b) A description of the development, including in particular-
   
i. A description of the physical characteristics of the development and, where relevant, of demolition works;

   ii. A description of the location of the development, with particular regard to the environmental sensitivity of the geographic areas likely to be affected;

c) A description of the aspects of the environment likely to be significantly affected by the development;

d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from-

   iii. The expected residues and emissions and the production of waste, where relevant; and

   iv. The use of natural resources, in particular soil, land water and biodiversity; and

e) Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures to avoid or prevent what might otherwise have been significant adverse effects on the environment.
APPENDIX B: Information in accordance with Regulation 6) 2) (b-e)

Application Site

The Application Site (Enclosure A) extends to approximately 21.83 ha and comprises an area of previously developed brownfield land, historically utilised for industrial/commercial purposes. Notably, the Application Site forms part of two allocations for Mixed Use Development within the Coventry City Council Local Plan (December 2017) under Policy H2:4 - Land at Whitmore Park, Holbrook Lane and JE2:6 - Whitmore Park.

The site is enclosed within an industrial/residential setting circa 3.1km north of Coventry City centre in the suburb of Holbrooks. The site forms an area of land north and south of Swallow Road, with Holbrook Lane located east of the site. Recent residential development is situated to the site's west along St Mary's Priory Road (part of the above allocation), with Burnaby Road running parallel with the Site's southern boundary, although the site is separated from this road by residential dwellings. A large proportion of the site was previously utilised by Meggitt for the construction of aircraft braking systems. In 2013 (ref DEMN/2013/1189) a number of unused industrial units south of Swallows Road were demolished and a large proportion of the site has since been left derelict. The northern area of the site beyond Swallow Road however is still in use by Meggitt Aircraft Braking and Control Systems and contains a number of industrial buildings, however Meggitt have confirmed they will be moving into a new purpose built factory offsite later this year. The Proposed Development intends to demolish the majority of these structures, with the exception of the buildings within the parcel identified in yellow below.

There are no Public Rights of Ways (PRoW) that run through the site. There are also no statutory designations applicable to the site and it is not considered the Site lies within a 'sensitive area' as defined by the Regulations.
**Nature and Purpose of the Proposed Development**

The Proposed Development is residential led and is likely to consist of up to 550 residential dwellings, in addition to up to 240,000 sq ft of warehousing and light industrial use which could fall within use classes B1, B2 and/or B8. Although the proposals are still developing, it is likely that the residential element of the development will be located south of Swallow Road and also in the western area of the site north of Swallow Road, so to reflect the surrounding current residential dwellings adjacent to those boundaries. A range of house types are likely to be proposed, which could include a mix of detached, semi-detached, terraced dwellings and apartment blocks, of which will include an element of affordable housing. The density of the residential accommodation across the Application Site would also vary according to the characteristics of that part of the site and accommodation type. The remaining areas north of Swallow Road are likely to include warehousing/light industrial uses up to 240,000 sq ft (GEA).

The principal means of vehicle access into the Proposed Development is likely to be through the utilisation of the existing roundabout off Holbrook Lane, and the subsequent opening of Swallow Road to public traffic, which leads from this roundabout. The internal areas of the site are likely to be accessed off a number of points along Swallow Road that will connect to the internal estate roads associated with the Proposed Development.

The demolition of existing buildings (with the exception of those identified above) and the construction and improvement of associated utilities and infrastructure will also be required to accommodate the Proposed Development.

It is possible that any planning application(s) made will be seeking a combination of detailed and outline permission, however this is not a matter which would affect the outcome of the Screening Opinion.

As noted above, the Application Site forms part of two allocations for Mixed Use Development within the Coventry City Council Local Plan (December 2017) under Policy H2: Housing Allocations, specifically addressed as ‘H2:4 - Land at Whitmore Park, Holbrook Lane’ and also JE2: Provision of Employment Land and Premises, specifically addressed as ‘JE2:6 Whitmore Park’. As CCC are aware, as part of the Local Plan process a Sustainability Appraisal is completed to promote sustainable development through the integration of economic, environmental and social consideration into the preparation of plans and proposals. This includes the consideration of alternative sites when formulating development plans so that the development needs of the city are sustainably met. Through utilising existing brownfield land within the existing urban fabric of Holbrook, the Proposed Development will provide a step towards meeting the growing housing requirements within the area, whilst maintaining compliance with Local Planning Policy.

**Possible Effects on the Environment**

**Section 1 - Applicable Thresholds**

| Does the Proposed Development fall within Schedule 1 (Y/N)? | No |
| If yes what is the applicable description. | N/A |
If yes, the project automatically requires EIA

<table>
<thead>
<tr>
<th>If no, does the Proposed Development fall within Schedule 2 (Y/N)?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, what is the applicable description?</td>
<td>10 (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas</td>
</tr>
<tr>
<td>Is the Project located in or adjacent to a 'Sensitive Area'?</td>
<td>No</td>
</tr>
<tr>
<td>If yes proceed to Section 2.</td>
<td></td>
</tr>
<tr>
<td>If no, what is the corresponding applicable threshold in Schedule 2?</td>
<td>(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) The development includes more than 150 dwellings; or (iii) The overall area of development exceeds 5 hectares.</td>
</tr>
<tr>
<td>Does the Project exceed the applicable threshold (Y/N)?</td>
<td>Yes</td>
</tr>
<tr>
<td>If yes, proceed to Section 2</td>
<td></td>
</tr>
</tbody>
</table>

Section 2 – Assessment of Possible Effects

<table>
<thead>
<tr>
<th>Topic</th>
<th>Analysis</th>
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<tbody>
<tr>
<td>Population</td>
<td>Although it is not considered that the construction of the Proposed Development would result in significant growth in population, the construction period would result in investment into the local economy with direct, indirect and induced jobs formed as a result. At the operational stage, due to the residential nature of the development, there will inevitably be an increase in population of the area, although it is recognised that some of the future residents of the Proposed Development may already live within the area. The anticipated growth in population as result of the proposed residential dwellings and those associated with the employment elements of the scheme will likely increase the spending power of the local economy, benefiting local shops, services and leisure facilities. It is also recognised that the increase in population is likely to increase demand on local services and facilities during the operational phase, including health services and education provision. These matters however can be mitigated for where necessary and have been taken into consideration through the allocation of sites within the Local Plan and their key requirements, alongside the Council's CIL Charging Schedule, where appropriate. Given the sustainable location of the Site within an existing, well</td>
</tr>
</tbody>
</table>
Human Health

| established suburban area that is well connected in terms of its local highway network, public transport and pedestrian network it is not considered that there will be any significant effects arising in relation to population to warrant EIA.  |

| During the construction phase, as with all developments, there would be some potential for minor pollution or nuisance consistent with construction works, i.e. lighting of external works, dust/noise from vehicles/construction processes, surface water run-off from bare earth/stockpiles, plant noise etc. However, construction activities would be appropriately controlled to an acceptable level through the adoption of construction best practice and appropriate and standard safety measures, so to ensure there would not be significant effects in the context of EIA. Such measures could be secured by condition to any planning application, where required.  |

| During the longer-term operation of the Proposed Development the nature of the development is not unusually complex, and it is considered unlikely it will pose potentially hazardous environmental effects, high risks of major accidents or risk to human health. Furthermore, the residential areas of the Proposed Development could indeed be considered to offer an improvement over the current operations of the Site, for example in relation to noise generation, traffic impacts and potential for land contamination.  |

| There are also no known land uses or facilities in the immediate area surrounding the site which have the potential to cause a major accident/disasters or unacceptable nuisance. Whilst it is acknowledged there are potential noise sources in the area such as the road network and existing commercial/industrial uses, the fact the surrounding area includes both residential and commercial/industrial uses, including the recently built residential dwellings on St Mary's Priory Road, this would indicate the Proposed Development's suitability. As part of any application, consideration to existing noise levels will be given so to identify any required mitigation in the detailed design, however it is not considered such issues are likely to result in significant impacts to warrant an ES.  |

<p>| The scale and the nature of the Proposed Development is such that there will be new vehicular traffic movements in the locality, to and from the site. However, this needs to be considered in the context of the current (and past) operation of the Site, specifically the type of vehicles that will be using the Site. Furthermore, the Site is situated within an existing, well established suburban area that is well connected in terms of its local highway network, public transport and pedestrian network that provides additional linkages for other non-car modes of travel. This is recognised by the virtue of its allocation within Coventry's Local Plan. A Transport Assessment and Travel Plan will be submitted as part of the application to ensure any mitigation measures are incorporated into the proposals accordingly.  |</p>
<table>
<thead>
<tr>
<th>Biodiversity</th>
<th>The Application Site is not located within or adjacent to any European site or areas protected under national legislation. The closest statutory designated site is the Wyken Slough Local Nature Reserve (LNR) located circa 3km north east of the Application Site. Given the nature of the designated site and its distance to the site, with limited connectivity, any possible impacts of the Proposed Development are not considered to be significant. The site itself is heavily dominated by industrial units, or recently demolished industrial units with minimal opportunity for habitats for protected species. Furthermore, the Site is enclosed by similar residential and commercial area; thus, it is unlikely there will be protected species or ecological features of value at national county or local level which have connectivity with the Site. Given the current land use and the location of the site, it is considered the site is capable and has the capacity to absorb the development in an ecological context. Therefore, it is considered unlikely that any impacts in relation to biodiversity would result in significant effects in EIA terms. The Proposed Development indeed offers the opportunity to reintroduce habitats within proposed areas of open space, benefitting and improving biodiversity.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land</td>
<td>The Application Site will involve the permanent uptake of an area of land that is currently or has been used for industrial uses. Therefore, considering the development will not include the uptake of any greenfield land and will involve the utilisation of existing derelict land, significant effects are not anticipated. Furthermore, the principle of development in this regard has been established through the site's allocation within the Local Plan.</td>
</tr>
<tr>
<td>Soil</td>
<td>The Proposed Development will be constructed on previously developed industrial brownfield land. A large proportion of the site was previously utilised by Meggitt for the construction of aircraft braking systems. In 2013 (ref DEMN/2013/1189) a number of unused industrial units south of Swallows Road were demolished and a large proportion of the site has since been left derelict. The northern area of the site beyond Swallow Road however is still in use by Meggitt Aircraft Braking and Control Systems and contains a number of industrial buildings, however the company are due to move from the Site later this year. Considering the legacy of industrial use, it is reasonable to anticipate there may be a degree of ground contamination, which would need addressing to ensure the Site is suitable for the Proposed Development. However, with the knowledge to date of the operations which have occurred on site, there are no known existing significant contamination issues that could not be addressed through relatively standard remediation processes. As part of the application, information in relation to</td>
</tr>
</tbody>
</table>
**Water**

Any required remediation or mitigation will be provided accordingly.

The nature of the development is not considered to significantly affect the existing state of any soil resource.

The whole Site is in Environmental Agency (EA) Flood Risk Zone (FRZ) 1 meaning the Site has less than 1 in 1000 annual probability of flooding by river sources. The nearest water course is Hall Brook which lies approximately 0.6km north of the Site and is separated by intervening built form. Coventry Canal is also situated to the east of the site, approximately 1.2km away.

Due to the site currently/previously being utilised for industrial purposes, the majority of the site area is covered by hardstanding. Therefore, the construction of the development is unlikely to significantly increase the surface water runoff rate currently experienced at the site to date. Despite this factor, the site will seek to utilise Sustainable Urban Drainage Systems (SUD's) to control the discharge of surface water to ensure that flood levels are not exacerbated in areas surrounding the development site and therefore pose no greater risk to the surrounding areas than is currently present.

Given the above, the Proposed Development is unlikely to have a significant effect in relation to water resources. National planning policy requires all planning applications above certain thresholds to include a Flood Risk Assessment (FRA), including mitigation in the form of a drainage strategy. An FRA and drainage strategy will be provided as part of any planning application.

**Air**

It is acknowledged the Site lies within the Coventry City-Wide Air Quality Management Area (AQMA), which was designated in 2009 for the whole administrative boundary due to the exceedances of the annual mean NO2 objectives at housing located close to some of the busiest roads in Coventry. The latest report published in February 2018 identified current hotspots at parts of Holyhead Road, Walsgrave Road, Foleshill/Longford Road and Stoney Stanton Road. However, these roads are unlikely to be significantly impacted by the Proposed Development and any traffic generation, given their distances from the Site.

The demolition of buildings and the construction of the Proposed Development could potentially lead to some dust annoyance and locally elevated concentrations of fine particulate matter (PM10). However, these are not considered to be impacts which cannot be successfully mitigated through the implementation of best practice construction methods, which could be set out within a Construction Environmental Management Plan (CEMP), of which could be conditioned to any planning permission if required.
The main operational effects of the Proposed Development on air quality would potentially arise from road traffic emissions due to the introduction of permanent residential dwellings and industrial buildings. However, this needs to be considered in the context of the current (and past) operation of the Site, specifically the type of vehicles that will be using the Site. Furthermore, the Site is situated in a highly sustainable location being close to existing social and community infrastructure and the availability of public transport in vicinity of the site. There are 11 bus stops within 300m of the Application Site boundary that provide services both in and out of the city of Coventry. The Coventry Arena train station also lies only approximately 25-minute walk from the Application Site. As part of any planning application, an Air Quality Assessment will be undertaken which may explore mechanisms to offset any increases in NO₂ brought by the development. Residual significant effects are therefore not anticipated.

It is acknowledged that construction and operation of the Proposed Development may result in the gaseous emissions associated with construction vehicles. Although, considering the scale of the development in the context of the city of Coventry, these emissions are unlikely to be significant. Furthermore, it should be acknowledged that the principle of development has been considered and assessed within the Local Plan process.

When considering the Proposed Developments resilience to climate change, the implementation of a drainage strategy and the site being positioned in FRZ 1, it is considered the Site is a low risk to major accidents and disasters in relation to climatic factors.

Construction would require the initial demolition of existing industrial infrastructure on site. Material from the demolition would be safely managed and dealt with in the most environmentally viable way, with recyclable material being distributed into appropriate recycling streams. The use of natural resources as is standard with construction works, i.e. power/water/construction materials. This is not considered to be an unusual or complex operation and accordingly no significant effects are anticipated. Such measures would be agreed to within a CEMP, which could be conditioned to any planning application, and would ensure that there would be no significant impacts in the context of EIA.

Once operational, the development will require a connection to essential utilities and resources as is standard with residential/industrial developments. This includes: water supply, energy supply, waste water pipelines, gas supply etc. Given the Site is already supplied with such services, it is unlikely that this would result in significant problems. Consideration to capacity and any likely upgrades to such utilities will be considered within the planning application.
Submission.

Waste associated with the operation of the Proposed Development will be no greater than what is expected for a development of this nature and will comprise primarily of residential refuse and recycling. Operational wastes will be managed through providing suitable areas to support the recycling of waste, in accordance with Coventry City Council's guidance.

The brownfield and industrial nature of the Site has limited any 'natural assets' which could be significantly affected.

**Cultural Heritage**

The closest historic statutory designation is The Pilot Public House Grade II Listed Building circa 120m south of the site and 37 and 37A, Lythalls Lane Grade II Listed Building located circa 800m east of the site. The Site is screened from both these assets by built form and significant road infrastructure so direct views are limited. There are no other statutory designations within 1km of the site.

Archaeology is not considered to be a constraint to development given the Site's brownfield nature and there is unlikely to be potential for archaeological remains of value on site.

**Landscape**

The site does not fall within any statutory or non-statutory landscape designations.

As the Site is located within a residential/industrial setting on brownfield land, significant effects on Landscape Character is considered unlikely.

When considering visual receptors, there are a few PROW's within vicinity of the site. Residential receptors also surround the site to the south and west, yet views for the majority of these receptors will be heavily screened through existing built infrastructure. Consideration has been given to incorporating a landscape bund along the south of the site, so to limit views. Furthermore, the siting of the landuses within the Site have been carefully considered, so to ensure the more sensitive residential dwellings are situated in the most suitable areas, for example adjacent to existing residential uses. Accordingly, it is considered unlikely that the proposals will give rise to significant effects in landscape terms that would require an EIA.

A Landscape and Visual Appraisal will accompany the planning application.

**Cumulative and**

On review of the potential impacts, it is not considered that
### Interactive Effects

Any one single receptor will be subject to a combination of individual effects that would be considered significant.

In relation to potential inter-project cumulative effects i.e. the combined effects of a number of individual development schemes, from a search on CCC's planning online register, there are no known "existing and/or approved projects" (as stipulated by Schedule 4, 5e) within the vicinity of the Site which could potentially result in significant effects. It is acknowledged that the Site immediately to the west was subject to a full application in 2012 (FUL/2012/2313) for the demolition of existing buildings and erection of 94 houses, which has subsequently been constructed and is now operational. Similarly, to the north of the Site was an application for the erection of football changing rooms and football pitches. These developments have been considered in the above discussions, and it is not considered they would result in potential significant cumulative impacts.

It is acknowledged that the Site forms part of two allocations within the Coventry Local Plan (residential and employment), and a number of other housing and employment sites are also identified, although the majority of these allocations are not yet "existing and/or approved". On review, the nearest of these allocations, H2:20 / JE2:7, is located to the east of the Site and is located on previously developed land with an allocation for 45 dwellings and c.1.5ha of employment. Given the brownfield nature of the Site, the relatively small proposals and the fact the Site lies beyond the railway line, with areas of significant built form in between the Sites, it is not considered the development of these allocations would result in significant cumulative effects.

Furthermore, it is relevant to consider the work undertaken as part of the evidence base within the Local Plan process, which demonstrated the acceptability at the strategic level for the combinations of these allocations; a key discipline in this work being the strategic impacts on transport. The transport work which will be submitted with the application will be agreed with the County Highways Authority, which will indeed include such future growth, so to ensure any impacts of key future developments are considered and mitigated where necessary.

There are no further sites that we are aware of that would be relevant to consider in relation to cumulative impacts, and therefore it is considered unlikely that there would be significant cumulative impacts which would warrant EIA.

### Further Relevant Comments and Conclusion

As noted above, it is considered that the proposals fall within the category Schedule 2 (10 b) as described in the Regulations. Development proposals described under Schedule 2 require an EIA if they are considered likely to have significant effects on the environment by virtue of factors such as nature, size or location. Given that the Proposed Development exceeds the screening threshold in Schedule 2 (10 b) of including more than 1ha of urban...
development which is not dwellinghouse, including more that 150 dwellings and exceeding 5 ha overall, it is appropriate to Screen the proposals with the Local Planning Authority to determine if there are significant effects likely to arise from the proposals.

The Screening process should consider the development proposals against the criteria and thresholds which are included within the EIA Regulations and supported by the National Planning Practice Guidance (NPPG) in determining the requirement for an Environmental Statement (ES) to accompany an application for planning permission. Specifically, the following:

- Schedule 3 of the EIA Regulations provides selection criteria for Screening Schedule 2 development, which includes three general categories for consideration: the characteristics of the development; the environmental sensitivity of the location; and the characteristics of the potential impacts. The information provided above discusses such matters and has been provided and set out in the above manner so to assist the LPA in reaching their Screening Opinion.

- The NPPG, under the EIA section (Paragraph 057), includes a table accompanying paragraph 4-057-2070720 entitled 'Thresholds and Criteria for the Identification of Schedule 2 development requiring EIA and indicative values for determining significant effects'. This table provides guidance on the issues important to consider in determining whether significant effects are likely in a given proposal. For section 10(b), the Schedule 2 screening threshold guidance contained in the NPPG relevant to this proposal (bearing in mind its brownfield nature) states:

  - "Indicative Criteria and Threshold – 'Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination'."

  - "Key Issues to Consider – 'Physical scale of such developments, potential increase in traffic, emissions and noise.'"

Given the Application Site is on brownfield land and was intensively previously utilised for industrial purposes, it is reasonable to conclude that the Proposed Development would not be at a significantly larger scale than what it was previously used for. Furthermore, any impacts which have been discussed (which are not considered to be significant in EIA terms), are not markedly different in nature to those which the Site previously exhibited, and in fact in a number of areas could result in improvement, for example, in relation to biodiversity and landscape and visual matters. The Site will not be significantly urbanising given its location within the residential/industrial suburb of Holbrook, thus changes are not considered to be significant in the context of the area. Whilst it is acknowledged there is the potential for some level of contamination on the Site given its industrial history, the nature of the industries and their operations occupying the Site is unlikely to have resulted in high levels of contamination which could not be addressed by standard remediation/mitigation measures, and hence it is unlikely that any significant impacts would remain.

Given the nature of the development proposals and for the reasons set out in this document, it is considered that whilst there may be some effects upon the environment as a consequence of the Proposed Development, once mitigation is applied, significant effects on the environment are not anticipated. Accordingly, it is considered that the proposals do not constitute EIA development and would not require an Environmental Statement to be submitted with any planning application in this location.

Pegasus Group recognises that assessment work will be required to supplement the
planning application should it be determined that the Proposed Development does not require an EIA to be undertaken. Technical information will be provided alongside the application to ensure that potential effects are minimise and given appropriate consideration. These supporting statements would likely include:

- Design and Access Statement;
- Planning Statement;
- Transport Assessment;
- Flood Risk Assessment and Outline Drainage Strategy;
- Ecological Appraisal;
- Landscape and Visual Appraisal;
- Heritage Assessment,
- Noise Assessment,
- Air Quality Assessment, and
- Ground Investigation Report.