Dear Nigel,

Coventry Station Masterplan
Screening – Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (As Amended)

As you are aware, Network Rail is working with Coventry City Council, and their retained consultants SLC Rail, to create improved facilities at Coventry Station fit for continued growth in the use of the station into the 21st Century.

The current station was designed and built in 1962 and now serves 5.96m passenger movements (2013/14 figures); this was up by 321,000 on the previous 12 month period, and up from 2.35m passenger movements in 2002/03. This growth is expected to continue over the next two decades.

The Proposed Development

The overall Masterplan for the station area includes around 2.2 Hectares between the Warwick Road and Stoney Road bridges, including the whole of the existing station and associated car park and forecourt, together with an additional 0.7 Ha approximately on the West side of Warwick Road, currently used for long stay parking for rail users. A drawing showing the boundaries of the proposed development is attached for information.

The proposed overall development will include:-

- Extended canopies to the platforms to provide greater protection to rail users on the platforms,
- A second footbridge to provide the capacity required to meet current and anticipated footfall at the station, and to provide a secondary means of escape from the platforms,
- A new station building, to include a new main station entrance and ticket hall, and retail / café units to provide services to rail passengers. (The existing station building will however remain),
- A new car park for station users on up to 5 upper levels over the new station building, providing up to 556 car spaces, or an increase in total parking capacity at the station of up to 433 spaces,
- Revised drop off, bus and taxi facilities,
- Walkway linking the at grade station car park and transport interchange to the West of Warwick Road to the new station building via an underpass under Warwick Road,
• A new transport interchange off Station Road West comprising of up to eight bus stands including rail replacement services,
• New Station Square including open space around the new Western entrance and the current station building, and a
• New taxi rank and creation of a ‘kiss and drop’ zone.

This letter forms the basis of our screening request covering a description of the proposed development and the likelihood of significant effects on the environment.

Within the letter we also seek to clarify an agreed planning strategy for delivering the proposed station enhancements.

**EIA Regulations**

Development that falls within Schedule 1 of the regulations will always require an EIA. Development listed in Schedule 2 is classed as being located within a sensitive area, or one that exceeds the relevant thresholds. Not all “Schedule 2” development will require an EIA, only that development that is likely to have a significant environmental impact due to its size, location or nature.

The proposed Masterplan works fall within section 13(b) of Schedule 2 given that the changes will affect the existing railway infrastructure, as ‘Any change or extension of development or a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed’.

The applicable threshold and criteria relevant to section 13(b) are that either:

1. The development as changed or extended may have significant adverse effects on the environment, or
2. In relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded.

For the purposes of ii) above, the development described in column 1 of the table is (10)(b) Infrastructure Projects, where the corresponding thresholds in column 2 states:

1. Development includes more than 1ha of urban development which is not dwelling houses,
2. Development including more than 150 dwellings, or
3. Overall area of development exceeds 5ha.

With point (i) in mind, it is necessary to screen any such development proposals to determine, on the basis of the information provided, whether it is likely to have significant effect upon the environment by reason of matters such as its nature, size or location. The site as a whole is 2.9Ha, with the area of proposed works being approximately 1.35Ha.
Description of Development

The scheme is composed of the following works;

1. a new bus interchange, connected to the new entrance building by the pedestrian access tunnel beneath Warwick Road.

2. a new building, providing a second station entrance at the western end of the station.

3. a multi-storey car park above and adjacent to the second entrance building.

4. a new, fully enclosed and accessible, Equality Act 2010-compliant footbridge and extensions of canopies at the western end of the station.

5. highway modifications to improve access to the station and car parks.

6. enabling works including demolition of buildings and construction of temporary car parking.

The Likelihood of Significant Effects on the Environment

Schedule 3 of the Regulations sets out three criteria that must be taken into account in deciding whether Schedule 2 development is likely to have significant effects on the environment, and therefore constitute an EIA development. The relevant selection criteria are discussed below:

1. Characteristics of the development
   a) Size of development – 1.35 Ha is a significant plot but is wholly within the existing station environs and the proposed multi-storey car park is in context with other much larger buildings in the location, including those proposed at the Friargate development.
   b) Cumulation with other development – The development of the area is being planned and coordinated to ensure that cumulative impact is managed as part of both the station masterplan and that of the Friargate development.
   c) Use of natural resources – will be minimised where practical to do so in the design of the new buildings.
   d) Production of waste – once built, the development will produce little waste. Separation and recycling of any packaging or waste from the station retailers will be handled by the existing station management.
   e) Pollution and nuisances – no nuisances generated and pollution minimised. Enhanced passenger facilities and additional capacity for passenger numbers will reduce use of private car on longer journeys by attracting users to a modal change to the train; thus reducing wider pollution and nuisances.
   f) Risk of accidents, having regard in particular to substances or technologies used – no environmentally harmful substances or technologies to be used on site.

2. Location of development
   a) Existing land use – operational railway land within the station environs, occupied in part by surface level passenger parking, within a city centre.
   b) Relative abundance, quality and regenerative capacity of natural resources in the area – very limited, typical urban area.
   c) The absorption capacity of the natural environment – none relevant.
3. Characteristics of the potential impact
   a) Extent of the impact – very minimal, just related to the use of energy to power the building, visual appearance and traffic.
   b) Transfrontier nature of the impact – none.
   c) Magnitude and complexity of impact – not significant, standard urban development.
   d) Probability of impact – very low probability of significant impact, high probability of low level impact associated with normal operation.
   e) Duration, frequency and reversibility of impact – every day operation includes energy use of the building for lighting and operation of lifts and traffic impact.

Contractor's Environmental Management Plan

All contractors are required to produce an Environmental Management Plan as part of the Network Rail contract requirements. The plan outlines how the contractor will manage environmental issues through their management system and it also asks for particular information about relevant issues such as protected species, contaminated land, light pollution and so on. The Contractor’s Environmental Management Plan will provide mitigation for many of the construction impacts of the proposed development.

Noise and Vibration

The proposed development will enhance the existing railway station to provide additional capacity, including extended canopies, a second footbridge, an additional station building with new entrance and passenger facilities and a new multi-storey car parking for station passengers. No industrial processes will take place at the site and no noisy activities are proposed. Vehicle movements will be limited to private cars arriving and leaving the car park, taxi movements (broadly as existing), bus movements (broadly as existing) and deliveries as required. There will be no abnormal traffic movements associated with the operation of the site. Once complete, the enhanced station facilities will emit little or no noise, and will have a low level of traffic impact. The ambient noise of the area is dominated by noise from the existing railway line and vehicular traffic on Warwick Road, these features are between the proposed development and the closest residential areas therefore it is anticipated that any noise from the construction and operation of the site will be masked by the ambient noise. Noise and vibration issues are not considered to be significant in either construction or operation of the building.

Contaminated Land

The application site occupies approximately 1.35 hectares of previously developed land within the Station Area of the City Centre. The site is not considered to be environmentally sensitive.

Publicly available data from the British Geological Society suggests that the underlying bedrock geology at A1 consists of Allesley Member-Argillaceous Rocks, comprising of red-Brown mudstones and sandstones with subordinate lenticular conglomerates. Under A2, the bedrock geology comprises of red-brown and grey sandstones, interbedded with red and brown siltstones and mudstones. No superficial deposits are recorded within the Site boundary. However, previous ground investigations have shown that the bedrock is overlain by Made Ground, the thickness and composition of which is known to be variable across the Site, to a depth of 0.7m in some locations. A number of historic borehole records, around Coventry Station indicate the presence of Brown weakly cemented sand between approximately 0.7m and 3.8m depth, before reaching Red Marl. Grey and Red Sandstone strata, circa 1.8m thick, were evident at one borehole at depths of approximately 7m.
Whilst the Site lies within a Coal Mining Reporting Area, it does not lie within an area classified as a ‘high risk development area’. There are also no previous mine entries, abandoned mines or known/probable coal workings within the immediate vicinity.

The underlying bedrock geology and superficial deposits are classified as Principal Aquifer. The Environment Agency mapping shows that the Site lies in an area classified as a Principal Aquifer with High vulnerability. The Site is located within a Zone 3 Groundwater Source Protection Zone. However, there are no groundwater abstraction points located within 500m of the Site boundary.

There are no Contaminated Land Register Entries and Notices related to the Site. No major pollution incidents are recorded within or immediately adjacent to the Site, although there have been six recorded pollution incidents to controlled waters within 400m-500m of the Site and they have all been classified as minor incidents. There are no historic landfills which are recorded within 500m of the Site. There is considered to be possible localised soil contamination associated with previous/existing land use at the Site, in particular fuel, oil and lubricants.

**Air Quality**

During the construction phase the contractor will take appropriate steps to reduce dust and fumes from construction activities. For example dust suppression for dusty activities like demolition, switching off engines when not in use. These items will be covered in the construction contractor’s Environmental Management Plan. The operation of the enhanced station facilities does not involve any dusty activities. No significant air quality impacts are envisaged as a result of construction or operation of the car park or enhanced station facilities.

The Site is located within the Coventry City 625 Air Quality Management Area (AQMA), which has been designated due to the elevated levels of nitrogen dioxide present.

It is considered that elevated levels of pollutants (NO\textsubscript{2} and PM\textsubscript{10}) are likely associated with the A4043 (Warwick Road) which bisects the Site and the approach roads to the station, including to the south of the Site. There is also likely to be increased levels of pollutants due to emissions from the industrial/commercial premises to the north and east of the Site as well as the emissions from diesel trains using the railway lines to the south of the Site.

**Cultural Heritage**

The site is immediately adjacent to and adjoining the Grade II listed station building noted for its 1960s architecture and structural form. The proposal includes the extension of each end of the four existing platform canopies and an additional footbridge to the western end of the platforms but otherwise does not directly impact on the station building which will remain in use as the main entrance for passengers accessing the city centre by foot or the taxi rank. As discussed in the planning strategy section at the end of this letter, it is anticipated that a separate application for listed building consent will be made to include all works to the listed station building.

The site is separated by the railway from the Kenilworth Road Conservation Area which is to the south-west. The proposed development is sufficiently screened by the railway and the elevated Warwick Road bridge to have no harm on the setting or character of the designated area. Any below ground archaeology is likely to relate to the original 1830s station which was situated on the site of the proposed new car park. If deemed necessary a desk-based assessment can be carried out.
Transport

The proposed development will have limited impact on the use of Warwick Road, which is already a key gateway into the City. The closest residential area is Michaelmas Road to the south of the existing railway, and is at a sufficient distance to ensure that the proposal will not impact on the local population, either during construction or operation. During construction the contractor must produce a travel plan which will define a route for construction traffic keeping it away from residential areas and setting times for deliveries to avoid creating congestion at peak times. The proposed development will provide the necessary parking provision which is sufficient to accommodate the expected growth in passenger numbers at Coventry Station, and to compensate for any lost as a result of the development and for Friargate use. The transport impacts of the proposed development are not considered to be significant.

Landscape and Visual Effects

Visually, the proposed development will be most prominent from the Friargate redevelopment to the immediate north. The proposal has been designed as an integral part of the Friargate redevelopment and is likely to enhance the streetscape in this regard. In general the site is considered to be underutilised and in need of redevelopment. The new building and enhanced infrastructure will present a high-quality design and should act as a regeneration stimulus for the City in conjunction with Friargate.

From the South, the site is shielded from view of residential properties along Michaelmas Road by the difference in levels of the site and railway cutting. There will be views across the railway tracks from residential properties at Warwick Court, however these will be in context with the existing station environment and views towards the city centre.

The proposed building would not be out of context with the city centre location and will be designed to synergise with the renaissance of Coventry; in particular the Friargate development and enhanced linkages to the city.

Ecology

The site is not considered to be ecologically important and is not designated.

Prior to development, an ecology survey will be undertaken to assess the potential for roosting bats or other protected species.

Socio-economic Effects

It is estimated that 30,000 new jobs will be generated in Coventry by 2028, with 14,500 of these located in the new Friargate development. Coventry is 1 hour from London by rail, and with local upgrades and new stations opening this will further enhance the city’s connectivity and attractiveness as a place for businesses to invest. The enhanced station will therefore support economic growth.

Water resources & Flood Risks

The River Sherbourne is the closest watercourse to the site. It runs over 600m from the site through the City Centre and partially in culvert. The work at the site is unlikely to impact on the river in either the construction or operational phases as it is remote from the site and the existing built environment will act as a barrier to prevent silt run off or pollution during construction. Any drains on the site will be protected during construction to prevent pollution.
The closest surface water abstractions to the Site are at a distance of 420m and 475m from the Site boundary and these serve a heat pump for IKEA Ltd.

The Environment Agency mapping indicates that the Site is located within Flood Zone 1, indicating a low risk of flooding (1<1,000). The Site is also not classified as at risk in case of catastrophic reservoir failure. There are no surface water features within 500m of the site.

The Site is currently comprised of hard standing and existing buildings and is therefore currently 100% impermeable at present.

**Lighting**

The Site is likely to be classified as an E3 Environmental Zone, which is described as an area of ‘medium district brightness’ in the Institute of Lighting Professionals. The Site is currently lit by a mixture of lighting installations, including street lighting (consisting of reflector optics fitted with a mixture of clear bowls/flat glass mounted on 8m steel columns and by security/decorative façade lighting along the commercial units within the Central Six Retail Park, the offices immediately to the north of the Station and the Station itself.

**Screening Conclusion**

It is considered that the development will not result in significant environmental effects and that the proposed development does not constitute EIA development. Any effects resulting from the development will be limited to the immediate local area.

We would be grateful if you could provide your Council’s opinion regarding this matter.

**Planning Strategy**

As you will be aware with reference to previous works at the station, Network Rail benefits from permitted development rights under both Part 8A and 18 to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.

The Masterplan comprises two main elements that we consider fall under Part 18.

The proposed new footbridge and canopy extensions are deemed to be permitted under Part 18, notwithstanding the requirement for prior approval (as outlined below), and listed building consent. These are discussed in more detail below.

Discussions with Network Rail are ongoing to ascertain whether the new station entrance and the proposed multi-storey car park (MSCP) are to be constructed under the provisions of Part 8A. In the event that it is decided that Network Rail will not exercise their permitted development rights for the new station entrance and the MSCP, a planning application will be prepared and submitted to the local planning authority for the approval of the new station entrance and the multi-storey car park.

Part 18 permits works that have been authorised under Local or Private Acts or Orders, and in this instance, the railway was authorised under the London and Birmingham Railway Act 1833.

Coventry station was subsequently extended under the London and Birmingham Railway Act (Coventry and Nuneaton Railway) 1846, and this Act incorporates the Railway Clauses Consolidation Act 1845 (RCCA) and also extends the powers of the London and Birmingham Railway 1833 to this Act. The future works clauses contained within Section 8 of the London and Birmingham Railway Act and Section 16 of the RCCA permits the
then railway company and their successors in title (now Network Rail), the powers to undertake future works, not limited to the construction of the railway. Extracts from both Acts are attached for ease of reference.

Under Part 18 A.1 (a), the erection of or alteration to a building or bridge is not permitted unless the prior approval of the appropriate authority is first obtained. Section A.2 (a) and (b) set out the parameters for consideration.

Part 8A permits development by railway undertakers on their operational land, required in connection with the movement of traffic by rail. It is considered that the new station entrance and the multi-storey car park would satisfy the requirements of Part 8A and could therefore be constructed as permitted development. Discussions with Network Rail are ongoing on this matter. In the event that it is decided that Network Rail will not exercise their permitted development rights for the new station entrance and the MSCP, a full planning application will be prepared and submitted to the local planning authority for the approval of these elements of the Masterplan.

We would be happy to discuss the Masterplan in more detail and provide additional information should it be required for both the purpose of assessing the proposed works under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended), or clarifying the proposed planning strategy.

Yours sincerely

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