

# **ENVIRONMENTAL STATEMENT ADDENDUM**

WOLBOROUGH BARTON, NEWTON ABBOT

PREPARED FOR  
ANTHONY REW, JILL REW AND  
STEVEN REW (THE REW FAMILY)

APRIL 2019



13a-15a Old Park Avenue, Exeter,  
Devon. EX1 3WD United Kingdom  
t: + 44 (0)1392 363812  
f: + 44 (0)1392 262805  
w: [www.pclplanning.co.uk](http://www.pclplanning.co.uk)

## **Contents**

<b>1.0</b>	<b>Introduction</b>	<b>Page no. 4</b>
<b>2.0</b>	<b>Consideration of implications</b>	<b>Page no. 8</b>
<b>3.0</b>	<b>Socio economic update</b>	<b>Page no. 9</b>
<b>4.0</b>	<b>Landscape and visual update</b>	<b>Page no. 10</b>
<b>5.0</b>	<b>Ecology and nature conservation update</b>	<b>Page no. 12</b>
<b>6.0</b>	<b>Cultural heritage update</b>	<b>Page no. 13</b>
<b>7.0</b>	<b>Traffic and transport update</b>	<b>Page no. 15</b>
<b>8.0</b>	<b>Water resources, flood risk and drainage update</b>	<b>Page no. 16</b>
<b>9.0</b>	<b>Dust and air quality update</b>	<b>Page no. 17</b>
<b>10.0</b>	<b>Ground conditions update</b>	<b>Page no. 18</b>
<b>11.0</b>	<b>Noise update</b>	<b>Page no. 19</b>
<b>12.0</b>	<b>Conclusion</b>	<b>Page no. 20</b>

## **Figures**

Figure 1 - Plan showing submitted proposals for Langford Bridge Farm

## **1.0 Introduction**

1.1.1 The undertaking of an Environmental Impact Assessment (EIA) including the preparation of an Environmental Statement (ES) is required to accord with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations.

1.1.2 The appeal site forms part of the NA3 allocation in the Teignbridge Local Plan. That plan was examined in 2013 and the Inspector's Report (IR) published in April 2014. The assessment of legal compliance of that plan is set out at paragraph 138 (page 37) of the IR and that assessment refers back to paragraph 7 (page 5) of the IR. The assessment was considered adequate (as was the Appropriate Assessment). With particular regard to the NA3 site the Inspector concluded that:

*"In summary, after careful consideration of the many objections to its development, I have come to the same conclusion as the Council that the NA3 allocation would provide for a sustainable extension to Newton Abbot and is sound. There are no other sites large enough to meet the housing needs of Teignbridge in accordance with the strategy to concentrate development at HoT. NA3 has the major advantage of a highly sustainable quotation."* (paragraph 75, page 22).

1.1.3 The applicant submitted a request for an ES Scoping Opinion to the Council on 27<sup>th</sup> October 2015 (see ES Volume 2, paragraphs 1.2.3-1.2.5, page 13). In accordance with regulation 76 of the 2017 EIA Regulations, this ES therefore falls to be considered in the context of the 2011 EIA Regulations (see ES, Volume 2, paragraph 1.2.2).

1.1.4 The ES that was submitted in June 2017 considered, so far as was reasonably possible, the likely impacts that may accrue from other development proposed in the area. In relation to cumulative effects, that ES contained an assessment of two types of effect:

1. The combination of individual effects (e.g. noise, dust, traffic, visual) from the development on a particular receptor; and

2. Effects from several developments, which individually might be insignificant, but when considered together would create a significant cumulative effect.

- 1.1.5 The first type of cumulative effects was dealt with solely in Chapter 14 of this ES. In terms of second type of effects these are dealt with in each of the technical chapters (Chapters 6 to 13).
- 1.1.6 This Environmental Statement Addendum (ES Addendum) has been prepared to supplement the Environmental Statement (Volumes 1 to 3, dated June 2017) and ES Addendum (dated December 2017) and further ES Addendum in respect of noise (dated January 2019).
- 1.1.7 This ES Addendum has been prepared to consider the implications of the planning application submitted in respect of Langford Bridge Farm.
- 1.1.8 Part of the Langford Bridge Farm application site was allocated through the NA3 allocation. This allocated part was assessed as part of the original ES (June 2017) and subsequent Addenda. However, the application which has now been submitted exceeds the allocation. This addendum seeks to assess the implications of the application in so far as it has not already been assessed.
- 1.1.9 The ES Scoping Report which was submitted to the Council, (ES, Technical Appendix 1.1) confirmed that the Appellant would, as part of the consideration of cumulative effects, consider the development proposed for the remainder of the NA3 allocation, which was understood, at that time, to be set to deliver circa 300 dwellings.
- 1.1.10 At paragraph 8.8.5 of the ES reference is made to the remainder of the Wolborough allocation as proposed to deliver circa 300 dwellings; employment space; secondary school and public open space/ recreation space, immediately east of the application site.

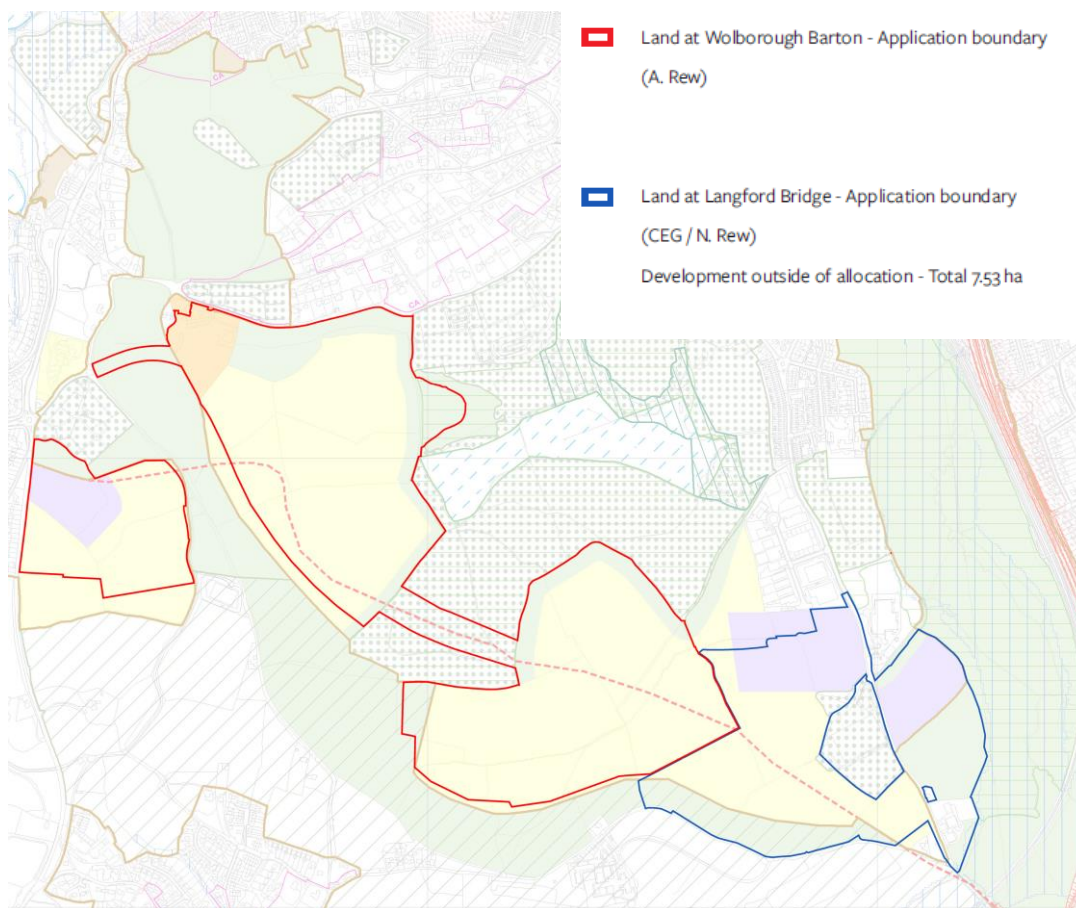
- 1.1.11 Technical Appendix 7.1 (page 94) also refers to the quantity of development proposed for the remainder of the allocation as circa 300 dwellings, and notes that this would be considered as part of the assessment of cumulative effects.
- 1.1.12 A summary of those schemes that were considered as part of the assessment of cumulative effects can be found at table 2.1 of Vol 2 of the ES (pages 18 and 19). A row in that table identifies the 'remainder of the Wolborough allocation (NA3)'. That table identifies a mixed-use extension comprising circa 130 residential dwellings. Clearly that figure is inconsistent with the text of both the scoping opinion and the text of the ES. The figure of 130 in the summary table is incorrect.

### **Purpose of this Addendum**

- 1.1.13 On 25<sup>th</sup> January 2019 a planning application was submitted on land to the south west of the appeal site, known as Langford Bridge Farm. The application (ref. 19/00238/MAJ) is for:

*Hybrid planning application seeking full planning permission for part link road and vehicular access point to the site from Kingskerswell Road and Priory Road, outline planning permission for residential led mixed use development comprising up to 450 dwellings within Use Class C3, a local centre of up to 279 sq metres (GIA) with in Use Classes A1, A2, A3, D1 and D2, up to 22,000 sq metres of employment uses including all B class uses, infrastructure and associated development including demolition or conversion of existing farm buildings. Points of access and part link road submitted in full detail for approval with all other matters reserved*

- 1.1.19 The application (which has yet to be determined) includes an area of land that is not allocated for development by virtue of NA3. The additional land beyond the allocation extends to some 7.53 ha, as shown on the plan below.



1.1.20 The Rule 6 party, Abbotskerswell Parish Council and Wolborough Residents' Association in their letter dated 18<sup>th</sup> March 2019, alleged that the ES had failed to consider, at all, the Langford Bridge proposal. This is plainly not the case. The ES has considered the Langford Bridge proposal (referred to as the remainder of the NA3 allocation) in so far as it could be anticipated at that date (i.e. in accordance with the allocation). The ES could not have anticipated the precise form of development that would be comprised in a planning application submitted after the ES had been prepared.

1.1.21 This Addendum considers the implications of the proposals at Langford Bridge Farm, insofar as they differ from the assessment carried out in June 2017.

## **2.0 Consideration of Implications**

### **Introduction**

2.1.1 The original ES (June 2017) and ES Addendum (December 2017) submitted for the proposals covered the following specialist/technical topic areas/chapters:

- Socio economic;
- Landscape and visual;
- Ecology and nature conservation;
- Cultural heritage;
- Traffic and transport;
- Water resources, flood risk and drainage;
- Dust and air quality; and
- Ground conditions

2.1.2 The ES addendum dated January 2019 considered the issue of noise.

2.1.3 As set out at paragraphs 1.1.6-1.1.7 above, cumulative effects in relation to several developments, were dealt with in each of the individual technical chapter of the ES.

2.1.4 Each of the chapters of the ES/Addenda have been reviewed by the relevant consultant. The remainder of this ES Addendum provides an update in respect of each of these topic areas as necessary.



### **3.0 Socio economic update**

- 3.1.1 The assessment of cumulative socio-economic impacts was set out in section 6.7 of the ES (June 2017).
- 3.1.2 The proposals, together with the range of other committed/ planned developments in the area, will have a significant cumulative beneficial impact in relation to local expenditure and employment during the construction and operational phases.
- 3.1.3 The proposals would have a beneficial impact in terms of housing provision and meeting local needs.
- 3.1.4 Undoubtedly, there will be an associated increased demand for the range of social infrastructure, including local education, open space and community facilities. Provided that the scheme delivers, either by way of financial contribution, or through on-site provision, the required physical and social infrastructure to meet the needs of the increased location population, then as with the other schemes considered, there is the opportunity to deliver substantial socio-economic benefits within the study area.
- 3.1.5 The amended proposals for development at Langford Bridge Farm would not alter the assessment of socio-economic impacts already set out in the ES in any discernible manner.

## **4.0 Landscape and visual update**

- 4.1.1 Section 7.8 of the ES was informed by the Landscape and Visual Impact Assessment (LVIA) of the application (Technical Appendix 7.1).
- 4.1.2 Specific comments in relation to the remainder of the NA3 Wolborough allocation were set out on page 94, Section 7.0 of Technical Appendix 7.1, with more general comments in relation to the consideration of other developments in the wider Newton Abbot/ Heart of Teignbridge area.
- 4.1.3 Development around the periphery of Newton Abbot and other local settlements would result in localised cumulative adverse visual and landscape impact. This is an unavoidable impact of development/construction and is an accepted impact in the context of the need to build housing and associated facilities/infrastructure to support the growth of the Heart of Teignbridge – as set out in the Teignbridge Local Plan.
- 4.1.4 As set out on page 94 (Technical Appendix 7.1 of the ES), due to the proximity to the appeal site, the development of the remainder NA3 allocation, would likely result in cumulative landscape and visual impacts upon:
- The character and landscape setting to the watercourse discharging from the south-eastern parcel of the appeal site;
  - Sequential and in combination effects from Priory footpath;
  - In-combination effects to views from the southern parts of Milber looking west across the Aller Valley, where the appeal proposals within the south-eastern parcel of the site would already be clearly visible;
  - In-combination views from the South Devon Highway where the proposals within the appeal site would be seen beyond the eastern parcels of the NA3 allocation area;

- Sequential and 'in-combination' effects from Priory Road and Kingskerswell Road; and
- In-combination impacts from the public right-of-way on the hillside above Aller Park.

- 4.1.5 The impacts will affect landscape and visual receptors that are already subject to significant magnitudes of change, principally as a result of the proposals within the appeal site. None of the cumulative effects identified above would result in additional significant impacts.
- 4.1.6 The development now proposed at Langford Bridge Farm includes additional land beyond the NA3 allocation towards the east and south. The only potential viewpoints assessed in the LVIA which may to be affected by this change is from the south east, from the South Devon Highway (viewpoint I, page 89, Technical Appendix 7.1), where there is potential for views towards the southern/ south-eastern parcels of the NA3 allocation. However, viewers in passing vehicles are generally regarded as only having a medium sensitivity to change, so the change in magnitude of impacts would not be significant.
- 4.1.7 As set out in paragraph 7.8.3 of the ES, all developments will be required to implement site specific mitigation measures to reduce visual and landscape impacts as required. As such, cumulative impacts will be reduced/minimised as a far as is possible and there will be beneficial impacts in terms of green infrastructure provision.
- 4.1.8 The submitted proposals at Langford Bridge Farm would not alter, in any significant manner, the assessment and conclusions set out in the ES.

## **5.0 Ecology and nature conservation update**

- 5.1.1 In Section 8.8.5 of the ES, Volume 2, the remainder of the Wolborough NA3 allocation was considered within an assessment of cumulative effects assessment in relation to ecology and nature conservation.
- 5.1.2 The Langford Bridge site is located immediately east of the appeal site and consists of arable and improved fields bounded by hedgerows, reasonably extensive areas of semi-improved grassland, marshy grassland, and scrub.
- 5.1.3 The ecological surveys for the Langford Bridge site found that in relation to the semi-improved grassland and woodland parcels, no greater horseshoe bat activity was recorded, with only occasional recordings of common pipistrelle, *Myotis* sp. and lesser horseshoe bat (Langford Bridge ES, Appendix 9.1, Figures 9.5-9.17). Bird species recorded within the area included blackbird, blue tit, long-tailed tit, chiffchaff, robin, wren, herring gull, magpie and great tit.
- 5.1.4 The Langford Bridge ES includes a suite of mitigation and monitoring measures (Chapter 9. Paras 9.211-9.244) to ensure that biodiversity would not be negatively affected. Table 9.1 of the Langford Bridge ES demonstrates that there would be negligible through to moderate residual beneficial effects on biodiversity with a minor moderate beneficial (significant) effect on bats.
- 5.1.5 Given: the relatively small additional land area within the Langford Bridge application; the lack of noteworthy biodiversity features, including bats, within the additional land parcel; and the residual effects reported within the Langford Bridge ES, the assessment of cumulative effects would not change as a result of the additional land parcel. There would not be a significant adverse, cumulative impact on the valued receptors (VERs), and that there will be a positive cumulative impact in terms of the habitat enhancement and creation associated with the proposed developments (Wolborough ES Volume 2, para 8.8.9).

## **6.0 Cultural heritage update**

6.1.1 Section 9.3 of the ES was informed by three assessments of the historic environment which were undertaken to inform the assessment of impacts set out in the chapter:

- Heritage Appraisal & Impact Assessment (April 2017) (ES Technical Appendix 9.1)
- Wolborough Barton, Newton Abbot, Devon: Historic Environment Assessment (HEA), A C Archaeology Ltd, December 2016 Heritage & Impact Assessment (April 2017) (Technical Appendix 9.2); and
- Land at Wolborough Barton, Newton Abbot, (GS) Substrata Archaeological Geophysical Surveyors, June 2016 (Technical Appendix 9.3).

6.1.2 The HEA considered all designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Battlefields, Parks and Gardens) along with non-designated heritage assets (archaeological sites and finds, historic buildings, other landscape features or locally designated features or areas of cultural heritage importance). In view of the size and shape of the development area, a study area of 500m distance from the edges of the application area boundary was used, however, where appropriate nearby assets and archaeological sites outside of the study area were also considered (ES paragraph 9.3.3). Paragraphs 9.4.5 – 9.4.7 and Table 9.1 of the ES set out the designated and non-designated heritage assets considered.

6.1.3 As per the comments provided at paragraph 9.8.1 of the ES, Volume 2, the development would be considered to have the potential to have some impact on unknown buried archaeological remains. However, in each case, appropriate further investigation and mitigation would be secured through the planning process to ensure that impacts are limited. There is therefore a negligible cumulative effect in terms of unknown buried archaeological remains.

- 6.1.4 The designated heritage assets in closest proximity to the Langford Bridge Farm site are Langford Bridge (Grade II) and St Augustine's Priory (Grade II\*). The Heritage Appraisal and Impact Assessment (Technical Appendix 9.1) for the appeal proposals considered that the development would have no impact on the setting of Langford Bridge and low impact on the setting of St Augustine's Priory (Section 1.8.2, Technical Appendix 9.1) due to the lack of inter-visibility. As such, the Langford Bridge proposals would not result in a significant cumulative impact on these heritage assets.
- 6.1.5 Developments will be required to implement site specific mitigation measures to reduce impacts on setting of heritage assets.
- 6.1.6 The proposals at Langford Bridge Farm would not change, in any significant way, the assessment and conclusions set out in the ES.

## **7.0 Traffic and transport update**

- 7.1.1 In terms of the construction phase, the ES identified that there is the potential for some of the schemes identified to be constructed at the same time and therefore lead to a cumulative effect in terms of construction traffic on the local highway network. It will therefore be necessary for the LPA and County Council to appropriately manage and coordinate construction traffic by way of the Construction Environmental Management Plans (CEMPs) which are required to be submitted and agreed before any development can commence on the relevant sites.
- 7.1.2 With regards to the operational phase, the full NA3 allocation together with the additional development proposed at Langford Bridge Farm, would result in similar flows through the town to that already assessed in the Transport Assessment (see ES Technical Appendix 10.1) for Phases 1, 2 and 3 with the Spine Road connected between the A381 and Kingskerswell Road.
- 7.1.3 The only change of any magnitude would be to increase queuing at the southern end of Kingskerswell Road (where a new rail bridge is proposed by Devon County Council which will be funded by CIL payments).
- 7.1.4 The number of vehicles generated by an additional 150 residential units proposed at Langford Bridge Farm would not be so significant to alter the conclusions set out in the ES and subsequent ES Addendum.

## **8.0 Water resources, flood risk and drainage**

- 8.1.1 The consideration of cumulative effects in relation to water resources, flood risk and drainage was set out in section 11.8 of the ES, Volume 2.
- 8.1.2 As with the appeal proposals and other developments identified in Table 11.4 of the ES (which included the remainder of the Wolborough allocation), the proposed development at Langford Bridge would involve a range of necessary measures and an appropriate drainage strategy to ensure that no adverse impacts will result.
- 8.1.3 All of the developments considered in table 11.4 of the ES, Volume 2, were expected to result in a negligible to minor negative cumulative effect on the water resources or flood risk in the local area (paragraph 11.8.4 of the ES, Volume 2). This is because none of the developments were considered to result in significant adverse effects individually and they will all be required to implement appropriate drainage strategies and mitigation measures where necessary to ensure their impacts are minimal, controlled and reduced.
- 8.1.4 Compliance with government planning policy and EA guidance ensures that the significance of the residual effects of new developments on surface water and flood risk is minimised. This is achieved through the application of suitably designed surface water drainage systems whilst adopting SuDS principles.
- 8.1.5 The proposed development at Langford Bridge Farm would not alter the conclusions set out in section 11.8 of the ES.



## **9.0 Dust and air quality**

- 9.1.1 The development area is located within and beyond the southern area of the NA3 allocation, therefore the majority of vehicles generated as part of this proposal would impact road links to the south and east of the Wolborough area, such as the South Devon Expressway and Kingskerswell Road.
- 9.1.2 The number of vehicles generated by the proposed development at Langford Bridge Farm, would not be significant in terms of air quality along these road links, given that air quality is comfortably meeting the relevant air quality objectives along these road links (as indicated by the monitoring carried out along Torquay Road) and in the vicinity of the development.
- 9.1.3 The additional development comprised in the planning application at Langford Bridge Farm, would not result in a change to the conclusion of the air quality assessment set out in the ES addendum (December 2017).

## **10.0 Ground conditions**

- 10.1.1 An assessment of ground conditions and potential contamination is set out in Section 13 of the ES, Volume 2, based on information derived from a Phase 1 Desk Study and Walkover Survey and a Phase 2 Preliminary Intrusive Ground Investigation (ES Volume 3, Technical Appendix 13.1).
- 10.1.2 The indicated ground conditions for the Langford Bridge Farm site are essentially as per those identified in the work for the wider NA3 area. As such, the proposals for Langford Bridge Farm do not affect the previous conclusions set out in the ES.

## **11.0 Noise**

- 11.1.1 The ES Addendum dated January 2019 considered the potential noise impacts and likely effects of the proposed development. Section 8.0 of the ES Addendum (January 2019) provided an assessment of the potential for cumulative effects of a number of major projects within the Newton Abbot area.
- 11.1.2 With regards to the remainder of the NA3 Wolborough allocation, the assessment considered there to be potential for cumulative effects to arise during construction and once operational. As with the appeal proposals, it is expected/ assumed that the development of the allocation will involve a range of necessary mitigation to ensure that adverse impacts will be avoided, minimised and reduced.
- 11.1.3 In terms of the construction phase, there is the potential for the appeal proposals to be constructed at the same time as the remainder of the allocation and therefore lead to cumulative effects. It will therefore be necessary for the LPA and developers to appropriately manage and coordinate the developments and put in place Construction Environmental Management Plans.
- 11.1.4 In terms of operational noise; due to the low impact nature of the appeal proposals, cumulative operational noise impacts are considered to be limited to road traffic noise only (which cannot be mitigated).
- 11.1.5 The traffic noise impacts arising as a result of the development proposed at Langford Bridge Farm, will not give rise to any change in the conclusions set out in the previous noise assessment report.

## **12. Conclusion**

- 12.1.1 The effect of the variation between the submitted proposals at Langford Bridge Farm, and the proposals already assessed in the ES process, are not of a scale that give rise to any different conclusions to that already reached, for the reasons set out in this addendum.