

Date: 24 June 2025  
Our ref: 515861  
Your ref: TR010066



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**BY EMAIL ONLY**

Dear Inspector,

**NSIP Reference Name / Code: A46 Coventry Junctions (Walsgrave) / TR010066**

**Natural England's response to the Examining Authority's first written questions.**

**Examining Authority's submission deadline 3 with a date of 24 June 2025**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

For any further advice on this consultation please contact the case officer [REDACTED] and copy to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

[REDACTED]

[REDACTED]

Senior Adviser  
Sustainable Development  
West Midlands Area Team

## Natural England's response to the Examining Authority's (ExA's) first written questions

Table A: Natural England's response to Examiner's first written questions			
ExA question ref	Question addressed to	Question	Answer
<b>Air Quality</b>			
AQ.1.2	Natural England, Coventry City Council and Rugby Borough Council	ES Ch.5 [APP-027] Paragraph 5.13.9 Do you agree with the conclusion "there will be no significant effects in terms of air quality on human and ecological receptors as a result of the Scheme." If not explain the points of difference with this conclusion	<p>Natural England has advised that currently based on the assessment provided (APP-090) additional clarification was required regarding potential impacts of Air Quality on Combe Pool SSSI and Herald Way Marsh SSSI.</p> <p>Natural England understand that additional clarification from the Applicant, will be provided via an Air Quality Appendix which will fully address this matter.</p> <p>Clarification of the notified features of the SSSIs and sensitivity of these features to air quality impacts will provide evidence to conclude any likely significant effect for this impact pathway,</p> <p>At present it is not clear how assessment conclusions have been evidenced.</p> <p>We are not able to provide advice in regard to human receptors as this is not within our remit or expertise.</p>
AQ.1.3	Natural England, Coventry City Council, Rugby Borough Council and	Applicant's response to Rule 9 [PD1-016] – Paragraph 7.1.7 The Applicant's conclusion concerning the impact of the "Interim Planning Guidance on the consideration of the Environment Act PM2.5 targets in planning decisions" - published 4 October 2024 states; in conclusion that "if the interim planning guidance had been in place at the	The PM 2.5 targets set out in the Interim Planning Guidance are for human health not ecological receptors as PM 2.5 is a human health issue. This matter falls outside of Natural England's remit and therefore it would not be appropriate for us to comment.

Table A: Natural England's response to Examiner's first written questions			
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	any other Interested Parties	time of the original Scheme air quality assessment, there would be no material changes to the assessment outcomes." Do you agree? If not explain the points of difference with this conclusion	
<b>Alternatives</b>			
AS.1.1	Environment Agency, Historic England, Natural England, Coventry City Council, Warwickshire County Council and Rugby Borough Council	ES Ch.3 [APP-025] – Assessment of Alternatives Do you agree with the assessments of alternatives set out in this chapter and the option selected for this application? If not set out any areas of disagreement.	Yes, we agree with the Assessment of Alternatives.
<b>Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))</b>			
BY.1.2	Natural England Environment Agency Coventry City Council Warwickshire County Council	<p>Assessment and mitigation Do you agree with the applicant's conclusions regarding the likely significant effects on biodiversity arising from the Proposed Development? If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions. (Refer to ES Section 8.11 Assessment of likely significant effects (both during construction and operation) [APP-030]).</p> <p>Do you consider the Applicants approach to the assessment and mitigation of biodiversity and nature</p>	<p>Assessment and mitigation. We agree with some parts of the Applicant's conclusions and currently disagree with other parts of the conclusion. See explanation below:</p> <p><b>HRA- agree</b> We agree that there are no likely significant effects on Ensor's Pool Special Area of Conservation and River Mease Special Area of Conservation. This is due to the distance of the proposal from the sites distance (10.1km and 29.5km respectively). There is no hydrological or hydrogeological linkage, and neither site is notified for bats.</p>

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		conservation to comply with the relevant parts of the National Networks National Policy Statement?	<p><b>Combe Pool SSSI</b></p> <ul style="list-style-type: none"> <li>• <u>Habitat loss- agree.</u> We are satisfied that the works to facilitate the replacement boundary fencing and the measures proposed to minimise/ mitigate/ compensate habitat loss will mean that impacts will not be significant.</li> <li>• <u>Invasive Species- agree</u> We are satisfied that the measures proposed to mitigate the risk of spread of Rhododendron and Himalayan Balsam will mean that impacts will not be significant.</li> <li>• <u>AQ (dust)- agree</u> We are satisfied with the assessment (APP-027) and mitigation proposed (APP-109 &amp; APP-110) and agree that there will be no likely significant effects from dust.</li> <li>• <u>Water quality- disagree.</u> Currently, there is insufficient information and detail provided to enable us to have confidence in the efficacy of the proposed mitigation and in the absence of additional detail we cannot currently agree that the impacts will not be significant.</li> <li>• <u>Noise- disagree</u> Currently, their assessment lacks sufficient information regarding evidence-based reasoning. Natural England advise that there is insufficient information on noise contour maps for affected areas and how noise may affect notified features. This information will help evidence and inform the mitigation measures. It is not clear how cumulative impacts have been assessed.</li> </ul>

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			<ul style="list-style-type: none"> <li>• <u>Lighting-disagree</u> Currently further clarification is required on measures to prevent impacts on the SSSI.</li> </ul> <p><b>Combe Pool SSSI and Herald Way Marsh SSSI</b></p> <p><u>AQ (NOx, NH3, N dep) -disagree.</u> Natural England has advised that currently based on the assessment provided (APP-090) additional clarification was required regarding potential impacts of Air Quality on Combe Pool and Herald Way Marsh SSSI.</p> <p>Natural England understand that additional clarification from the Applicant, will be provided via an Air Quality Appendix which will fully address this matter.</p> <p>Clarification of the notified features of the SSSIs and sensitivity of these features to air quality impacts will provide evidence to conclude any likely significant effect for this impact pathway</p> <p><b>Licensing of Protected Species</b> It is the Applicant's role to ascertain whether a mitigation license is required. Natural England has provided a Letter of no Impediment for Badgers (APP-089).</p> <p>Natural England is currently discussing bat surveying, mitigation and the potential requirement for a Bat License with the Applicant.</p> <p>We therefore advise that parts of the assessment comply with the National Networks National Policy Statement but other parts currently</p>

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			do not as there is a lack of information/assessment presented in the information provided to inform assessment conclusions.
BY.1.8	Natural England Environment Agency Coventry City Council Warwickshire County Council	<p>Management Measures. What are your views on the Outline Landscape and Ecology Management Plan (Appendix B.4, [APP-109]) regarding: (i) Ecology strategy and principles (ii) REAC Ecology (iii) Biodiversity net gain (iv) monitoring specifications. What are your views on the management measures BD1 through to BD9 set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments [APP-110]?</p> <p>Would the dDCO [REP1-002], Table 1 of the Register of Environmental Actions and Commitments [APP-110], and Appendix B.4 [APP-109] adequately secure all measures required to reduce the environmental impacts of material assets and waste?</p>	<p>Natural England is generally satisfied with the OLEMP (App-109) and management measures BD1 through to BD9 (APP-110) subject to some further clarification (see answer to BY.1.2).</p> <p>However, some of the references to sections of the REAC in section 4.5.2 of the OLEMP (APP-109), need to be revised as they either do not relate to an applicable reference i.e. G12 or do not relate to the relevant topic. Clarification is therefore required.</p> <p>It should be noted that Natural England's comments are limited to topics within our remit as set out in Advice Note 11, Annex C – Natural England and the Planning Inspectorate.</p> <p>Please see answer to question GS.1.5.</p>
DCBY.1.9	Natural England	Habitats Regulations Assessment Confirm whether you are satisfied with the conclusions of the Habitats Regulations Assessment report? (Refer to Tables 4-1 and 4-2 of Appendix 8.12 Habitats Regulations Assessment Report [APP087]).	Natural England is satisfied with the conclusions of the Habitats Regulations Assessment report (APP087).
BY.1.10	The Applicant Natural England	Habitats Regulations Assessment The Joint Nature Conservation Committee Standard Data Form (and website information) for the River Mease SAC lists the following which have not been considered within the applicants HRA report [APP-087]: Annex I habitats present as a qualifying feature (but not a primary reason for selection of this site) Water courses of plain to montane levels with the	<p>We advise that the HRA (APP-087) should list all the qualifying features set out in page 2 of the <a href="#">River Mease SAC Citation, PDF, 40.3 kB</a> and any potential impacts to the site's Conservation Objectives</p> <p>In this instance we do not consider there to be any likely significant effects on the qualifying features of the River Mease SAC. This is because the proposal site is not in or near the River Mease catchment</p>

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		<p>Ranunculus fluitantis and Callitriche Batrachion vegetation Annex II species present as a qualifying feature (but not a primary reason for site selection) • White-clawed (or Atlantic stream) crayfish • Otter</p> <p>To the applicant – Can you confirm the status of these three qualifying features in relation to the HRA report [APP-087] and why they have not been included?</p> <p>To Natural England – Can you confirm if you consider whether there is any potential for likely significant effects on these qualifying features, and if the HRA [APP-087] requires these to be included within the assessment?</p>	and is approximately 30km from the SAC. We therefore advise that there are unlikely to be impact pathways which would affect this site.
Climate			
CE.1.7	Natural England Environment Agency Coventry City Council Rugby Borough Council Warwickshire County Council	<p>Assessment and mitigation Do you agree with the applicant's conclusions regarding the likely significant effects on greenhouse gases? If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions. (Refer to ES Section 14.11 Assessment of likely significant effects (construction and operation) [APP-036]).</p> <p>Do you consider the Applicants approach to the assessment and mitigation of greenhouse gas emissions to comply with the relevant parts of the National Networks National Policy Statement?</p>	Natural England has no comment to make on these questions as they do not fall within our remit as set out in <a href="#">Advice on working with public bodies in the infrastructure planning process, Annex C: Natural England and the Planning Inspectorate.</a>
CE.1.14	Natural England Environment Agency Coventry City Council	<p>Management Measures What are your views on the Outline Carbon Management Plan (Appendix B.8, [APP-109]) regarding:</p> <ul style="list-style-type: none"> <li>- Approach</li> <li>- Carbon Management Process</li> </ul>	Natural England has no comments to make on these questions as they do not fall within our remit as set out in <a href="#">Advice on working with public bodies in the infrastructure planning process, Annex C: Natural England and the Planning Inspectorate.</a>

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ExA question ref	Question addressed to	Question	Answer
	Council Rugby Borough Council Warwickshire County Council	<p>- Monitoring and Reporting</p> <p>What are your views on the management measures C1 through to C3 (related to climate) set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments [APP-110]? What are your views on the mitigation measures to minimise the carbon emissions from construction and operation? (Refer to Section 14.10 of ES Chapter 14 [APP-036]). Would the dDCO [REP1-002], and Table 1 of the Register of Environmental Actions and Commitments [APP-110] adequately secure all measures required to reduce the environmental impacts on climate?</p>	<p>However we provide the following general guidance: Natural England would highlight that, alongside measures to reduce carbon emissions from the proposal, measures to increase carbon sequestration could also be considered. For instance, targeted tree planting, peatland restoration or other habitat creation/ restoration, where appropriate, offer substantial opportunities to capture carbon while also supporting biodiversity.</p> <p>Tree planting remains one of the few proven large-scale methods for removing carbon dioxide from the atmosphere. Natural regeneration can also be an effective approach to woodland creation in suitable areas. Further details on the carbon storage potential of specific habitats, including woodlands and peatlands, can be found in the <a href="#">Carbon Storage and Sequestration by Habitat</a> report.</p>
<b>Geology and Soils</b>			
GS.1.1	Natural England • Environment Agency • Coventry City Council • Rugby Borough Council • Warwickshire County Council	<p>Assessment and mitigation</p> <ul style="list-style-type: none"> <li>• Do you agree with the applicant's conclusions regarding the likely significant effects on geology and soils relating to human health, controlled waters and agricultural soils?</li> <li>• If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions.</li> <li>• (Refer to ES Section 9.11 Assessment of likely significant effects [APP-031]). Do you consider the Applicants approach to the assessment and mitigation of land use and land contamination and instability to comply with the relevant parts of the National Networks National Policy Statement?</li> </ul>	<p>Yes, we agree with the Applicant's conclusions regarding likely significant effects, considering the permanent loss of 11.1 ha of best and most versatile (BMV) agricultural land (Grades 1 and 3a), temporary loss of 0.4ha of BMV land (Grades 1 and 3a), and the mitigation measures proposed. However, we note that details of the ALC grades of permanent and temporary agricultural land take in table 9-13 do not match the details in Table 9-15 and section 9.11.4.</p> <p>In terms of BMV land we are satisfied with the Applicant's approach to assessment and mitigation complies with the relevant parts of the National Networks National Policy Statement.</p> <p>It should be noted that Natural England's comments are limited to topics within our remit as set out in Advice Note 11, Annex C – Natural England and the Planning Inspectorate.</p>



<b>Table A: Natural England's response to Examiner's first written questions</b>			
<b>ExA question ref</b>	<b>Question addressed to</b>	<b>Question</b>	<b>Answer</b>
GS.1.5	Natural England Environment Agency Coventry City Council Rugby Borough Council Warwickshire County Council	Management Measures What are your views on the management measures GS1 through to GS5 set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments [APP-110]? Would the dDCO [REP1-002], and Table 1 of the Register of Environmental Actions and Commitments [APP-110] adequately secure all measures required to reduce the environmental impacts of material assets and waste?	<p>We are satisfied with the management measures GS1 to GS5 (Table 1, APP-110).</p> <p>The dDCO (REP1-002) and Table 1 of the Register of Environmental Actions and Commitments (APP-110) should adequately secure all the measures required to reduce environmental impacts in terms of BMV land and soils.</p> <p>It should be noted that Natural England's comments are limited to topics within our remit as set out in Advice Note 11, Annex C – Natural England and the Planning Inspectorate.</p>

