

Date: 22 July 2025
Our ref: 518274
Your ref: TR010066



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The Planning Inspectorate
Major Applications & Plans
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BY EMAIL ONLY

Dear Inspector,

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

Natural England's response to the submissions at deadline 3

Examining Authority's submission deadline 4 with a date of 22 July 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.

Yours sincerely

[REDACTED]

[REDACTED]
Senior Adviser
Sustainable Development
West Midlands Area Team

Natural England’s response to the submissions at deadline 3

Combe Pool Site of Special Scientific Interest (SSSI)

Water quality

No further information has been provided at deadline 3 in regard to water quality impacts, however we are continuing to discuss this issue with National Highways.

Noise (Source 2.2.7 REP3-028).

The latest submissions have provided some further information on the noise impacts. Construction noise will result in noise levels above 3dB even with a 2m noise barrier (see Table 1 below) which will impact on breeding waterbirds, wintering waterbirds (including Shoveler) and woodland breeding and wintering within Combe Pool SSSI. There will be an increase in noise levels above 3dB for a portion of the SSSI and a decrease of -1.0dB or less during operation. The modelled background noise levels at the closest edge of the lake to the Order boundary in the do minimum scenario for 2028 will be 61.5dB and 64dB for 2028 if the scheme goes ahead.

Table 1: Summary of Construction impacts

Combe Pool SSSI- feature affected	Months with increase in noise levels above 3dB	Source
Breeding birds	Day March 2027, August 2027, Day March 2028, Night June 2028	Table 3 REP3-028
Wintering birds	Night September 2026, Day November 2026, Day December 2026, Day January 2027, Day February 2027, Day September 2027, Day October 2027, Night December 2027, Day February 2028	Table 4 REP3-028
Woodland breeding and wintering birds	22 months approximately	2.1.24 REP3-028

From the information provided it appears that the construction noise impacts will not be fully mitigated, and a residual impact remains. We therefore advise that the proposal should include the provision of a permanent noise barrier to mitigate for residual operational noise impacts on breeding and wintering birds.

Traffic is predicted to continue to increase over time (Source: [National road traffic projections 2022](#)) and it is likely that noise levels within the SSSI will also continue to increase for the operational stage of this road scheme. Low woodland breeding and wintering bird numbers have already been identified, which the Applicant partly attributes to the proximity of the existing road (2.1.24 REP3-028).

The effects of noise on birds includes but is not limited to the following: increased susceptibility to disturbance by other stimuli (i.e. visual), interference with or masking of acoustic signals (e.g. territorial bird song and alarm calls) affecting pair bonding and territoriality, reduced detectability of prey and predators, displacement from otherwise suitable habitat and reduced population density. Reductions in

population density due to proximity to noise¹ and possible effects on demography are well documented². There is some evidence that birds can become habituated to certain types of noise, but different species have differing sensitivities³. this does not mean that they are not being affected by the noise⁴. Habituation does not mean that birds are unaffected and they can experience physiological changes due to increased levels of stress⁴ and reduced breeding productivity⁵.

Lighting

In our Relevant and Written representations (RR-010 & PD1-018) we raised a concern regarding vegetation clearance between the road and potential to increase light disturbance impacts as a result on the notified features of Combe Pool SSSI.

As no additional information regarding lighting impacts appears to have been submitted at D3 we will continue to discuss this matter with the applicants.

In addition, we advise that the potential impacts of lighting on the Combe Hill SSSI are included in the Statement of Common Ground.

Works within Combe Pool SSSI.

The draft DCO includes works within the Combe Pool SSSI. Natural England currently require additional information in order to demonstrate the planned works can go ahead without impact to notified features. In the absence of certainty regarding methodology, we therefore are not able to advise that the project would not require assent once the DCO has been granted

Combe Pool SSSI and Herald Way Marsh SSSI

AQ (NOx, NH3, N dep)

We have reviewed the latest submissions from the National Highways on Air quality. Natural England can concur with their assessment and conclusions that there would be no significant effect on Combe

¹ Reijnen, R., Foppen, R., ter Braak, C. & Thissen, J. 1995a. The effects of car traffic on breeding bird populations in Woodland. III. Reduction of density in relation to the proximity of main roads. J. Appl. Ecol. 32, 187–202 [Link to article.](#)

² Habib, L., Bayne, E.M. & Boutin, S. 2007. Chronic industrial noise affects pairing success and age structure of ovenbirds *Seiurus aurocapilla*. J. Appl. Ecol. 44, 176–184 [Link to article.](#)

³ Wright, M.D., Goodman, P. & Cameron, T.C. 2010. Exploring behavioural responses of shorebirds to impulsive noise. Wildfowl, Volume 60 pp. 150–167. [Link to article.](#)

⁴ Fleming, W.J., Dubovsky, J.A., Collazo, J.A., Temple, E.R. & Conomy, J.T. 2001. An overview of studies to assess the effects of military aircraft training activities on waterfowl on Piney Island, North Carolina. Terra Borealis: Effects of Noise on Wildlife Conference. Conference Proceedings Happy Valley-Goose Bay, Labrador, August 22-23. 2000. No2. Institute for Environmental Monitoring and Research. [Link to article.](#)

Gill, J.A., Norris, K. & Sutherland, W.J. 2001. Why behavioural responses may not reflect the population consequences of human disturbance. Biological Conservation 97:265-268. [Link to article.](#)

⁵ Halfwerk, W., Holleman, L.J.M., Lessells, C.M. & Slabbekoorn, H. 2011. Negative impact of traffic noise on avian reproductive success. Journal Applied Ecology 48:210-219. [Link to article.](#)

Pool SSSI and Herald Way Marsh SSSI in regard to ammonia and NOx. In terms of nitrogen deposition, some of the reasoning behind the Applicant's conclusions is unconventional, however we do concur with their conclusions that there would be no significant effect on Combe Pool SSSI and Herald Way Marsh SSSI for other reasons based on our professional experience.

Licensing Protected Species

We note and welcome the amendment to include to a Protected Species Method Statement in Requirement 8 of Schedule 2 in the dDCO (REP1-002).

GCN

Based on current survey data National Highways do not consider a great crested newt (GCN) Licence necessary. However, a GCN license maybe required following additional surveys conducted as part of any routine preconstruction surveys or because of any delays to construction may change the GCN status of the site and the need for a licence will be reassessed.

Bats

Natural England have meet with and reviewed additional information provided by National Highways. We have provided advice in regard to bat surveys, mitigation and potential licence requirements. The decision as to whether a licence is required for the proposed works is wholly for the applicant to determine, not Natural England.

