretary of State. As such the site will need to be included in the modelling being used for the detail design. The increase in traffic will further strengthen the need for the Walsgrave improvement, therefore this has been assessed as having a neutral impact.</p>	<p>This site has been assessed in the updated Uncertainty Log that is used as the basis for the next round of traffic modelling.</p> <p>Developments are included in the model scenarios based on their level of certainty as defined by the relevant Local Authority (Warwickshire County Council) and in line with the Department for Transport, Transport Analysis Guidance (Unit M4), Forecasting and Uncertainty (TAG unit M4 forecasting and uncertainty - GOV.UK).</p> <p>Given the size and location of the site and the date of resolution to grant permission, final confirmation of the certainty was requested from Warwickshire County Council in June 2025, the latest date possible before the revised forecast modelling is carried out.</p> <p>This has updated the development certainty status to "Near Certain" based on the definitions within the</p>

Reference	Text from Local Impact Report	Applicant's Response
		<p>guidance and as assessed by Warwickshire County Council.</p> <p>As such, it will be included in the Core scenario modelling as part of the next model update which provides flow data for detailed design.</p>
10.5	<p>Accessibility and Integration</p> <p>CCC are actively seeking to provide active and sustainable travel routes across the Eastern Bypass in this location. Despite it no longer being needed NH has agreed to retain the Hungerley Hall Farm accommodation overbridge as part of the Scheme, and will continue to maintain the asset, until such time CCC and colleagues at Warwickshire can agree and develop an active travel route, linking Coventry to Coombe Country Park. The retention of the bridge is seen as a positive impact.</p>	The Applicant notes this comment.
10.6	<p>CCC's current thoughts on the active travel link would be for it to link to the nearby Binley Cycle route. The Council has supplied the Inquiry and indicative route for the link. To enable these future works NH has agreed to undertake additional earth works to provide widening of the verge along the new section of the B4082 and dedicated a small area of land to the Council, to facilitate the future provision of an LTN 1/20 compliant route. This is seen as a positive impact of the scheme.</p>	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
10.7	During the progression of the scheme CCC raised concerns that the final design must cater for a range of public transport uses. Since the consultation response CCC has continued to work with NH and we are content that the current design is suitable for public transport including the future development of the Coventry Very Light Rail scheme. This is seen as a neutral impact of the scheme.	The Applicant notes this comment.
10.8	<p>Design</p> <p>The design of the western roundabout, as per discussions with CCC, is sufficiently large to facilitate the construction of an additional arm that could provide access to both the proposed Walsgrave Hill development, an allocated site within the Coventry Local Plan, and an access to the University Hospital Coventry and Warwickshire. In CCC's view, it is essential that this access is allowed for in the Scheme design to facilitate the allocated development as well as improving the accessibility of the hospital.</p>	The Applicant will deliver the western roundabout as shown within the application documents, to ensure the Scheme can accommodate a future link to the hospital.
10.9	The access to the University Hospital Coventry and Warwickshire remains one of the key issues for the Council's Members, local residents and the hospital itself. NH has committed to continue to work with the Council and the Developers is noted and we hope that more detailed plans will be available as the detailed design progresses. This is seen as a neutral impact of the scheme.	The Applicant will continue to liaise with Coventry City Council throughout detailed design.

Reference	Text from Local Impact Report	Applicant's Response
10.10	<p>Construction Traffic</p> <p>The Construction Environmental Management Plan has yet to be produced for the scheme, but CCC expects there will be a detrimental impact to network performance of the Strategic and Local Road Networks at various stages of the schemes construction.</p>	The Applicant notes this comment.
10.11	<p>During the construction period it is expected that journey times around the area will be negatively impacted. We will work with NH during these periods to ensure that the Traffic Management is appropriate but feel this will be a necessary negative impact of the scheme.</p>	The impact on journey times during the construction period has been assessed and included in the economic appraisal of the Scheme set out in the Case for the Scheme (REP1-012).
10.12	<p>Clifford Bridge Road</p> <p>The B4082 as it connects to Coventry's Local Network continues North and South as Clifford Bridge Road. To the North Clifford Bridge Road serves as a route to residential areas and is the direct access for a food retail development and the University Hospital Coventry and Warwickshire. This part of the network is very busy particularly in peak periods, experiencing congestion and delays.</p>	<p>The Applicant notes this comment.</p> <p>Assessment of traffic flows in this area are included in the traffic modelling as discussed in the Transport Assessment (APP-134).</p>
10.13	<p>Although the issues being experienced on Clifford Bridge Road are not because of the proposed junction improvement nor will it be exacerbated by its implementation. However, it</p>	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
	is going to have to be carefully considered when creating the traffic management plan for the construction period.	
10.14	As mentioned in paragraph 10.9, the only access to the University Hospital Coventry and Warwickshire, is on Clifford Bridge Road. The congestion on the Local Network and internally to the hospital itself, remains one of the key issues for the Council's Members, local residents and the hospital.	<p>The Applicant notes this comment.</p> <p>Assessment of traffic flows in this area are included in the traffic modelling as discussed in the Transport Assessment (APP-134).</p>
10.15	Subject to well design traffic management it is hoped this will be a neutral impact of the scheme's construction.	<p>The Outline Traffic Management Plan (APP-136) sets out the proposals for the temporary traffic management measures required during construction of the Scheme. It will be developed into the Traffic Management Plan for implementation during construction.</p> <p>Relevant customer and stakeholder groups have been identified by the Scheme during ongoing engagement to date. These stakeholder groups will continue to be consulted by the appointed Walsgrave Junction Stakeholder and Communications Lead alongside wider National Highways Communications.</p>
Air Quality		
11.1	Coventry City Council designated the City area as an air quality management area (AQMA) from 1st November 2009	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
	<p>due to elevated, yearly levels of nitrogen dioxide (NO₂). Figure 11.1.1 shows the extent of the Coventry AQMA, which reflects the cities administrative boundary.</p> <p>Figure 11.1.1 Coventry AQMA</p> 	
11.2	<p>While levels of particulate matter (PM₁₀) in Coventry do not breach Air Quality Objectives it is acknowledged that fine particulate matter levels have a significant impact on health across the City. Around 1 in 20 deaths in Coventry can be attributed to concentrations accounting for 168 deaths (over 25s) and 1882 associated life-years lost in 2010. For the purpose of improving air quality and health impacts in</p>	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
	Coventry an air quality SPD was produced in August 2019 concerned with achieving and maintaining compliance with the National Air Quality Objectives and with improving air quality further, particularly with respect to particulate concentrations.	
11.3	Chapter 5 of the ES (APP-27) on Air Quality has assessed the impact of the construction and operation of the proposed works. It is concluded as predicted that there would be a 'large' dust risk potential during the construction phase of the scheme with the receiving environment sensitivity being 'high'. There are mitigation measures being included in the scheme to suppress this impact. The assessment concluded that the impact of construction dust is unlikely to trigger a significant air quality effect, but nonetheless there would be an impact which would be a negative local impact at the construction phase.	<p>With effective implementation of the appropriate best practice mitigation measures during construction, there should be no discernible impact on local air quality. As such, the residual impact should be neutral.</p> <p>The respective mitigation measures are presented as part of the Outline Air Quality and Dust Management Plan, which forms Appendix B.1 of the First Iteration EMP (REP1-010).</p> <p>This will be developed into an Air Quality and Dust Management Plan during detailed design and form part of the Second Iteration EMP (Commitment AQ1 of the REAC, Appendix A of the First Iteration EMP (APP-110)).</p> <p>The Second Iteration EMP is secured in the draft DCO (REP1-002) through Requirement 4.</p>
11.4	The chapter continued to conclude that following a detailed and verified air quality modelling exercise which included 94	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
	discrete sensitive receptors, the modelling has demonstrated that the air quality objectives for NO2 and PM10 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 Council agree with the assessment undertaken. Improving the flow of the A46 and removing the constant congestion at this junction would improve the air quality. This improvement to the A46 junction would reduce the amount of users diverting from it and driving through Coventry to avoid any congestion which in itself would improve Air Quality for the City. It is seen by Coventry City Council that the operational local impact on Air Quality would be a Neutral Impact.	
Summary		
12.1	CCC welcome this development as it will significantly improve traffic flows at this key junction on the A46 relieving congestion and improving accessibility from Junction 2 of the M6 along the A46 to the M5, M40 and M42.	The Applicant notes this comment.
12.2	These works are the final piece of the jigsaw to the A46 improvements which have already seen two other junctions improved. The works won't just improve the flow of traffic but would potentially provide an opportunity to unlock a housing allocation, H2:3 of the Coventry Local Plan and in turn provide potentially a much-needed blue light access to and from the Coventry and Warwickshire University Hospital.	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response																								
12.3	<p>There are varying local impacts created by the works which vary across the differing topics explored in the ES and would differ throughout the different stages of the works. A summary of those impacts has been given in the table below which include the numerous elements of mitigation proposed.</p> <table border="1"> <thead> <tr> <th>ES Chapter</th><th>Stage of Works</th><th>Impact</th></tr> </thead> <tbody> <tr> <td>Landscape Visual</td><td>Construction Operational</td><td>Negative Neutral</td></tr> <tr> <td>Heritage and Conservation</td><td>Construction Operational</td><td>Negative Negative</td></tr> <tr> <td>Biodiversity</td><td>Construction Operational</td><td>Neutral Positive</td></tr> <tr> <td>Drainage and Flooding</td><td>Construction Operational</td><td>Neutral Neutral</td></tr> <tr> <td>Noise and Vibration</td><td>Construction Operational</td><td>Negative Neutral</td></tr> <tr> <td>Transport and Traffic</td><td>Construction Operational</td><td>Negative Positive</td></tr> <tr> <td>Air Quality</td><td>Construction Operational.</td><td>Negative Neutral</td></tr> </tbody> </table>	ES Chapter	Stage of Works	Impact	Landscape Visual	Construction Operational	Negative Neutral	Heritage and Conservation	Construction Operational	Negative Negative	Biodiversity	Construction Operational	Neutral Positive	Drainage and Flooding	Construction Operational	Neutral Neutral	Noise and Vibration	Construction Operational	Negative Neutral	Transport and Traffic	Construction Operational	Negative Positive	Air Quality	Construction Operational.	Negative Neutral	The Applicant notes this comment, and the impacts are discussed in more detail throughout this table.
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Table 1-2 – Applicant's comments on Warwickshire County Council's Local Impact Report

Reference	Text from Local Impact Report	Applicant's Response
1. Context		
	This document provides details of the anticipated impacts of the A46 Walsgrave improvements for those living, working and/or visiting Warwickshire. It focuses on the broader outcomes of the planned investment which is the subject of the Development Consent Order; details of the specific local impacts of the proposed scheme and any planned mitigation (where appropriate) are covered in the Statement of Common Ground agreed between the applicant (National Highways) and Warwickshire County Council.	The Applicant notes this comment.
2. Key Impacts and Outcomes		
	There are four key impacts/outcomes which the A46 Walsgrave improvements will have on Warwickshire. These are set out below:	The Applicant notes this comment.
	<p>a) Route Consistency and Performance</p> <p>The A46 trunk road is a strategically significant route on the national road network linking the East of England and East Midlands with the South West. The route has seen a sustained period of investment over the last 25 years, with major improvements carried out at M40 Junction 15 (Longbridge near Warwick), A45/A46 Tollbar End (Coventry), A46/A4177/A425 Stanks (Warwick), A46/C32 Stoneleigh (between Kenilworth and Coventry, currently under</p>	The Applicant notes this comment.

Reference	Text from Local Impact Report	Applicant's Response
	<p>construction) and most recently at A46/A428 Binley Woods. Delivery of the proposed improvements to the A46 Walsgrave junction will mean that all junctions on the A46 between the M6/M69 at Ansty and the M40 near Warwick will be grade-separated. This will bring a consistency to the route which will deliver journey time reliability benefits and safer journeys for users. A properly functioning Strategic Road Network (SRN) will also mean that trips are unlikely to divert to less appropriate routes on the local road network in Warwickshire (and Coventry) if there is a more reliable journey time on the SRN.</p>	
	<p>(b) Supporting Economic Growth</p> <p>The economic prosperity of the Midlands relies heavily on the performance of the SRN. The A46/M69 corridor is particularly important within that network given its interface with a number of other key routes including the M1, M5, M6, M40 and A5. Research by Midlands Connect, the Sub-National Transport Body for the pan-Midlands area has identified the A46 as a nationally significant economic corridor that supports 2.9 million jobs and generates £115 billion output annually – equivalent to 9% of the total English economy. 22% of all goods and services produced in the A46 corridor are exported, demonstrating the importance of access to the</p>	<p>The Applicant notes these comments. The economic and wider need case of the Scheme is set out in the Case for the Scheme (REP1-012).</p>

Reference	Text from Local Impact Report	Applicant's Response
	<p>Humber and Bristol/South Wales ports at either end of the corridor as well as Birmingham and East Midlands airports.¹</p> <p>The A46 plays a significant role in supporting the sub-regional economies of Leicestershire, Coventry, Warwickshire, Worcestershire and Gloucestershire. The corridor is home to a number of key employment sectors who rely on the A46, including Aerospace, Advanced Manufacturing and Engineering, Logistics and Distribution and Agriculture/Agri-tech, with businesses such as Jaguar Land Rover, Rolls Royce and Volvo having a major presence. The regionally significant Gigafactory site near Whitley and the Fraser Group development near Ansty which has recently secured planning permission will also both be supported by the proposed investment in the A46 corridor at Walsgrave. It will also help support and mitigate future growth in the emerging Local Plans for Rugby and South Warwickshire (a joint plan being produced by Warwick District Council and Stratford-on-Avon District Council), for which the A46 corridor is a key asset. The scheme may allow development to take place in the corridor (both locally and strategically) that would have otherwise been constrained had the investment at Walsgrave not taken place.</p>	
	c) Network Resilience	The Applicant notes this comment.

¹ A46 Corridor Study Stage 1, Enhanced Strategic Case – Midlands Connect (November 2018) and A46 Corridor Study Stage 2, Technical Study – Midlands Connect (November 2020)

Reference	Text from Local Impact Report	Applicant's Response
	<p>Current traffic movements between the M1 and M5 rely heavily on the A42/M42 and congested Birmingham Motorway Box (M5/M6/M42). The planned investment at Walsgrave and the resultant route consistency, performance and safety benefits described above will improve the overall network resilience of the Strategic Road Network and allow the A46/M69 to provide a genuine alternative for trips between the M1 and M5. This will bring wider benefits for released capacity across parts of the Midlands network.</p>	
	<p>(d) Reducing Severance and Improving Access</p> <p>There are currently limited opportunities for Non-Motorised Users (NMU's) to safely cross the A46 trunk road in the vicinity of the Walsgrave junction, creating severance with the employment area around Ansty Park and the nature reserve/countryside facility at Coombe Abbey². The scheme to improve the A46 Walsgrave junction includes some passive provision to allow for improved pedestrian and cycle infrastructure to be made in the future (possibly linked to new development in the area). This includes: - A potential cross-county pedestrian/cycle leisure route along the bridleway between Brandon and Coombe Abbey; and - A potential pedestrian/cycle route following the bridleway between Walsgrave and Ansty Park. Increased opportunities for</p>	<p>The referenced improvements (Brandon to Coombe Abbey) and (Walsgrave to Ansty) are identified within the Warwickshire LCWIP Part 2 (Rugby).</p> <p>The Walsgrave to Ansty Park proposals relate to improvement of the bridleway via the Farber Road overbridge. The Brandon to Coombe Abbey route is south of the B4027 Brinklow Road and is not expected to interact with the A46 scheme.</p> <p>A WCH assessment was undertaken for the Scheme and the outcome is provided in ES Chapter 12 (Population and Human Health) (APP-034). Surveys undertaken as part of the assessment identified that the section of the bridleway to the east of the A46, and specifically, to the east of the Coombe Abbey</p>

² Warwickshire Local Cycling and Walking Infrastructure Plan (LCWIP): Part 2 (Rugby) - Warwickshire County Council (February 2024)

Reference	Text from Local Impact Report	Applicant's Response
	<p>walking and cycling have been shown to have physical and mental health benefits for both adults and children.</p>	<p>Park entrance (via the permissive route), was notably less utilised than the sections to the west. The assessment concludes that the route is used for leisure purposes to access the park from Walsgrave side. The route is not considered appropriate for commuter trips to Ansty Park from Walsgrave, due mainly to the walking distance.</p> <p>Details of the design mitigation and enhancement measures are shown on ES Figure 12.3 (Design mitigation and enhancement measure) (APP-058), which includes the passive provision as detailed. The proposed mitigation has been identified with full cognisance of the schemes identified in the above referenced LCWIP.</p>

Table 1-3 – Applicant's comments on Rugby Borough Council's Local Impact Report

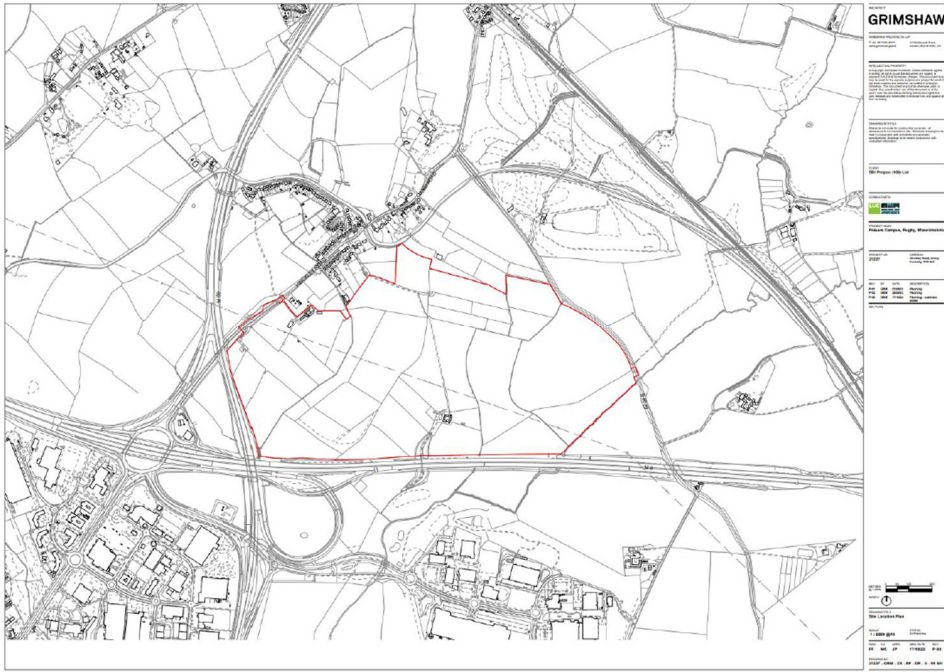
Reference	Text from Local Impact Report	Applicant's Response
1	<p>It is not the intention of Rugby Borough Council to submit a detailed local impact report.</p> <p>A statement of applicable development plan policies is set out in our relevant representations (RR) dated 27 February 2025.</p> <p>Rugby Borough Council's scrutiny and responses to the proposals to date is summarised in its statement of common ground (SOCG) with National Highways.</p>	The Applicant notes this comment.
2	<p>As detailed therein, there remains one outstanding matter under discussion which concerns accessibility and integration for walkers, cyclists and horse-riders (WCH). At present accessibility across the A46 for WCH from Coventry to Combe Abbey and Prospero Ansty business park is poor. The A46 Walsgrave scheme presents an opportunity to improve that accessibility.</p> <p>As set out in the SOCG, Rugby Borough Council seeks improvements to PRow R75x/R75b together with improved links between Coventry and Coombe Abbey. In lieu of the applicant providing this infrastructure, Rugby Borough Council seeks a Development Consent Obligation agreement to secure funds to enable these upgrades and connections.</p>	A WCH assessment was undertaken for the Scheme and the outcome is provided in ES Chapter 12 (Population and Human Health) (APP-034). Surveys undertaken as part of the assessment identified that the section of the bridleway to the east of the A46, and specifically, to the east of the Coombe Abbey Park entrance (via the permissive route), was notably less utilised than the sections to the west. The assessment concludes that the route is used for leisure purposes to access the park from Walsgrave side. The route is not considered appropriate for commuter trips

Reference	Text from Local Impact Report	Applicant's Response
		<p>to Ansty Park from Walsgrave, due mainly to the walking distance.</p> <p>Details of the design mitigation and enhancement measures are shown on ES Figure 12.3 Design mitigation and enhancement measure) (APP-058).</p> <p>As previously stated, the Applicant considers that all reasonable opportunities for connecting communities and enabling future active travel provision have been explored, and the objectives of the Scheme have been met.</p>
3	<p>We would highlight one further local impact not covered in the SOCG or RR. On 7 May 2025 full planning permission was granted for:</p> <p>Creation of an employment-led headquarters campus development, composed of head office and distribution/warehouse facilities, concept research and development retail and leisure (including gym, swimming pool, fitness studio/sports hall, sport pitches and associated facilities), ancillary food and beverage and convenience retail, onsite accommodation including a hotel and group accommodation, learning and development academy (including auditorium and training rooms), supplier offices, nursery, helipad, landscaping and ecological enhancements, site contouring, earth bunds, drainage, surface and multi-storey car parking, cycle parking, access roads, cycleways and</p>	<p>The Applicant notes this planning permission and the importance of that the Scheme is delivered to enable this.</p>

Reference	Text from Local Impact Report	Applicant's Response
	<p>footways, permanent ingress/egress points, utility diversions, ancillary buildings and structures, temporary construction ingress/egress, associated infrastructure and works, and demolition of existing buildings/structures.</p> <p>at Crowner Fields Farm and Home Farm, Hinckley Road (B4065), Ansty, Warwickshire, CV7 9JA (Rugby Borough Council planning reference R23/1027). A site location plan for that development is appended to this letter.</p>	

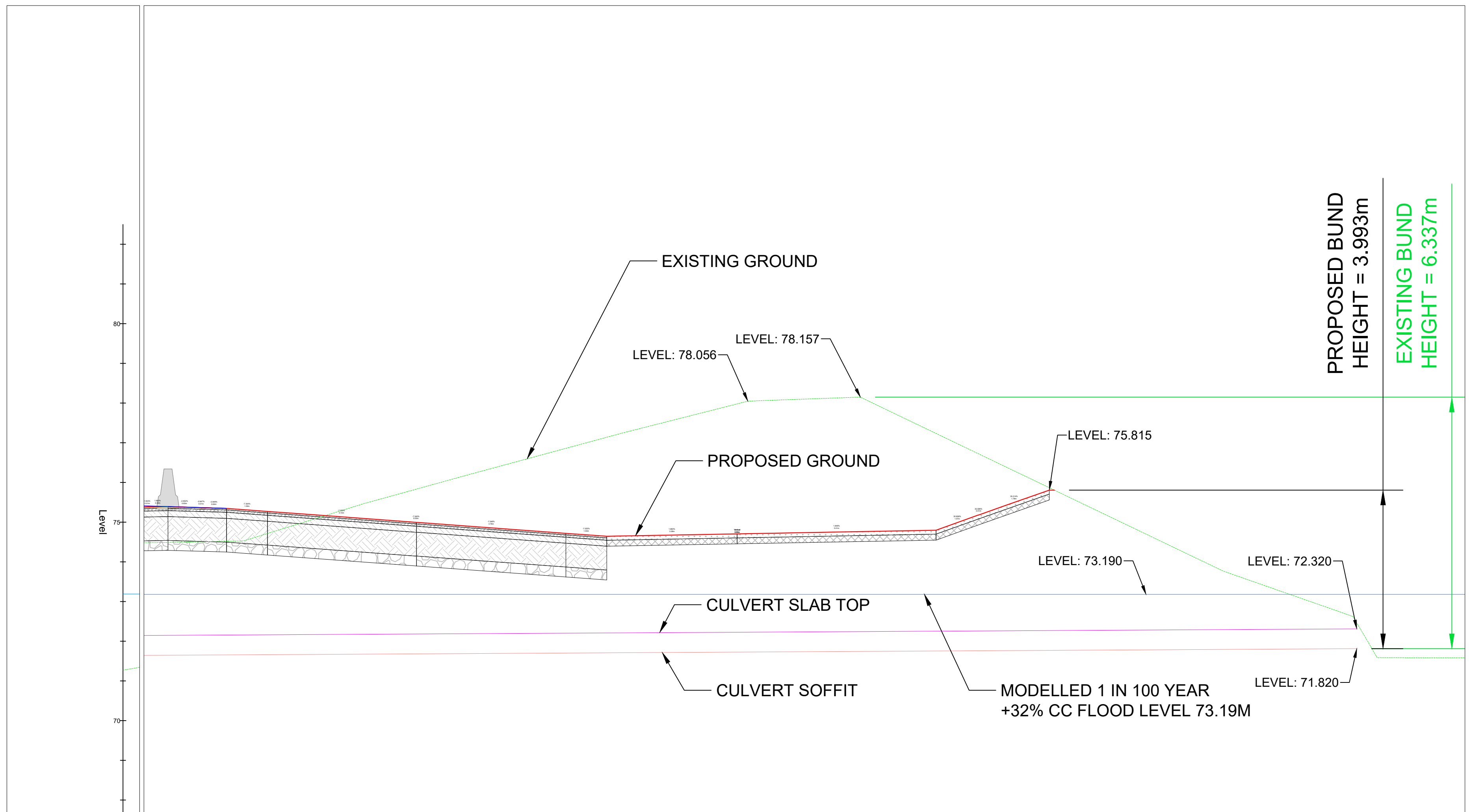
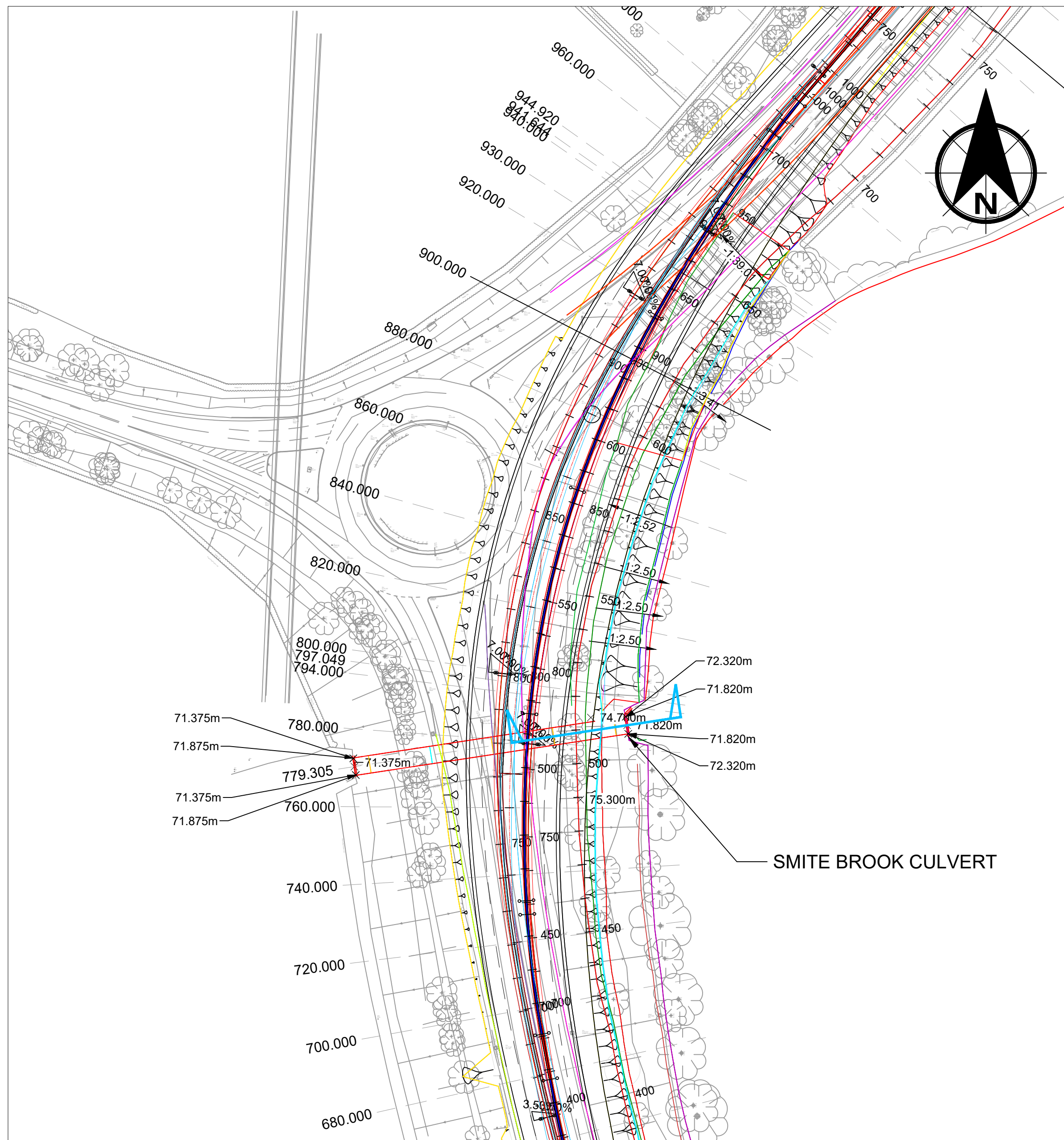
Reference	Text from Local Impact Report	Applicant's Response																																																															
	<p>The development permitted by that planning permission comprises the following quanta of floorspace:</p> <table> <tr> <th>Building/Use</th><th>Breakdown (if required)</th><th>Gross Internal Area (sqm)</th></tr> <tr> <td>Office Headquarters and Supplier Hub</td><td></td><td>17,911 m²</td></tr> <tr> <td>Concept Retail R & D</td><td>(not including F&B, Convenience or Nursery floorspace)</td><td>20,755 m²</td></tr> <tr> <td>Nursery</td><td>Not inclusive of 105 m² external play space</td><td>547 m²</td></tr> <tr> <td>Learning and Development (L&D)</td><td>Auditorium (750 seats)</td><td>823 m²</td></tr> <tr> <td></td><td>Services/Back of House/Plant</td><td>591 m²</td></tr> <tr> <td></td><td>Training Rooms (10)</td><td>1,223 m²</td></tr> <tr> <td></td><td>Cafe/Foyer</td><td>541 m²</td></tr> <tr> <td>L&D Total</td><td></td><td>3,179 m²</td></tr> <tr> <td>Hotel</td><td>100 Rooms</td><td>4,311 m²</td></tr> <tr> <td>Food and Beverage</td><td></td><td>592 m²</td></tr> <tr> <td>Concept Leisure R & D</td><td>Gym</td><td>1,893 m²</td></tr> <tr> <td></td><td>Studios</td><td>388 m²</td></tr> <tr> <td></td><td>Swimming Pool 25m x 13m (6 lane)</td><td>585 m²</td></tr> <tr> <td></td><td>Flexible Fitness Studio/Sports Hall (34.5 x 21.3m - 4 padel courts)</td><td>824 m²</td></tr> <tr> <td></td><td>Services/Back of House/Plant</td><td>709 m²</td></tr> <tr> <td></td><td>Changing Rooms (wet & dry)</td><td>653 m²</td></tr> <tr> <td>Concept Leisure R & D Total</td><td></td><td>5,054 m²</td></tr> <tr> <td>Mobility Hub</td><td></td><td>190 m²</td></tr> <tr> <td>Convenience Retail</td><td></td><td>369 m²</td></tr> <tr> <td>Group Accommodation</td><td>80 units and shared common room space</td><td>2,309 m²</td></tr> </table>	Building/Use	Breakdown (if required)	Gross Internal Area (sqm)	Office Headquarters and Supplier Hub		17,911 m ²	Concept Retail R & D	(not including F&B, Convenience or Nursery floorspace)	20,755 m ²	Nursery	Not inclusive of 105 m ² external play space	547 m ²	Learning and Development (L&D)	Auditorium (750 seats)	823 m ²		Services/Back of House/Plant	591 m ²		Training Rooms (10)	1,223 m ²		Cafe/Foyer	541 m ²	L&D Total		3,179 m ²	Hotel	100 Rooms	4,311 m ²	Food and Beverage		592 m ²	Concept Leisure R & D	Gym	1,893 m ²		Studios	388 m ²		Swimming Pool 25m x 13m (6 lane)	585 m ²		Flexible Fitness Studio/Sports Hall (34.5 x 21.3m - 4 padel courts)	824 m ²		Services/Back of House/Plant	709 m ²		Changing Rooms (wet & dry)	653 m ²	Concept Leisure R & D Total		5,054 m ²	Mobility Hub		190 m ²	Convenience Retail		369 m ²	Group Accommodation	80 units and shared common room space	2,309 m ²	
Building/Use	Breakdown (if required)	Gross Internal Area (sqm)																																																															
Office Headquarters and Supplier Hub		17,911 m ²																																																															
Concept Retail R & D	(not including F&B, Convenience or Nursery floorspace)	20,755 m ²																																																															
Nursery	Not inclusive of 105 m ² external play space	547 m ²																																																															
Learning and Development (L&D)	Auditorium (750 seats)	823 m ²																																																															
	Services/Back of House/Plant	591 m ²																																																															
	Training Rooms (10)	1,223 m ²																																																															
	Cafe/Foyer	541 m ²																																																															
L&D Total		3,179 m ²																																																															
Hotel	100 Rooms	4,311 m ²																																																															
Food and Beverage		592 m ²																																																															
Concept Leisure R & D	Gym	1,893 m ²																																																															
	Studios	388 m ²																																																															
	Swimming Pool 25m x 13m (6 lane)	585 m ²																																																															
	Flexible Fitness Studio/Sports Hall (34.5 x 21.3m - 4 padel courts)	824 m ²																																																															
	Services/Back of House/Plant	709 m ²																																																															
	Changing Rooms (wet & dry)	653 m ²																																																															
Concept Leisure R & D Total		5,054 m ²																																																															
Mobility Hub		190 m ²																																																															
Convenience Retail		369 m ²																																																															
Group Accommodation	80 units and shared common room space	2,309 m ²																																																															

Reference	Text from Local Impact Report			Applicant's Response																																																									
	<table><tr><td>Logistics Buildings</td><td>Logistics Building 1</td><td>100,382 m²</td></tr><tr><td></td><td>Logistics Building 2</td><td>53,890 m²</td></tr><tr><td></td><td>Logistics Building 3</td><td>23,228 m²</td></tr><tr><td></td><td>Logistics Building 4</td><td>23,264 m²</td></tr><tr><td></td><td>Logistics Building 5</td><td>50,180 m²</td></tr><tr><td>Logistics' Buildings Total</td><td></td><td>250,944 m²</td></tr><tr><td></td><td>Logistics Building 1 Office</td><td>11,953 m²</td></tr><tr><td></td><td>Logistics Building 2 Office</td><td>4,125 m²</td></tr><tr><td></td><td>Logistics Building 3 Office</td><td>1,743 m²</td></tr><tr><td></td><td>Logistics Building 4 Office</td><td>1,747 m²</td></tr><tr><td></td><td>Logistics Building 5 Office</td><td>3,876 m²</td></tr><tr><td>Logistics' Buildings Offices Total</td><td></td><td>23,444 m²</td></tr><tr><td>Service/Back of House/Plant Buildings</td><td>Including Vehicle Maintenance Unit & gatehouses</td><td>943 m²</td></tr><tr><td>Multi Storey Car Parks</td><td>MSCP HQ</td><td>16,568 m²</td></tr><tr><td></td><td>MSCP East</td><td>20,526 m²</td></tr><tr><td></td><td>MSCP West</td><td>16,333 m²</td></tr><tr><td></td><td>MSCP Concept Retail R & D</td><td>11,881 m²</td></tr><tr><td>Multi Storey Car Parks Total</td><td></td><td>65,344 m²</td></tr><tr><td>TOTAL</td><td></td><td>395,856 m²</td></tr></table>			Logistics Buildings	Logistics Building 1	100,382 m ²		Logistics Building 2	53,890 m ²		Logistics Building 3	23,228 m ²		Logistics Building 4	23,264 m ²		Logistics Building 5	50,180 m ²	Logistics' Buildings Total		250,944 m ²		Logistics Building 1 Office	11,953 m ²		Logistics Building 2 Office	4,125 m ²		Logistics Building 3 Office	1,743 m ²		Logistics Building 4 Office	1,747 m ²		Logistics Building 5 Office	3,876 m ²	Logistics' Buildings Offices Total		23,444 m ²	Service/Back of House/Plant Buildings	Including Vehicle Maintenance Unit & gatehouses	943 m ²	Multi Storey Car Parks	MSCP HQ	16,568 m ²		MSCP East	20,526 m ²		MSCP West	16,333 m ²		MSCP Concept Retail R & D	11,881 m ²	Multi Storey Car Parks Total		65,344 m ²	TOTAL		395,856 m ²	
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	<p>Planning condition 97 states:</p> <p>CONDITION 97:</p> <p>No part of the development hereby approved shall be occupied until the improvement works at the A46 Walsgrave Junction (B4082 / Coventry Eastern Bypass (A46) roundabout) are completed and fully operational (the A46 Walsgrave junction improvement is included within the modelling assessment - detailed at https://nationalhighways.co.uk/our-roads/west-midlands/a46-coventryjunctions-upgrade/). REASON: In the interests of highway safety and traffic flows.</p>																																																												

Reference	Text from Local Impact Report	Applicant's Response
	<p>Therefore, if this DCO is not progressed then there would be a significant local economic impact as R23/1027 would not be able to be occupied and therefore the benefits assessed as part of the planning application would not be able to be realised.</p> <p>Appendix: Crowner Fields Farm site location plan (not to scale)</p> 	
4	<p>Finally, we would also highlight that a Regulation 18 “Preferred Options” public consultation on a new Local Plan for Rugby Borough</p>	<p>The Case for the Scheme (REP1-012) was updated at Deadline 1 of the examination</p>

Reference	Text from Local Impact Report	Applicant's Response
	<p>covering the period 2024-2045 took place between 24 March 2025 and 19 May 2025. The consultation document: https://rugby.gov.uk/w/local-plan-review-preferred-options-public-consultation-document proposes two new allocations for employment development on the eastern edge of Coventry close to the A46. Those proposals are at North of Ansty Park for circa 75,000m² of employment floorspace and at Prologis Park West and Mountpark, Ryton-on-Dunsmore for 350,000m² of employment floorspace.</p> <p>Neither scheme is within 1km of the DCO proposal, nor should those schemes be regarded as commitments. Changes to the plan may be made prior to the Regulation 19 consultation timetabled for January 2026. Transport modelling of those potential developments, and other alternative potential sites, is progressing as part of the strategic transport assessment of the local plan.</p> <p>It is not considered that proposed allocations in the Regulation 18 consultation document can be given weight in decision-making. Nonetheless we wish to make the examining authority aware of this as relevant background.</p>	<p>to include the most recent updates to the Local Plan - Regulation 18 "Preferred Options" public consultation. It also notes that the current proposed allocations in the Regulation 18 consultation document can be given weight in decision-making at this time.</p>

Appendix 1 - Section Through Centre of Smite Brook Culvert



SECTION THROUGH CENTRE OF SMITE BROOK CULVERT
(A46 MAINLINE CHAINAGE: 779.305m)