Dear Sir/Madam,

PROPOSED DEMOLITION OF BUILDINGS AT NATIONAL GRID, ABBOTTS LANE, COVENTRY: REQUEST FOR AN ENVIRONMENTAL IMPACT ASSESSMENT SCREENING OPINION.

WYG Planning & Environment is acting on behalf of National Grid Property Holdings ("NG") on proposals to demolish offices, a workshop and storage buildings at National Grid, Abbots Lane, Coventry.

Following court case SAVE Britain’s Heritage v SSCLG in early 2011, the DLG issued on the 31st March 2011 a guidance note on demolition, explaining that it constitutes development and as such that demolition works come within the scope of the EIA Directive. The Chief Planning Officer advised that: "where demolition works are likely to have significant effects on the environment the local planning authority must issue a screening opinion on whether an environmental assessment is required."

We hereby submit a request for an EIA Screening Opinion in respect of demolition proposals at Abbots Lane, Coventry.

The Proposed Development
The site at Abbots Lane accommodates office buildings, a former social club, workshops and garages associated with former gas manufacture, production and storage on site by National Grid. The former garages and workshops on site located within the north-westery and northerly site area are now predominantly vacant with one workshop still being used for storage purposes. The offices within the central site area and former social club building in the northerly site area are currently occupied however are to be vacated by July 2012. Enclosed drawing number 103 provides information on the history of the site and the associated gas storage and manufacture processes since the 1820’s. Aside from the aforementioned buildings, the site also comprises hardstanding with some mature trees and small areas of landscaping.

As part of our client's ongoing business model, and with the scale of works at Abbots Lane to completely cease by July 2012, the site is soon to be surplus to National Grid’s requirements. As such, subject to demolition and appropriate remediation, NG intends to dispose of the site in 2013.

The extent of the demolition proposed is shown on the attached plan (Drawing Number 01) and comprises the demolition of the workshops, garages, stores, social club, and offices on site (highlighted in grey); the total floor area of the buildings to be demolished is 4,548 square metres. The remainder of the site will be cleared to match existing gradient and topography of the site (sloping gently upwards from the north east...
corner to south west), with the exception of internal retaining walls. Due to the previous use of the site, site remediation is required; this will take place after the buildings on site have been demolished.

Those buildings (x3) surrounded by the red line boundaries on Drawing 01 (an active telecommunications mast, operated by Arqiva, and two live Governor Houses) are not to be demolished and do not form part of this Screening Opinion request. The Governor Houses are the only areas on site housing operational gas plants.

The masonry retaining wall surrounding the site is to remain. Part of the northerly site boundary however comprises a brick wall associated with an existing building (former workshops extending south from the from the northern site boundary). It is proposed that the top of the brick boundary wall associated with the building is removed to a height in line with the existing adjacent walls/site boundaries (approximately 2.5-3 metres). The boundary wall is to be left in a safe and structurally sound condition and topped with appropriate weather-proof coping stones.

All buildings on site are currently vacant with the exception of the offices within the central site area and the former social club building (currently also used as offices) which are to be vacated by July 2012. These offices are currently being used by NG staff for office based purposes and not site specific tasks. The workshops to the north of the site are mainly disused with the exception of a small area which is currently used for storage by NG, again this practice will cease this summer. Please see Drawing 102 for the current site status.

The demolition programme is scheduled to take 1-2 months. The start date is to be confirmed, however it is considered likely to commence no earlier than September 2012. The sequence of demolition of buildings on site is yet to be determined, but will be dependant on service Isolations; preparation time, as well as taking into consideration time to remove internal fittings.

The site is not allocated on the adopted Coventry Development Plan (2001), an extract of which is attached to this screening request. The site lies adjacent to the Nauls Mill Conservation Area and Coventry City Boundary, to the north west of the city centre. The site covers an area of 2.26 hectares with the existing buildings on site covering an area of approximately 4,648 square metres.

The site is surrounded by a mix of uses; to the immediate north of the site is a Fire Fighting Training Centre, residential properties and the Nauls Mill Conservation Area. This Conservation Area extends to the west and south of the site where further residential properties, Grade II Listed St Osburg Church and a primary school (St Osburg's RC Primary) are located. The south and east of the site are bound by the Coventry Ring Road, which also marks the Coventry City Boundary.

**The EIA Regulations**

The proposals do not fall within any of the categories of development set out at Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011 ("the EIA Regulations") and are therefore not automatically EIA development.

The Court of Appeal judgment delivered on 25th March 2011 decided that demolition constitutes a project under the terms of the EU Environmental Impact Assessment Directive after allowing SAVE Britain's Heritage's Judicial review against the proposed demolition of the former Mitchell's Brewery site in Lancaster (in the case of SAVE Britain's Heritage v SSCLG). The effect is that where demolition works are likely to have significant effects on the environment, the local planning authority must issue a screening opinion on whether environmental impact assessment is required.
In these circumstances therefore, we have considered the 2011 Regulations, Circular 02/99 and the advice from the Chief Planning Officer in assessing whether an EIA would be required for the proposed demolition at Abbots Lane. We refer to paragraph 33 of Circular 02/99 which suggests that formal environmental impact assessment will be required in “three main types of cases:

a) for major development which are of more than local importance;
b) for development which are proposed for particularly environmental sensitive or vulnerable locations; and
c) for development with unusually complex and potentially hazardous environmental effects”.

The circular goes on to emphasise that the basic ‘test’ for the need for an EIA in any particular case is the likelihood of significant effects on the environment.

Dealing with each of these in turn, we make the following comment:

**Major development of more than local importance** – due to the level of floorspace to be demolished, in Development Control terms, the proposals would be classed as major development. However WYG is of the opinion that the demolition on site would have no more than a localised environmental impact, we do not therefore consider that the development proposals are of more than local importance.

**Development in Environmentally sensitive locations** – those areas considered to be environmentally sensitive are defined at Schedule 3 of the Regulations (Part 2 of Annex B of the Circular). As confirmed by the Coventry Development Plan Proposals Map (2001) and attached correspondence from the TPO officer, Mr R Penlington (dated 28th May 2012), it is considered that there are no sensitive environmental receptors on the site. The TPO officer notes however that boundary trees would be advised for retention; there are no plans to remove any boundary trees as part of the demolition works.

A search on the government website www.magic.gov.uk on the 23rd May 2012 has established that none of the following lie within 1 kilometre of the site:
- Local Nature Reserves
- Ramsar Sites
- Special Areas of Conservation
- Sites of Special Scientific Interest
- National Parks
- World Heritage Sites.

The Grade II registered garden (Lady Herbert’s Garden) lies approximately 550 metres from the site; it is not considered that this public garden will be adversely affected by the proposals on a temporary or permanent basis. The Nauls Mill Conservation Area surrounds the north, west and south boundaries of the site where the Grade II Listed Building (St Osburg’s Church) can also be found. It is the intention, as previously detailed, to retain the boundary walls and mature trees and vegetation on these site boundaries, as such the setting of the Listed Building and the Conservation Area will not be adversely compromised, further there will be no physical impact on these features.

**Development with particularly complex and potentially hazardous effects** – paragraph 41 of Circular 02/99 refers to development which could have ‘complex, long-term or irreversible impacts’. The proposed demolition works have the potential to increase the risks associated by land contamination in the short term as there will be an overall increase in areas of soft ground allowing rainwater to infiltrate in to the ground and mobilise contaminants from the unsaturated zone. The risks will be mitigated by the requirement to leave building floor slabs in-situ which will only be removed as part of the subsequent remediation works. As such there is a low long – term risk of ground water contamination arising from the...
proposed demolition, reducing the likelihood of complex, long-term or irreversible effects resulting from the development. It should be noted that the demolition of buildings at the Abbots Lane will enable a comprehensive site-wide remediation. This will have a positive environmental effect in the long term.

In considering whether an EIA is required to support the proposals to demolish buildings at Abbots Lane, a clear distinction has been made between the environmental impact of the development (in this case demolition) and the environmental impact of National Grid operations ceasing on site. This has helped establish whether there are any possible “complex, long-term or irreversible impacts” arising from the proposed demolition and the subsequent ceasing of operations at Abbots Lane.

The table below outlines the potential environmental impacts and their nature:

<table>
<thead>
<tr>
<th>Impact</th>
<th>Direct</th>
<th>Indirect</th>
<th>Permanent</th>
<th>Temporary</th>
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</thead>
<tbody>
<tr>
<td>HGV Traffic Movement (to move demolition material off site)</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
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<tr>
<td>Waste Material (Potentially Contaminated)</td>
<td>✓</td>
<td></td>
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<td>✓</td>
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<tr>
<td>Moving Materials off site to be disposed of in a controlled environment</td>
<td>✓</td>
<td></td>
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<td>✓</td>
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<tr>
<td>Potential air quality considerations arising from demolition works</td>
<td>✓</td>
<td></td>
<td></td>
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<tr>
<td>Potential dust considerations arising from demolition and potential impact on receptors</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
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<tr>
<td>Potential loss of ecological habitats - unknown at this stage, however site considered of low ecological value and boundary trees to be retained</td>
<td>✓</td>
<td>✓</td>
<td>✓ (impact will be mitigated)</td>
<td></td>
</tr>
<tr>
<td>Potential impact of surface water run-off contaminating ground water</td>
<td>✓</td>
<td>✓</td>
<td></td>
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<tr>
<td>Potential change in water flows and quality to the culverted Radford Brook and subsequent potential impact on ecology in the River Sherbourne</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Whilst there is potential for some direct and indirect environmental impacts arising from the demolition, these are mainly considered to be temporary and not long term. Where potential effects are considered to have permanent impacts, it is anticipated that mitigation measures will be implemented to considerably reduce, and where possible, negate this impact.

Further it is considered that the potential environmental effects as set out above can be satisfactorily addressed through the following technical reports without the need for a formal EIA:

- Planning Statement
- Design and Access Statement
- Location Plans and Scheme Proposals
- Geo-environmental Desk Study and Ground Investigation Reports
- Drainage Assessment
- Transport Statement
- Noise Assessment
- Phase 1 Habitat Desk Study (further studies if necessary)
Conclusion

We seek the Council’s confirmation as to whether this development requires an Environmental Impact Assessment. The information and comments given in this letter are intended to assist you in reaching a formal Screening Opinion on behalf of Coventry City Council and we look forward to receiving your comments.

Please do not hesitate to contact me should you wish to discuss anything in more detail or require any further information.

Yours sincerely,

[Signature]

Liz Wells
Town Planner
For and on behalf of WYG

Encs  WYG Drawing 01 – Constraints Plan
       PB Drawing 102 – Current Site Status
       PB Drawing 103 – Site History
       Coventry Council Proposals Map Extract
       Correspondence from TPO Officer

Cc    K Johnston – National Grid
      K Wear – National Grid.