

	REGULATION 29 RESPONSE TO A REPORT TO PREVENT FUTURE DEATHS THIS RESPONSE IS BEING SENT TO: The Assistant Coroner for the Coroner area of Northamptonshire, of The Guildhall, St Giles' Square, Northampton NN1 1DE in response to a 'Regulation 28 Report to Prevent Future Deaths' issued after an inquest into the death of Cody Lee Keith Stock.
1	NATIONAL HIGHWAYS I am [REDACTED] Regional Director for the Midlands, Operations Directorate, responding on behalf of National Highways Limited, Three Snowhill, Snow Hill Queensway, Birmingham, B4 6GA.
2	CORONER'S MATTERS OF CONCERN The MATTERS OF CONCERN are as follows:– a) The centralised location of these collisions suggests that there may be ongoing issues with drainage on this section of the road. b) The trigger for “renewals” appears to be narrow and restricted to “recorded flood events” and does not for instance include recorded instances of collisions due to hydroplaning. c) Despite this fatal collision having occurred in December 2025, the topographic and drainage surveys are not yet available and no works other than “minor works for overburden removal” have taken place.
3	DETAILS OF ACTION TAKEN a. Drainage on this section of road Northamptonshire Police notified National Highways of concerns around water on the carriageway at the location of the collision on 14th December 2025 as part of the National Highways Post Collision Fatal Reporting process. This process proceeds after any death on the Strategic Road Network. Records of drainage and maintenance were then reviewed and determined that no issues had been observed from routine inspections or maintenance, and the site had no recorded history of flood risk. Site inspections after the collision determined that there was an area of silt and detritus that had built up in the central reservation. Through January our drainage and highway safety teams gathered data on the location of the reported flooding. It was agreed in January 2026 that work was required to survey the drainage system for faults, remove the silt build up in the central reservation, determine if there were any unrecorded drainage features and understand the topography of the highway. Once the scope of this survey was defined on 6th February 2026 we progressed with procurement of the work. The delivery date for the surveys was governed by agreeing the detailed scope and access requirements and aligning these with other works on the Strategic Road Network to minimise the impact of coincident roadworks.

The drainage survey was undertaken on 18th May 2026 and 01st June 2026 and the results were received on 9th July 2026. This identified degradation of condition of the drainage system typical of normal ageing. These included cracked pipes, root ingress and silt build up. These are going to be fixed as part of a future drainage renewal maintenance scheme currently programmed for construction in financial year 2028/29. We also identified a partially collapsed pipe 180 metres downstream of the incident location. The drainage survey confirmed that the condition of the drainage pipework is not adversely affecting the functionality of the highway drainage system.

Above ground, we had observed silt build up within the central reservation at a crossover location. A crossover is a paved (with asphalt) section of the central reservation which could have the barrier removed to allow traffic to cross from one side of the carriageway to the other, for example to allow for contraflow of the road. This silt material was removed in May 2026. Drainage gulleys to drain the crossover were cleared of silt and proved to be operational. The alignment of the carriageway indicates that the drainage in the central reservation predominantly collects water from the crossover itself and a small amount from the eastbound carriageway and a small amount of the westbound carriageway.

Water on the carriageway may occur when the road has a relative flat spot. Roads are designed so that the water drains to the nearside or the offside. Where it is required for road layout design to provide a smooth alignment it is necessary for locations on the network to switch the direction of drainage. This creates a relative flat spot from which the drainage should disperse to either side of the carriageway. The variations in alignment of the pavement is very slight and would not be picked up on the routine visual Highways Inspections or driven mechanical surveys. This can only be detected through detailed topographical survey, of which one would only be carried out if triggered by information indicating aquaplaning events.

As a mitigating measure, we installed temporary 'Risk of flooding' warning signs at the location in January 2026. National Highways will continue to regularly review the risks at the location and whether this signage remains appropriate and adequate. The current signage will remain in place until the proposed actions set out below address improvements to the horizontal and vertical alignment or until replaced with other measures identified through risk assessment.

b. Trigger for "renewals"

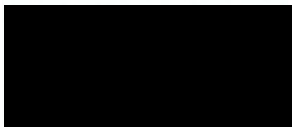
Renewals of all assets are undertaken on a prioritised basis using consistent data and principles set out in the Design Manual for Roads and Bridges (DMRB). Funding for renewal work within the Roads Investment Strategy (RIS) Period 3 (April 2026 to March 2031) is on the basis of steady state flooding and road surface condition risk. Therefore, National Highways is not fully funded to undertake works to address every risk of flooding and surface condition. A number of factors are therefore used to prioritise our renewals with the available public funding.

Drainage

	In the context of highway drainage, our renewal and maintenance activity utilises evidence of Flood Events. A Flood Event is a single incidence of flooding on or within 200 metres of a carriageway or within 500 metres of a drainage asset, at a particular location and time. Flooding on the highway is where there is an accumulation or passage of water at the ground surface where it is not normally experienced. Flood Events are grouped and parts of the network known as sub-catchments have a flood risk associated with them. This is then known as the flood risk sub-catchment. There are five grades of flood risk from A1 (Highest Risk) to D (Lowest Risk) based upon the frequency and severity. The methodology and approach followed is set out in the DMRB. The flood risk scoring is used to focus attention on the highest risk locations where work is required. Survey and inspection information is then used to determine the type of work required. National Highways uses other data, e.g. from reported incidents or observations from members of the public and our Highways Inspectors to supplement the formal programme of flood risk driven renewals. Other sites, such as the A45 Irchester, will have drainage investigated if National Highways is notified of problems. During rainfall it should be expected that a carriageway would have some surface water passing over it and into drainage systems. Flooding is where accumulations and passage of water is in excess of what may normally be expected in rainfall events. Sites with a lower priority which present issues are surveyed to establish underlying concerns, which may range from: maintenance, defects, Local Authority duties to be undertaken, or other such as climate change and capacity. <u>Pavement</u> Pavement is the asphalt surface on which vehicles run. Over time, the surface wears out due to traffic use and weather effects. National Highways examine the condition and hence determine when we need to replace (renew) the pavement using data from visual and machine-driven surveys. Work is then prioritised based upon a number of factors relating to the skidding resistance, the longitudinal profile, depth of texture, age of material, presence of cracks and other condition deterioration. A pavement renewal scheme was added to the forward programme on 28th May 2026 with a planned start date of September 2028. <u>Highways Safety Improvements</u> National Highways also undertakes improvements for highway safety. The main trigger being recorded injury collision data, based on the DfT published STATS 19 data. This data is generally two years delayed in process. National Highways reviews the recorded injury collision data annually across the Midlands section of the Strategic Road Network, for the previous available five-year period (currently 2020-2024), looking at trends at locations on the network. National Highways also attends quarterly Safety Partnership Meetings with Police Forces, local authorities and other emergency services, as well as other regular meetings with Police Forces, at which points immediate areas of concern can be raised to National Highways for investigation.
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	c. Topographic and drainage surveys Following an initial review of the incident, it was determined that a drainage and topographical survey was required to better understand the condition of the existing drainage assets and to accurately capture carriageway levels. The drainage survey, which involved, CCTV of pipework and capture of pipe invert levels, was undertaken between 18th May 2026 and 1st June 2026. The survey results were received on 9th July 2026. The results of the drainage survey are set out in section 3a. above. The topographical survey was carried out on 27th and 28th May 2026, with the results received on 17th June 2026. Levels were captured using a combination of laser scanning technology and manual GPS measurements to provide coverage of the site. The topographical survey shows that the A45 at this location is relatively flat. It has a slight longitudinal fall which suggests that ponding of surface water is unlikely, but surface water will be greater when compared to a steep section of road. The crossfall transitions from sloping towards the central reservation to the sloping towards the verge throughout this location. The transition in this case has some locations with an irregular cross fall which may increase surface water.
4	DETAILS OF FURTHER ACTION PROPOSED a. Drainage on this section of road There were no safety critical defects detected within the drainage survey undertaken. The drainage renewal scheme proposed to fix the partial collapse detected in the one carrier drainage pipe approximately 180 metres downstream, and to repair the minor faults in the drainage carrier pipes throughout this section. The pavement renewal scheme is to replace the road surface and to also build in an improved highway alignment to the carriageway centre line which will create improved fall across the carriageway pavement to direct excess water into the existing operational highway drainage system. The proposed date for these renewal works is work starting in September 2028. The length of programme is because of the time it takes to redesign the alignment of the carriageway to maximise drainage benefit, without adversely affecting the road to create other drainage problems or other safety problems due to adverse camber. National Highways is currently undertaking a review of the risks at the site to bolster the risk mitigation in the form of signage. This may include provision of advisory speed limits. b. Trigger for “renewals”

	There are no changes planned for the trigger for renewals being the flood risk sub catchments. The budgets available for RIS3 through the Department for Transport agreed for National Highways is on the basis of no change to net risk of flooding on the highway and hence the budget is aligned to locations where flooding occurs to reduce that risk. National Highways has, however, recently improved the methods and instructed approach to reporting and recording water on the carriageway so that these link in with the existing Geotechnical & Drainage Management Service (GDMS) system. c. Topographic and drainage surveys Additional topographical survey to fully capture the centre line of carriageway details to be completed on 19th October 2026 with results expected by 30th October 2026. The purpose of this further survey is to capture additional detail which will to help facilitate the detailed design of the proposed improvements to the alignment.								
5	TIMETABLE FOR ACTION <table border="1"> <thead> <tr> <th>DATE</th><th>ACTION</th></tr> </thead> <tbody> <tr> <td>19/10/26</td><td>Additional topographical survey</td></tr> <tr> <td>To start Sept 2028</td><td>Drainage renewal scheme</td></tr> <tr> <td>To start Sept2028</td><td>Pavement renewal scheme</td></tr> </tbody> </table>	DATE	ACTION	19/10/26	Additional topographical survey	To start Sept 2028	Drainage renewal scheme	To start Sept2028	Pavement renewal scheme
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6	EXPLANATION AS TO WHY NO ACTION IS PROPOSED b. Trigger for “renewals” As explained in section 3b. and 4b. above, National Highways has a robust prioritisation approach as set out in DMRB. Funding for RIS3 is only to retain steady state risk and therefore there will not be an improvement in the overall risk levels and work will continue to be prioritised. Flood risks are a key part of that trigger for renewal work, but not the only factor. Therefore, it is not envisaged any need to amend the methods for determining the work to be undertaken.								
7	SAFETY OF ROAD USERS The safety of everyone on our road network matters; it is an imperative for our business in what we set out to achieve and a core value of our organisation in how we go about it. National Highways has robust prioritisation methods based upon data that drive our programme of renewals based on the available public funding. Where we are notified of concerns that are not identified through our inspection regime, we								

	carry out investigations to validate and understand the concern raised and then consider the level of risk alongside all the other known risks. On the A45, when we were notified about HM Coroner’s concerns of aquaplaning, we acted to mitigate risks through the provision of ‘Risk of flooding’ warning signs. We progressed with appropriate surveys and investigations to understand any causal factors and have now implemented a scheme to improve the profile of the carriageway pavement and address condition issues with the drainage system. The action taken and planned on the A45 is designed to ensure we maintain the road network to ensure efficient and safe movement for all road users and should help to prevent future deaths at this location.
8	21st September 2026 Signed:   Regional Director for the Midlands