

## **ENVIRONMENTAL STATEMENT: ADDENDUM**

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Land at Northampton Road, Towcester, NN12 6LD

CC Town Planning on behalf of Clayson Country Homes

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# 1 INTRODUCTION

- 1.1 CC Town Planning have been appointed by Clayson Country Homes Ltd ('The Applicant'), to prepare the following addendum to the environmental statement submitted in support of outline application S/2012/1476/MAF in 2012.
- 1.2 This addendum serves as supplementary information to the Applicant's current application (Ref: S/2020/0467/MAF, submitted 25<sup>th</sup> March 2020) under Section 73 of the Town and Country Planning Act 1990. To allow for the creation of 10 No. apartments at Northampton Road, Towcester.
- 1.3 This addendum is submitted to South Northamptonshire District Council ('SNC') as the Local Planning Authority ('LPA') for the area and should be read in conjunction with all other documents submitted as part of the aforementioned application.
- 1.4 The following seeks to provide the LPA with the requisite level of information, and serves as a supplementary and anecdotal update in respect of the 2012 Environmental Statement carried out by AECOM to enable the determination of the enclosed application at the earliest opportunity and is structured as follows:

Section 2: Provides contextual information in respect of the site, its previous planning history and an overview of the current application which is deposited with the Council under Section 73 of the Town and Country Planning Act 1990.

Section 3: Provides an overview of the Environmental Statement which was produced in respect of the wider Moat Lane, Towcester, Regeneration Area, including an overview of the conclusions set out therein in respect of those technical areas which it covered.

Section 4: Seeks to provide an anecdotal assessment of the proposed development in light of those technical areas which could potentially be impacted as a result of the proposal and the resultant environmental impacts.

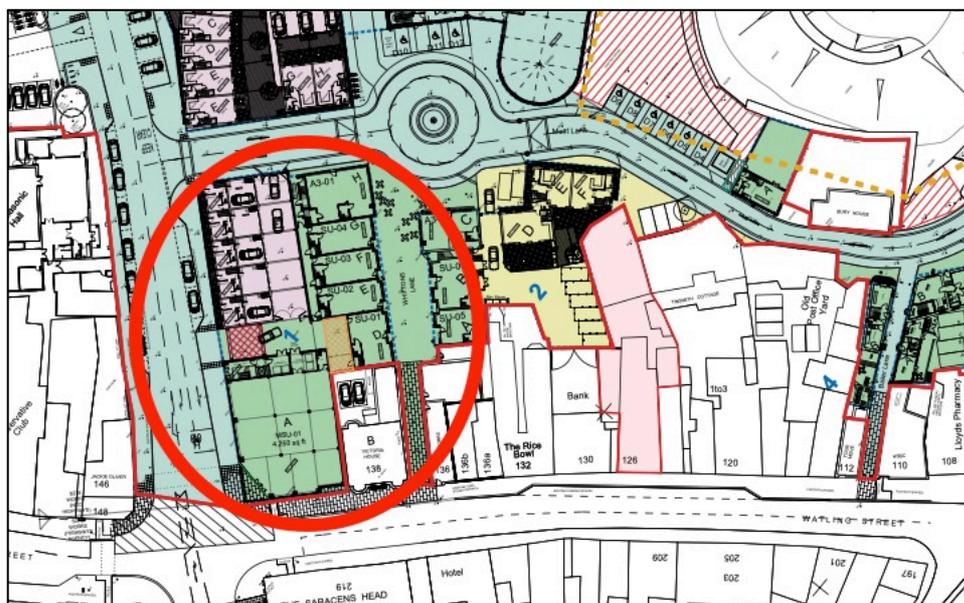
Section 5: Offers some concluding remarks.

## 2 SITE CONTEXT AND PROPOSAL

### The Site

- 2.1 The development site falls within a wider regeneration area, known as Moat Lane, which has historically been identified within the development plan as a key regeneration objective and policy provisions have been contained within the development plan for a significant period to allow this redevelopment to take place.
- 2.2 The wider scheme comprises of a community building, public realm and footpath improvements, enhancement of the Bury Mount Schedule Ancient Monument as well as the delivery of market and affordable housing and various other uses including various elements of retail and community floorspace.
- 2.3 The proposal to which this document relates focusses on a minor element of the wider scheme which has previously received consent for residential development. Work has commenced on this element of the wider regeneration initiative, however the proposal to which this addendum related seeks to secure planning consent for an alternative residential scheme through varying planning conditions imposed at outline stage.
- 2.4 For absolute clarification, this submission relates to elements of the Clayson Country Homes interests in the second and third regeneration phases of the wider Moat Lane Regeneration area as shown on Drawing No. 1025P05 (Moat Lane – Towcester Moat Lane – Phasing Plan) dated 5<sup>th</sup> November 2015 and originally enclosed with the suite of application documents. An extract of the enclosed phasing plan, with application area demarked is set out at Plate 1 below.

**Plate 1: Phasing Plan (Extract)**



2.5 A detailed appraisal of the site location and the role it plays in the wider Moat Lane Regeneration Area is set out in the Planning Statement submitted with the application and it is urged that the content of that statement should be considered in its entirety with this submission.

#### Planning History

2.6 The proposed development site forms part of the wider Moat Lane Regeneration area which received planning consent for a mixed-use development under reference S/2012/1476/MAF.

2.7 Various applications have been submitted for the wider site since the grant of the original consent, these are detailed below.

- **S/2012/1476/MAF** - The regeneration of Moat Lane/Northampton Road area to bring forward a new community building, enhancements to a Scheduled Ancient Monument and a mixed use development comprising both new build elements and change of use to include offices, library, residential, retail, café/restaurant, and light industrial uses, with associated public realm works, demolition, landscaping and engineering works and car parking provision at Moat Lane Towcester. Approved 31<sup>st</sup> July 2013.
- **S/2015/2925/MAF** - Variation of condition 2 (Plans), condition 4 (Use) and Condition 23 & 26 (Remove reference to B1 (c) use) and removal of condition 6 (code level 3) and condition 32 (Activity connected with B1 (c) use) to S/2012/1476/MAF (The Regeneration of Moat Lane)(The original application was submitted with and Environmental Statement) to enable change of use from approved offices (B1 (a)) and light industrial (B1 (c)) units and reduction in floor space of the A3 use from 330sq m to 171sq m to create a further 17 residential units. Approved 29<sup>th</sup> March 2016.
- **S/2018/0643/MAF** - Variation of Condition 1 (Plans) of Planning Permission S/2019/0556/MAF (Variation of Condition 28 (noise and odour control) of S/2018/1663/MAF Variation of Condition 1 (plans) of planning permission S/2017/1579/MAF (Variation of condition 1(plans) of planning permission S/2015/2925/MAF (The regeneration of Moat Lane, original application S/2012/1476/MAF submitted with an Environmental Statement) to increase ridge height of plots 32 - 36, insertion of 5 dormer windows northwest elevation, 5 new roof lights southwest elevation, associated elevation changes and creation of 4th bedroom to each plot. Not determined.

- **S/2019/0942/MAF** – Variation of Condition 4 (Use) to S/2019/0556/MAF (Variation of Condition 28 (noise and odour control) of S/2018/1663/MAF Variation of Condition 1 (plans) of planning permission S/2017/1579/MAF (Variation of condition 1(plans) of planning permission S/2015/2925/MAF (The regeneration of Moat Lane, original application S/2012/1476/MAF submitted with an Environmental Statement) to change the use of Plot H (Unit 55) to either A1 at A3 use at Land off Moat Lane Towcester NN12 6AD (Plot H – Unit 55 – Whittons Lane). Approved 26<sup>th</sup> September 2019.

- 2.8 This document relates to that environmental statement which was carried out by AECOM in relation to the wider regeneration area and published in October 2012.
- 2.9 The conclusions of the environmental statement are set out in the following section.

### 3 ENVIRONMENTAL STATEMENT (2012)

- 3.1 The key findings of the environmental impact assessment undertaken for the wider Moat Lane Regeneration area are set out below;

#### Air Quality

- 3.2 Chapter 6 of the environmental statement includes an assessment of the potential local air quality impacts of the proposed Moat Lane Regeneration Project. The proposed site is adjacent to Watling Street (A5), part of which has been identified as an area of poor air quality and has been designated as an Air Quality Management Area (AQMA) by South Northamptonshire Council.
- 3.3 A detailed level operational phase assessment was conducted with reference to the methodology outlined in the Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1 HA 207/07 (HA, 2007) and assessed in accordance with the EPUK document 'Development Control: Planning For Air Quality' (EPUK, 2010).
- 3.4 It considered that the significance of impacts during the demolition phase will be 'Negligible Adverse', during construction phase will be of 'Minor Adverse' and during occupation will be 'Negligible Adverse'.

#### Archaeology and Cultural Heritage

- 3.5 Chapter 7 of the environmental statement includes an assessment of the archaeology and cultural heritage within the site boundary of Moat Lane Regeneration Project and also the immediate area surrounding the site.
- 3.6 In total, forty-eight sites were noted within the site boundary including two Listed Buildings and a Scheduled Monument. One other Scheduled Monument is located in the immediate

area outside of the site along with a number of Listed Buildings, a Registered Park and Garden, and a Conservation Area.

- 3.7 There is potential for previously unrecorded archaeological features to be found within the site boundary, and evaluation work undertaken has produced extensive evidence for occupation from at least the Roman period onwards. As a result, further detailed open area excavation will be required with construction-phase archaeological supervision in other areas.
- 3.8 The overall significance of impact of the proposed project is considered to be 'Moderate Adverse'.

#### Ground Conditions

- 3.9 Chapter 8 of the environmental statement contains an assessment of ground conditions. Initial ground investigations have been undertaken at the site, and potential effects have been identified during both the construction and occupation phases of the proposed development.
- 3.10 All of the construction impacts can be substantially reduced or removed by further ground investigation and risk assessment, and adherence to good site practice, resulting in 'Neutral' significance for residual construction effects.
- 3.11 A number of occupation phase impacts are likely to create potential effects. However, by implementing proposed mitigation measures any residual impacts will be reduced to 'Neutral' significance.

#### Ecology and Nature Conservation

- 3.12 Chapter 9 of the environmental statement includes an assessment of the impact of the proposed Moat Lane Regeneration Project on ecology and nature conservation.
- 3.13 The impact of the regeneration project is assessed as 'Minor Adverse' without mitigation measures. This is due to temporary disturbance to habitats, permanent habitat loss and the potential to harm/disturb protected species during the works.
- 3.14 Works must be timed to avoid the most vulnerable periods for the protected species identified on site and measures will be implemented to ensure that protected species are avoided or moved out of the working area before works commence.
- 3.15 Compensation and enhancement measures will also be implemented to create a 'Neutral / Minor Beneficial' significance for overall residual impact for the habitats and species on site. Measures will include the creation of additional roosting opportunities, avoid indirect impact upon foraging and commuting bats by the project design and sensitive lighting, planting native species to compensate for habitat lost, works to Mill Stream to improve its

benefit to wildlife, creation of habitat suitable for grass snakes and the provision of bird nesting boxes.

#### Townscape and Visual

- 3.16 Chapter 10 of the environmental statement includes an assessment of the impact of the proposed Moat Lane Regeneration Project on the existing townscape and visual resource of the townscape and visual study area.
- 3.17 The regeneration project will be likely to create a 'Moderate Beneficial' significance improvement to the landscape and townscape character of the site and its immediate surroundings within Towcester. While the site opens to rural countryside along its eastern edge the trees along the banks of the mill stream and the parkland landscape of the Watermeadows and Easton Neston Estate help to mitigate views into the proposed Moat Lane site from the east. The proposals would incorporate the character of existing built elements into the Towcester townscape structure to achieve continuity and would be in keeping with the overall landscape/townscape character of Towcester and the surrounding area.
- 3.18 Through substantial townscape improvements the proposals would bring positive continued regeneration to this area of South Northamptonshire. Once complete, the development presents an opportunity for improvement to the townscape of Towcester and its immediately surrounding setting and character.

#### Water Quality

- 3.19 Chapter 11 of the environmental statement includes an assessment of the proposed Moat Lane Regeneration Project on surface water quality. There is the potential for 'Significant Adverse' impacts to occur to the water environment during construction works from silt-laden runoff and chemical spillages. However, providing that good practice is followed during construction, including appropriate mitigation measures, all construction impacts can be reduced to 'Neutral'.
- 3.20 The site poses a low risk of water pollution from diffuse urban pollution and other pollutant sources during the site's occupation. Surface runoff from existing developed areas will drain to a combined sewer, along with all foul flows from the site and no increase in impact from these flows will occur. Surface runoff from new areas will drain to the Mill Stream via a new separate surface water sewer system via permeable pavements which will provide treatment and flow attenuation. No adverse impacts are therefore predicted. The installation of a new outfall will lead to a permanent morphological impact to the Mill Stream, although this will be very localised and will result in a 'Minor Adverse' impact only, which is not considered to be significant. No other residual impacts are predicted.

### Flood Risk

- 3.21 Chapter 12 of the environmental statement includes an assessment of the proposed Moat Lane Regeneration Project on flood risk and drainage. The site is mainly located within Flood Zone 1; at low risk of fluvial flooding, with a small portion falling in Flood Zones 2 and 3. The layout has been developed sequentially within the site and the most vulnerable land uses directed to the least flood risk zones, where possible. The Exception Test is expected to be passed for the existing Mill Building.
- 3.22 The chapter considered the baseline conditions of the site. Mitigation measures have been suggested for potential impacts to both the construction and operation phases of the development. Residual and cumulative impacts have also been identified. There are no expected significant impacts to flood risk during the construction and operation of the project and the overall residual impacts are of 'Neutral' significance.

### Noise and Vibration

- 3.23 Chapter 13 of the environmental statement includes an assessment of the proposed Moat Lane Regeneration Project on noise and vibration and It is predicted, based upon professional qualitative judgement, that once the Proposed Development is fully occupied vibration impacts, primarily likely to be associated with road traffic, should be no greater than 'Minor Adverse', subject to the condition and maintenance of road surfaces.

### Traffic and Transportation

- 3.24 Chapter 14 of the environmental statement has assessed the potential environmental impacts from transport for the operational phase of the site. It is expected that the proposed regeneration will result in only minimal increases in traffic.
- 3.25 The assessment suggest that the traffic will increase by less than 10% on the majority of links within the study area, with increases of greater than 10% being limited to the site accesses. A review of the impact of the increased traffic levels has been undertaken in respect of the likely impact on pedestrian severance and delay, fear and intimidation, driver delay and safety. It is considered that the level of increase will have a 'Negligible Adverse' significance impact in respect of each of these criteria. Moreover, the development will be designed to provide an attractive environment that is well linked to the surrounding areas, thus encouraging non-motorised modes.

### Waste

- 3.26 Chapter 15 of the environmental statement identifies the key impacts of the proposed Moat Lane Regeneration Project related to waste generation.
- 3.27 The waste generated by the proposed development is likely to have a 'Negligible Adverse' impact on the local and regional waste management infrastructure during the demolition

and construction phase. During the construction phase, emphasis will be placed on the efficient use of materials (through adherence to a Site Waste Management Plan) and the necessity to minimise waste generation. Demolition waste, such as building stone and good quality bricks, will be reused within the development where feasible. Even so, robust measures will be put in place to ensure that the maximum level of material is captured for reuse, recycling and recovery.

- 3.28 Waste arising from the residential area of the proposed development during the operational phase is likely to have a 'Minor Adverse' impact on the local and regional waste management infrastructure. Waste arising from the commercial and retail facilities is likely to remain 'Negligible Adverse' and will be collected and disposed of under commercial arrangements, in accordance with relevant legislation.
- 3.29 Plate 2, which is set out below, provides an overview of those perceived impacts in respect of each technical area as extracted from the original environmental statement, a discussion in respect of each technical area is conducted within the following section.

**Plate 2: Summary of Environmental Statement Conclusions**

| Chapter                           | Predicted Impacts  |
|-----------------------------------|--|
| Policies and Plans                | <ul style="list-style-type: none"> <li>Compliant</li> </ul>  |
| Air Quality                       | <ul style="list-style-type: none"> <li><b>Negligible Adverse</b> impact during demolition.</li> <li><b>Minor Adverse</b> impact during construction.</li> <li><b>Negligible Adverse</b> impact during occupation.</li> </ul>   |
| Archaeology and Cultural Heritage | <ul style="list-style-type: none"> <li><b>Moderate Adverse</b> impact.</li> </ul>  |
| Ground Conditions                 | <ul style="list-style-type: none"> <li><b>Neutral</b> impact during demolition/construction.</li> <li><b>Neutral</b> impact during occupation.</li> </ul>  |
| Ecology and Nature Conservation   | <ul style="list-style-type: none"> <li><b>Neutral / Minor Beneficial</b> impact.</li> </ul>  |
| Townscape and Visual              | <ul style="list-style-type: none"> <li><b>Moderate Beneficial</b> impact.</li> </ul>   |
| Water Quality                     | <ul style="list-style-type: none"> <li><b>Neutral</b> impact during demolition/construction.</li> <li><b>Minor Adverse</b> impact during occupation.</li> </ul>  |
| Flood Risk                        | <ul style="list-style-type: none"> <li><b>Neutral</b> impact.</li> </ul>   |
| Noise and Vibration               | <ul style="list-style-type: none"> <li><b>Minor / Moderate Adverse</b> noise impact during demolition/construction.</li> <li><b>Minor Adverse</b> vibration impact during demolition/construction.</li> <li><b>Moderate / Major Adverse</b> noise impact during occupation.</li> <li><b>Minor Adverse</b> vibration impact during occupation.</li> </ul> |
| Traffic and Transportation        | <ul style="list-style-type: none"> <li><b>Negligible Adverse</b> impact.</li> </ul>  |
| Waste                             | <ul style="list-style-type: none"> <li><b>Negligible Adverse</b> impact during demolition/construction.</li> <li><b>Minor Adverse</b> impact during occupation for residential waste.</li> <li><b>Negligible Adverse</b> impact during occupation for commercial waste.</li> </ul>   |
| Cumulative Effects                | <ul style="list-style-type: none"> <li>None anticipated.</li> </ul>  |

## 4 **ADDITIONAL INFORMATION**

4.1 At the outset, the planning policy position is a key driver of the current proposals and Section 38(6) of the Planning & Compulsory Purchase Act 2004 states that the statutory Development Plan will continue to be the starting point in the consideration of planning applications for the development or use of land, unless material considerations indicate otherwise. This is reinforced within the National Planning Policy Framework (2019) ('NPPF').

4.2 The proposal remains within the thrust of that which was originally permitted, there are no differing development typologies proposed and whilst the quantum of residential development is altering, the proposed development will only result in a modest increase in residential floorspace. This proposal is therefore entirely pursuant to that which was originally permitted.

4.3 A thorough, considered and detailed appraisal of the proposal from a planning policy perspective is set out within the accompanying planning statement submitted with the planning application.

4.4 The following seeks to provide commentary in respect of each of those technical areas identified within the original environmental statement and those conclusions, contained therein, which are set out in Section 3 of this addendum.

### Air Quality

4.5 It is considered that the original conclusions in respect of the proposals impact on air quality will be upheld in light of the revisions proposed by the enclosed planning application.

4.6 Whilst the quantum of units may have changed, the level of build form remains as per the originally permitted consent.

4.7 As such it is considered that the following, as taken from Plate 2, are applicable;

- Negligible adverse impact during demolition phase.
- Minor adverse impact during construction phase.
- Negligible adverse impact during occupation.

### Archaeology and Cultural Heritage

4.8 It is considered that the revised proposal, other than minor alterations, is in keeping with those originally approved proposals for this phase of the site.

4.9 As such, there is considered to be a moderate adverse impact on archaeology and cultural heritage as a result of this development proposal.

#### Ground Conditions

- 4.10 The footprint of the building remains as per the original consent, there will be no impact of the revised proposal on ground conditions and therefore the original conclusions as set out within the environmental statement are upheld.
- 4.11 The impact of this proposals on ground conditions is therefore neutral.

#### Ecology and Nature Conservation

- 4.12 The proposed development will not impact on habitats or cause permanent habitat loss, nor does it have the potential to harm or disturb protected species.
- 4.13 The proposed modification falls within the envelope of that which was originally approved.
- 4.14 Therefore, the conclusions as set out within the original environmental statement are upheld and in consideration of the wider compensation schemes the Moat Lane Regeneration Area proposals have fed into, there will be a neutral / minor beneficial impact on ecology and nature conservation in the locale.

#### Townscape and Visual

- 4.15 The original environmental statement conclusions for the proposals impacts on visual appearance state that *'The regeneration project will be likely to create a 'Moderate Beneficial' significance improvement to the landscape and townscape character of the site and its immediate surroundings within Towcester'*.
- 4.16 The proposals within this application relate to a minor element of the wider site and externally the proposed modifications will not impact adversely on the townscape.
- 4.17 Whilst the footprint of the building remains as per the previously approved proposals, the height of the building is also closely in alignment with that which was previously proposed and in planning terms, particularly for the purposes of this assessment, will have no greater impact on visual appearance or the townscape experience within this part of Towcester.
- 4.18 It is accepted that there will be moderate alterations to the envelope of the building through the introduction of design features in the roof, namely the installation of dormers and rooflights. These minor alterations will allow for the conversion of the roof space and are largely in keeping with similar features across the town.
- 4.19 Whilst there are minor modifications to the design and envelope of the building, these are not considered, when cumulatively assessed with the wider proposal, to have any adverse impacts and are considered almost neutral in their impact.
- 4.20 As a result, it is considered that the original conclusions in this respect are upheld and that this element of the wider regeneration project will be likely to create a moderate beneficial'

significance improvement to the landscape and townscape character of the site and its immediate surroundings within Towcester.

#### Water Quality

- 4.21 Environmental impacts in respect of water quality are focussed on the Mill Stream element if the wider regeneration area.
- 4.22 This is located at some distance from the phase to which this application relates.
- 4.23 Consequently, it is considered that whilst there may be a localised impact on water quality, this will be of no impact to the Mill Stream and as such the conclusions of the original environmental statement in respect of water quality remain applicable and should be upheld.

#### Flood Risk

- 4.24 The site falls within Flood Zone 1 which is a low risk of fluvial flooding.
- 4.25 The proposals do not include any increases in built form over and above that which has previously been assessed as acceptable and subsequently granted planning consent.
- 4.26 Consequently, there are no expected significant impacts to flood risk during the construction and operation of this element of the wider project and therefore the residual impacts, when considered in conjunction with the wider site, are of neutral significance.

#### Noise and Vibration

- 4.27 Once again, the level of built form at the site is in keeping with that which was assessed as part of the original environmental assessment.
- 4.28 Furthermore, in the post construction operational phase, appropriate conditions and mitigations measures have formed part of the approval process to ensure that no adverse impacts are encountered.
- 4.29 As such the impact in this respect is neutral and the original conclusions apply.

#### Traffic and Transportation

- 4.30 The assessment of the environmental impact of the traffic associated with the proposed Moat Lane Regeneration Project has been based upon traffic flows set out in the Transport Assessment. Within the Transport Assessment due consideration has been given to any other committed developments and the scope of the assessment was agreed with the consultees.
- 4.31 The original assessment concluded that no adverse cumulative impacts would arise as a result of this development.

- 4.32 The proposals set out herein seeks to increase the number of residential units. However, the number of bedrooms and residential floor areas remain largely as per the original outline consent.
- 4.33 Therefore, in comparison to the level of development assessed through the original submission, the increase in units proposed by this application (and the corresponding floorspace to be delivered) will cause a negligible increase in development.
- 4.34 As such there are no adverse impacts predicted as a result of this proposal.

#### Waste

- 4.35 Initial impacts identified within the original environmental statement related to the construction phase of the development, this is now largely complete and as a result there will be neutral impacts in this respect.
- 4.36 Whilst the number of households will increase, this will be a minor increase in percentage terms when considering the wider development proposal in its entirety.
- 4.37 The residential element of has already been assessed as having a minor adverse impact on the regions waste management infrastructure and it is considered that this conclusion should be upheld and continues to ring true in respect of this varied development proposal.

## 5 **CONCLUSION**

- 5.1 In assessment against those relevant elements of the development plan, as outlined at Para 4.2 above, it is considered that the proposed alterations to the development and the associated variation to conditions imposed on the original consent would not comprise the development's accordance with those relevant policies from the Development Plan or the NPPF.
- 5.2 Finally, in appreciation of the summary of those impacts outlined above, it is considered that the residual impacts (after mitigation) remain unchanged from those set out at Plate 2 of this addendum and as set out within the findings of the original environmental statement.