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City Services & Development Directorate
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Mr. D. Keene,
David Lock Associates,
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MK9 3BP

Your reference: UHC0001
Our reference CORS/2011/02433
16th January, 2012

Dear Sirs,

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)
Regulations 2011
University Hospital and Walsgrave Hill Farm – Scoping for Environmental Impact
Assessment**

Description of Development: Distributor road/blue light, connection and bus route from B4082 linking to the hospital; Additional ancillary highways works; two car parks providing a total of approximately 1800 car parking spaces; residential development of up to 600 dwellings including affordable housing; compensatory flood storage; noise mitigation measures; landscaping; public open space and ground remodelling and any necessary demolition.

I refer to your letter dated 15th November 2011 requesting a scoping opinion. Following consultation with neighbouring authorities, the Highways Agency, the Environment Agency and Natural England, this authority has the following comments and observations on your Scoping Report for Walsgrave Hill Farm, dated November 2011.

Development and Flood Risk

With regard to Flood Risk, section 12.0 mentions a previous hydraulic model of the Withy Brook and Sowe. However, since that model was produced we believe another model of flooding in the area has been produced by the Environment Agency.

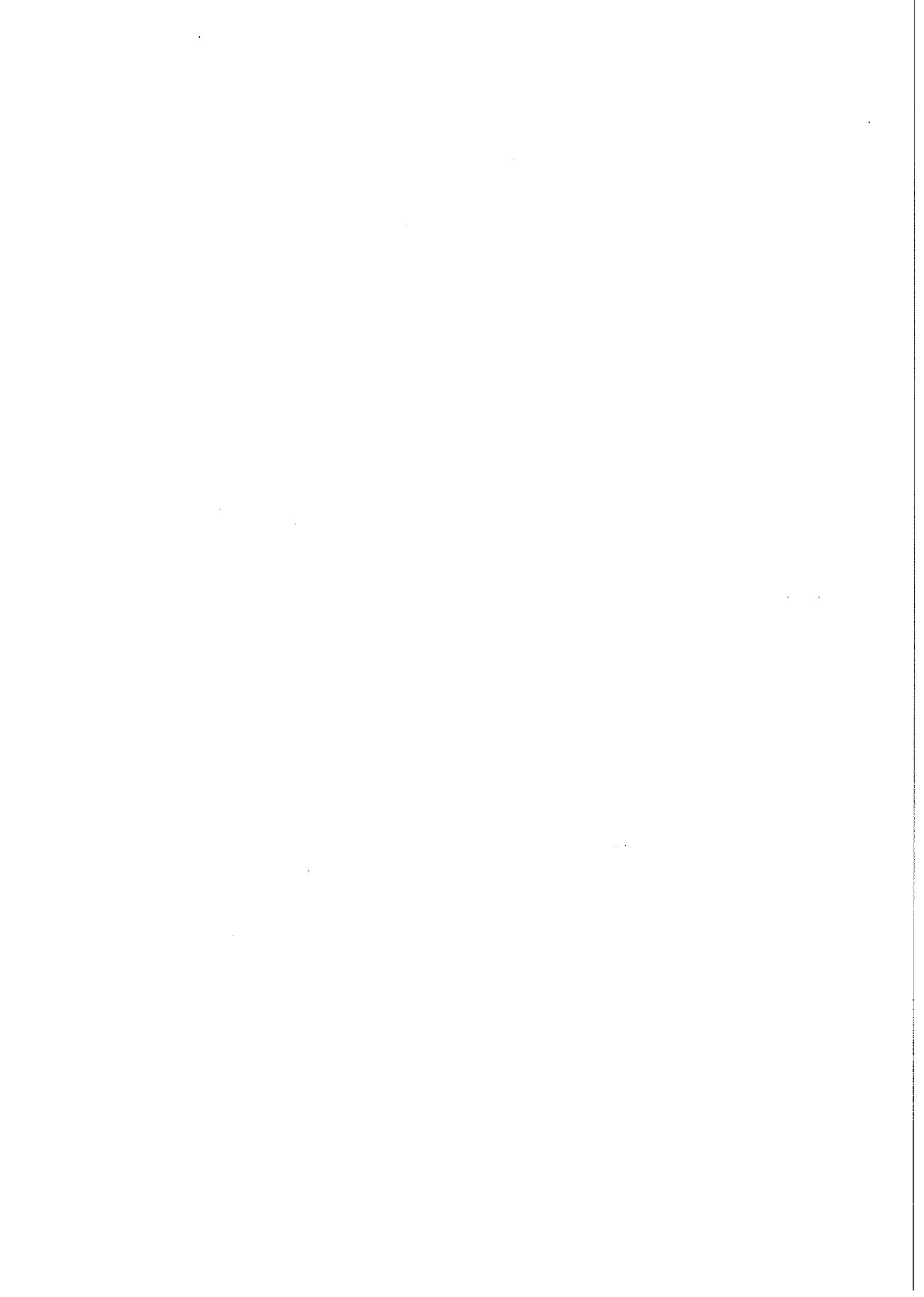
As well as this, a new vehicular access bridge through the development site to the hospital and a new hospital car park is proposed; and any new FRA report should ascertain whether these developments will have any effect on flood levels immediately adjacent to the site.

Effectively, we may need to begin from scratch with any flood modelling by modifying the original modelling and make reference to the bridge, car park and any results of modelling carried out since the original model.



INVESTOR IN PEOPLE

*Martin Yardley, Director of City Services &
Development Directorate.
Trevor Errington, Assistant Director of Planning &
Strategic Transportation.*



In common with other large schemes regarding drainage, the site should discharge at Greenfield rates for the presently undeveloped areas and with a minimum of 20% reduction in discharge from the presently developed areas. The drainage scheme should fully utilise SUDS with a minimum of two different treatment methods. These could take the form of Ponds, Swales, Infiltration Trenches, Green Roofs, Permeable Paving, Bioretention Areas or as a last resort cellular storage. As an additional measure, consideration should be given to providing oil interceptors on the highways and large car park particularly given the close proximity of the receiving watercourse.

(If you have any enquiries or problems regarding these flood risk related comments, please contact Dave Hughes at the Environment Agency on (01543) 404899.)

Waste

The scoping report has not considered whether the environmental impact of waste arising as a result of the development is within the scope of the EIA. We would expect this to be considered, not just in terms of waste arising during the construction phase but considering also the occupational phase and the decommissioning phase.

Site design should aim to minimise waste arisings and should be considered in terms of the proposal and alternative design options. If waste material is to be brought onto site for use in construction or landscaping the developer will also need to consider the environmental impacts of this.

Consideration of alternatives and design evolution in the ES, for waste, will mean considering the design of buildings and supporting infrastructure with respect to their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle-to-cradle' design) outlining the main alternatives.

The environmental impacts associated with management of this waste should be considered, including whether sufficient waste management capacity exists locally to deal with the waste. The design of communities and supporting services should encourage and enable communities to follow the waste hierarchy – reduce, re-use, recycle, recover, with landfill as the last resort.

Specifically the development should:

- * Ensure the design and layout supports sustainable waste management.
- * Take an integrated approach to waste/resource management.
- * Seek solutions that provide multiple benefits, including contributing to 'zero carbon' development.
- * Ensure adequate interior and exterior storage space and give thought to spatial issues for waste collection
- * Ensure that there is suitable provision for recycling in public spaces.
- * Aim to reduce transport-related emissions resulting from waste management (e.g. by managing waste close to the source where it was produced as far as possible and by considering routing of waste collection vehicles at the design stage).



- * Waste management should be considered alongside other spatial planning concerns such as transport, housing, economic growth, natural resources and regeneration, recognising the positive contribution that waste management can make to the development of sustainable communities.
- * Preparation of a site waste management plan at an early stage may prove helpful in identifying and mitigating against the environmental impacts associated with management of waste arisings from the development as well as identifying opportunities for waste reduction.

Water Resources

We would expect the Design and Access Statement to include details of the water use minimisation measures that will be incorporated into the development

Air quality – if dust suppression mitigation measures during construction include using water sprays then the proposed source of water needs to be mentioned. If anything other than mains water is to be used abstraction licences could be required and there is no guarantee that these could be issued, it is dependent upon water resource availability. There is no water available for licensing abstractions from groundwater; abstraction from watercourses such as the Sowe is constrained by conditions requiring abstraction to cease at times of lower flow.

Water Quality

We are satisfied that the drainage strategy, located in the flood risk section will consider foul drainage and that it will be investigated and assessed with an appropriate means of foul water disposal to be considered and agreed with the appropriate authorities. However, little consideration appears to be given to water quality issues on the development site – this is an ideal opportunity to assess whether improvements can be made to existing watercourses to enhance them for both biodiversity and water quality. An assessment should be made to show where enhancements are possible, in order to help meet the requirements of the Water Framework Directive.

Climate Change

With the possible exception of flood risk, climate change considerations (that is, the impacts of greenhouse gas emissions) do not appear to be included within the proposed scope of the EIA. However, it is Sustainability Services' opinion that both climate change mitigation measures and adaptation strategies should be covered by the Environmental Statement. We appreciate that there is a lack of published guidance on this subject, but the Institute of Environmental Management and Assessment has some relevant information on its website, which can be found at: <http://www.iema.net/eia-cc>

Noise

The potential for noise nuisance at the new dwellings is considered in the scoping report, and it is stated that a noise assessment will be conducted. For completeness, it is recommended that a noise consultant is employed to demonstrate that internal noise levels for the residential properties meet the 'Good' criteria set out in BS 8233 together with any mitigation measures that are required to achieve this. Also, it must be demonstrated that the development meets the standards in the Building Regulations 2010 Approved Document E for resistance to the passage of sound.

(See also comments on noise from the Highways Agency in respect of the A46 Trunk road.)



Air Quality

As the proposed development comprises such a large number of new dwellings, an air quality assessment will be required. The scoping report states that dispersion modelling will be used to predict future concentrations of pollutants for both the construction and operational phases of the development. For completeness, I we suggest the following:

- The assessment may be performed using a suitable dispersion model as specified in LAQM.TG(09) due to the complexity and size of the development .
- The modelled NO₂ data must be validated and corrected against monitoring data from at least 3 months (preferably 6 months) diffusion tube monitoring performed in accordance with LAQM.TG(09).
- The assessment must ascertain concentrations of NO₂ and PM₁₀ at the building facade
- As NO₂ concentrations have not been decreasing year on year as previously predicted, it is expected that a sensitivity test will be undertaken to establish the discrepancy between future-year concentrations with the previously expected emission reduction and without. Background values and emission factors used in the test will preferably be from 2010, as they will be more worst-case.
- Meteorological data used should be from Church Lawford or Coleshill weather stations and the year used should be within the last five years and should be stated.
- The assessment should show traffic data used and state its source.
- Should the assessment show that concentrations of NO₂ and/or PM₁₀ at the facades of the residential buildings exceed the air quality standards, the developer shall provide information on methods of mitigation which can be applied as planning conditions if accepted.
- The assessment should state what measures will be taken to reduce the air quality impacts from construction.
- Consideration must be given to the impact of demolition and construction works and mitigation methods included in the assessment.

(See also comments on air quality from the Highways Agency in respect of the A46 Trunk road.)

Contaminated Land

The scoping report has identified that previous site investigation work was undertaken and that there were no adverse levels of contaminants in the ground. However, there is a lack of detail of the procedure of this site investigation. Given the size of the development, the fact that stockpiles of material have been removed and that the river appears to have been straightened, it is recommended that a new site investigation be undertaken to assess current levels of contamination across the whole site, in accordance with the guidance below:

1. Site Characterisation

An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local



Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:

- human health,
- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's '*Model Procedures for the Management of Land Contamination, CLR 11*'.

2. Submission of Remediation Scheme

A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

3. Implementation of Approved Remediation Scheme

The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

4. Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 2, which is subject to the approval in writing of the Local Planning Authority.



Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 3.

Ecology

The Environmental Statement (ES) should take into account all aspects of nature conservation interest. Reference to the national, regional and local planning context should be made, where applicable, for the consideration of any impacts on nature conservation. Potential impacts on designated nature conservation sites, habitats and species subject to UK and EU legislation, UK and local BAP habitats and species, and other features of importance to biodiversity (watercourses, hedgerows etc.) need to be properly addressed.

We note that Coombe Pool SSSI is adjacent to the development site – all potential impacts upon this SSSI should be suitably quantified and assessed in the ES.

Contributing to Biodiversity

Natural England considers that the potential for the development to provide nature conservation enhancements should be clearly distinguished from measures to mitigate or compensate for harm to nature conservation interests. The ES should seek ways to enhance biodiversity and contribute to green infrastructure as part of the development. It should identify opportunities for the creation and restoration of habitats appropriate to the locality and include plans to retain existing important landscape features such as mature trees and hedgerows. In particular, we believe that the scheme should seek opportunities to implement habitat creation that contribute to local and regional biodiversity targets as set out in the local Biodiversity Action Plan (BAP).

Protected species

Protected species are a material consideration in planning matters. The ES should detail and evaluate the impacts that the proposed development might have on protected species. Surveys should be carried out for all protected species that might be affected, including bats, great crested newts, badgers, reptiles, water vole, otter, white-clawed crayfish and breeding birds. Surveys should be carried out at an appropriate time of year and any survey limitations should be noted and taken into account. Details of mitigation required to prevent or minimise adverse impacts should be provided.

Landscape

A visual and landscape character appraisal should be undertaken. Such an assessment should be based on good practice guidelines such as those produced jointly by the Landscape Institute/Institute of Environmental Assessment 2002. The appraisal should include a detailed assessment that evaluates the existing landscape in terms of its sensitivity, capacity and ability to accommodate change. Landscape Character Assessment provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving character, enhancing it or regenerating it. Hence detailed proposals for the development should reflect this work.

The relevant Countryside Character Area description should be used as baseline information for this site.

Proposals for landscape mitigation should reflect the landscape assessment. It would also be expected that consideration should be given to the sensitive design of any lighting within the



development to ensure that the "light spill" is reduced through sensitive down lighting or other means.

Rugby Borough Council has indicated that the main issue they would have would be that of the visual impact of the development from the vantage points from main vehicular routes along the A46 and also from Coombe Abbey County Park and the pedestrian footpaths which lead to it and are pleased to see that you have made reference to this. They are aware that in order to combat the noise pollution from the A46 there may be a need or a want to erect acoustic fencing to deafen the noise which would have an impact on the visual amenity so should be taken into consideration within any visual impact assessment. Ideally they would like to see some structural planting to create natural screening to support the reduction in noise which would soften the boundary to the large development site from the highways and also Country Park. They are aware that the land separating the site from the A46 is already heavily screened by vegetation and benefits from an embankment however if there are areas which would benefit from further landscaping most notably the land near the roundabout to the south east side of the site this would be encouraged.

Sustainable design

Natural England would strongly welcome the incorporation of sustainable technologies into the design of the buildings and the overall master plan. This includes the use of SUDS, green/brown roofs, grey water harvesting and applying multi-functional solutions to aspects of the master plan. On the latter point, as an example, an attenuation pond could be planted with locally sourced vegetation aimed to increase the invertebrate count, which in turn would provide a useful foraging resource for bats.

Access and Green Infrastructure

A Traffic and Access Assessment should be undertaken which identifies any existing roads, public transport, rights of way, cycle routes and pedestrian provisions in the vicinity of the development. This assessment should take account of any negative and positive impacts upon these facilities and highlight improvements that will be included as part of the development. It should also take into account the relevant Rights of Way Improvement Plan.

Opportunities to increase access linkages both within the proposed development and with the surrounding countryside and new and existing recreational facilities should be identified. Appropriate infrastructure to encourage the use of more sustainable modes of transport e.g. walking and cycling routes into and out of the site should also be identified.

We expect applications to identify and maximise opportunities to add to multifunctional green infrastructure.

Highways – Local Authority

It should be noted that the applicants have approached the LHA to discuss the transport implications of the proposals upon the Local Highway Network. In October 2010 the applicants submitted a pre-submission draft of the Transport Assessment. The LHA has provided feedback to the draft TA on a number of occasions, most recently being via email on the 19th September 2011, with a number of concerns and issues about the methodology and contents of the document. These were subsequently discussed at a meeting on the 22nd September 2011.



Based on our response the applicants have submitted an addendum to the pre-submission draft of the Transport Assessment on the 28th November 2011. At present the LHA has not provided a response to the applicants on this additional information.

We have undertaken a full assessment of the document and have specifically focused on Chapter 11 entitled 'Transport'. Our comments have been set out to each relevant chapter of the scoping document.

4.0 The Environmental Statement

It is identified that technical chapters will be provided to address each potential environmental impact. Of these a summary of baseline conditions and surveys results will be provided. In relation to the Local Highway Network it is recommended that up to date traffic surveys are undertaken at the following locations and junctions.

- A4600 – Ansty Road / B4082 – Clifford Bridge Road;
- B4082 – Clifford Bridge Road / Belgrave Road;
- B4082 – Sowe Link Road / B4082 – Clifford Bridge Road;
- A46(T) / B4082 – Sowe Link Road; and
- B4082 Clifford Bridge Road / Hospital Access.

Additionally, queue surveys should be undertaken at the identified junctions to ascertain the current levels of delay at these junctions. Vehicles using these junctions will release further pollutants into the environment whilst they are queuing. Therefore an assessment should also take into consideration the potential for existing levels of emissions to be exacerbated by development traffic, therefore increasing the levels of queuing and delay at these junctions.

11.0 Transport

The assessment and review of the transport aspects will be undertaken by Royal Haskoning UK (RHUK) Limited.

Based on our review of the EIA Scoping Note the following additional items should also be considered;

- The existing or revised Hospital Travel Plan; and
- Parking Strategy for the Hospital.

In a cautionary note, the LHA has a number of concerns about the creditability of an EIA being prepared at this time whilst a large number of uncertainties remain in relation to the transport impact of the proposed development. At present the applicants have not provided a sufficient level of justification or clarification on a number of issues and concerns raised by the LHA in relation to the Pre-Submission Transport Assessment. Therefore any assessment for the EIA should be undertaken independently from the Transport Assessment, but reference to the document would be expected.

Highways - Highways Agency



The HA is responsible, on behalf of the Secretary of State for Transport, for the management and operation of a safe and efficient strategic road network in England. The A46(T) in the vicinity of Walsgrave Hospital forms part of the strategic road network.

Location of the development

The location of the development is noted, however, the status of the Coventry Core Strategy requires updating in the light of progress towards a new strategy. In terms of the access issues discussed in this section the HA reiterates its previously stated position that a direct access from the A46(T) into the site is not acceptable in both policy and safety engineering terms.

Transport

The HA recognises the commitment to provide a Transport Assessment (TA). The scoping report notes that the TA will need to be revised as in the time since the previous draft TA was produced traffic flows etc may have substantially changed.

The discussions referred in paragraph 11.04 over a revised TA should be expanded to include the HA due to the presence of the A46(T).

The HA will require the traffic impact on the A46(T) and the A46(T) / B4082 Sowe Link Road junction to be assessed; this should be explicitly referred to in the Environment Statement and TA. The Environmental Statement (and TA) should recognise the recently announced Department for Transport commitment to the Toll Bar End A45(T) / A46(T) major junction improvement scheme. The developer should undertake in the Environment Statement a review the environmental performance of the existing Walsgrave Hospital Travel Plan as this will provide the benchmark for analysis of the trip reductions proposed in the new TA and Travel Plan.

Socio-economic

As a number of the socio-economic effects identified for assessment rely on transportation for access the impact of transport provision should be explicitly recorded as a consideration in this section of the Environmental Statement.

Air quality

The proposed development will potentially affect air quality on the A46(T) as traffic volume associated with the site will increase. A Citywide Air Quality Management Areas (AQMA) includes the development site.

The Environmental Statement should include an air quality assessment to address the potential impact of an increase in traffic volume upon air quality. In the interest of the HA, specific reference to air quality on the A46(T) must be included.

As the development site is within an AQMA, the air quality assessment must include any necessary mitigation measures to protect future sensitive receptors on the development site from poor air quality emanating from traffic on the A46(T).

Noise

The A46(T) may see increased noise levels as a result of an increase in traffic generated by the site. Increased noise levels may impact negatively upon existing sensitive receptors in the vicinity, and also upon proposed sensitive receptors at the site.

The Environmental Statement should include a noise assessment to assess the impact of noise generated by increased traffic associated with the development upon both existing, and



proposed sensitive receptors. It should recommend noise mitigation measures where appropriate. In the interest of the HA, specific reference to the A46(T) must be included.

I am enclosing copies of the responses received from statutory bodies for your information.

Yours faithfully,



Tracy Darke,
Group Manager - Planning and Building Control.



INVESTOR IN PEOPLE

*Martin Yardley, Director of City Services &
Development Directorate.
Trevor Errington, Assistant Director of Planning,
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