

LRE/957/62-X - Letcombe Laboratory

Re-development for residential (class C3) use, provision of a retail unit (class A1) and/or locum health facility (class D1) in the Lodge. Rearranged access, car parking, landscaping and ancillary development.

Letcombe Laboratory, Letcombe Regis, Wantage

LRE/957/63-CA – Letcombe Laboratory

Demolition of all buildings except The Lodge

Letcombe Laboratory, Letcombe Regis, Wantage

1.0 The Proposals

- 1.1 Outline planning permission is sought for the erection of 99 dwellings at Letcombe Laboratory, Letcombe Regis, the former Dow AgroSciences site. The application is in outline but the only matter reserved for future consideration is landscaping. This means that the details submitted in respect of siting, design, external appearance and access can all be considered in full at this time. The application site lies within the Letcombe Regis Conservation Area and is situated within the North Wessex Downs Area of Outstanding Natural Beauty. The Parish Church opposite the site entrance is a Grade II* Listed Building.
- 1.2 The conservation area consent application proposes the demolition of all buildings on the site with the exception of the thatched Lodge opposite the Church. 99 dwellings are proposed to replace the existing buildings, comprising 14 x 2-bed flats, 28 x 2-bed houses, 36 x 3-bed houses, 14 x 4-bed houses and 7 x 5-bed houses. The units will be provided in one apartment block, and a number of terraces and detached plots. Overall the scheme provides 11,459 sq.m of residential floorspace. It is proposed that The Lodge is to be used as a retail unit/locum health facility. Nine affordable dwellings are proposed, to be provided on the site with a commuted payment for the additional 16 units.
- 1.3 Vehicular access into the site is via the existing access adjacent to the Lodge. Layout plans and extracts of the proposed elevations are attached at **Appendix 1**.
- 1.4 The site currently contains approximately 12,000 sq. m of Class B1 (office/research and development) floorspace which has lain vacant for approximately 4 years. The existing buildings on the site include an extended former private 'Manor' house, a converted stable block, post-war laboratory buildings, glass houses and other research and development buildings. All the buildings on the site, with the exception of the former stables and the Lodge, have conservation area consent to be demolished.
- 1.5 The application has been submitted with a number of supporting reports including a Transport Statement, Ecology Survey, tree survey, design statement and archaeological assessment. All of these are available to be viewed on the planning file. The application covering letter setting out the applicant's case is attached at **Appendix 2**.

2.0 Planning History

- 2.1 The site has been the subject of over 60 applications but the bulk of these were made in connection with the previous employment use of the premises.
- 2.2 In August 2003 a full planning application was received for the redevelopment of the site for residential purposes. This included the conversion of the former stables building and the use of the Lodge as incidental office space. A total of 44 dwellings were proposed comprising 28 houses and 16 apartments. In March 2004, Committee resolved to grant permission for the development and the application was referred to the Secretary of State as a departure from the Development Plan and from the Residential Density Directive. The Secretary of State called-in the application on 11 May 2004 and an Inquiry date was set for 15 March 2005. However, prior

to the Inquiry, the application was withdrawn on 26 January 2005. A copy of the layout plan for the 44 dwellings is attached at **Appendix 3**.

- 2.3 An application for Conservation Area consent to demolish all the buildings on the site, apart from the stable block and the Lodge, was also considered by Committee in March 2004. Members resolved to grant consent for the demolition, but the formal decision was not issued pending the call-in appeal. The decision notice was issued earlier this year after the planning application was withdrawn.

3.0 **Planning Policies**

Adopted Local Plan

- 3.1 The application site is located within a Conservation Area adjacent to a Grade II* listed building and within an Area of Outstanding Natural Beauty. Historic Environment Policies HE1, HE2, HE5, HE6, HE9, HE15 and Countryside Policy C2 of the adopted Local Plan are therefore relevant.
- 3.2 Housing Policy H5 states that development in villages such as Letcombe Regis should be limited to infilling and minor development, the scale, layout and density of which should be compatible with the size, form and character of the village. Policy H3 requires that for developments over 25 dwellings, an element (25%) of affordable housing should be provided.
- 3.3 Policy NC2 relates to Nature Conservation and states that development which would result in harm to protected species should not be permitted unless these damaging impacts can be satisfactorily mitigated.

Deposit Draft Local Plan

- 3.4 Draft Historic and Environment Policies HE1, HE2 and HE5 reiterate the need to preserve or enhance the character or appearance of conservation areas and preserve the setting of listed buildings.
- 3.5 General Strategy Policies GS1, GS2, GS7 and GS11 set out the framework for the provision of sustainable patterns of new development within the District, concentrating the majority of new development in the principal settlements. Housing Policy H11 requires development in villages such as Letcombe Regis to be limited to sites suitable for not more than 1 or 2 dwellings. Policy H8 currently identifies the application site for residential development for an estimated 44 dwellings. However, at the Local Plan Inquiry, Officers requested that the Inspector consider deleting this Policy in its entirety or reducing the allocated site area to one which would allow no more than 44 dwellings on the site. The Inspectors report is due in January 2006. Policy H16 requires that 50% of dwellings on development sites of over 4 dwellings to be affordable.
- 3.6 Policy NE5 reiterates adopted Policy NC2 in respect of the protection of protected species on development sites.

Oxfordshire County Structure Plan 2016

- 3.7 General Policy G1 seeks to concentrate development in sustainable locations, making use of previously developed land and in rural areas, provide limited development to support local communities. Policy G2 requires new development to be of an appropriate scale and type and be designed to reduce the need to travel. Policy G3 requires that new development be served by adequate infrastructure and other facilities.
- 3.8 Housing Policy H1 sets out the countrywide strategy for the location of new housing and states that in small settlements and villages housing development should be limited to that required to meet local needs and support balanced communities.

Central Government Policy

3.9 PPS1, PPG3, PPS9, PPG13 and PPG15 are relevant to the consideration of this application. PPS1 (Delivering Sustainable Development) sets out the importance of providing new sustainable development. Paragraphs 30 and 31 of PPG3 (Housing) set out the criteria under which housing sites should be identified in local plans. Paragraph 41 of PPG13 (Transport) requires previously developed land in rural areas to be evaluated against paragraphs 30 and 31 of PPG3 and states that the availability of previously developed land is not, in itself, a sufficient reason for developing in such locations. Paragraphs 15 and 16 of PPS9 (Biodiversity and Geological Conservation) sets out the requirement for local authorities to set out specific policies for the protection of protected species and their habitats in their local plans and that development which harm species and habitats should be resolved unless the need for the development outweigh that harm. PPG15 provides guidance on the quality and appropriateness of new development in Conservation Areas and that which affects the setting of listed buildings.

4.0 Consultations

4.1

- Letcombe Regis Parish Council – object. See the letters at **Appendix 4**.
- Oxfordshire County Planning – object. See **Appendix 5**.
- County Engineer – objects. See **Appendix 6**.
- Environmental Agency – object to proposed development on the grounds that the application may present a significant flood risk from surface water run-off. A flood risk assessment is therefore required.
- Environmental Health – any planning permission should include a contaminated land condition.
- County Archaeologist – recommends a pre-determination archaeological field evaluation.
- County Ecologist – main issues relate to bats and badger species. Applicant would need to submit a mitigation strategy to be agreed by English Nature and licensed by Defra in advance of any planning permission.
- Thames Water – Require Impact studies of existing water infrastructure and impact study of new development. The existing water supply infrastructure has insufficient capacity. Suggest condition of the required studies.
- The Letcombe Conservation Group – See attached comments at **Appendix 7**.
- The Letcombe Brook Officer – objects. See **Appendix 8**.

4.2 105 letters of objection (4 of which include objections to 63/CA, plus an additional 5 specifically objection to the proposed demolition) which are summarised as follows:

- Development contrary to development plan policies and PPG3. The site is not a sustainable location for such a development.
- Development would result in a 47% increase in the size of the village and the central community by more than 50%.
- Access roads to and within the village are very narrow and dangerous. Extra traffic resulting from the development will lead to further hazards for vehicles, pedestrians and horse riders. Existing infrastructure is not capable of taking this level of development.
- Development has no empathy with the village and is disproportionate and totally inappropriate in size and scale for a village of only 212 houses. This scale of new residents could not be integrated into the local community and will swamp the village.
- The height, size and design of development does not reflect the architectural style of the village and fails to preserve or enhance the character of the Conservation Area and Area of Outstanding Natural Beauty as it would be more visible in the local and wider landscape because of the regrading of land on the site.
- Such a dramatic increase in the population would overwhelm the community and could not be absorbed.
- Proposal represents an urban uniform development out of character with the form of this rural village. The design does not even attempt to integrate into the village.

- Objection to the loss of the Manor House and stable block which are part of the village's history and identity.
- The village is not a sustainable location for this scale of development. It has no facilities or services other than one public house and the scale of this development would not sustain new facilities. Existing bus services are very limited.
- Development would be a burden on the village's existing infrastructure and sewerage system.
- Development does not meet affordable housing needs and this development would add to that genuine need. In reality, need is always greater than that which should be catered for (25%) including homes for the elderly.
- Development will cause congestion around the Church.
- The 450 population of the village could be doubled by the development.
- Some growth in the village is to be supported but not of this scale.
- Loss of amenity to those properties fronting and abutting the existing village roads by virtue of increased traffic.
- Significant housing growth is proposed at Grove and consequently there is no need for this scale of development in Letcombe Regis.
- The development would be visible from the Ridgeway.
- There are bats on the site and the Letcombe Brook is home to protected species and habitats.
- Proposed Locum doctor's surgery would be unviable.
- Letcombe Regis obviously has very limited services but so does Wantage. This development in addition to that in Wantage and Grove will put a strain on Wantage infrastructure.
- Recent appeal case stated that the village should not increase by more than 10-12%.
- Scheme does not provide for any maintenance of the lake.
- Loss of residential amenity with the replacement of buildings in north-west corner of the site. This part of the site also comprises greensand, which could be destabilized as a result of the development causing subsidence to surrounding properties.
- Objection to the removal of any trees.
- Filling in of earth bund will make the development more visible.

4.3 Two letters of support - in principle, it is considered that the development will be good for the village.

5.0 **Officer Comments**

5.1 The main planning considerations of these applications are considered to be:

- i) The principle of residential development on the site in the light of central government advice and development plan policies;
- ii) The scale of the development in the context of Letcombe Regis;
- iii) The design and layout of the scheme and its impact on the character of the Conservation Area and Area of Outstanding Natural Beauty;
- iv) The impact of the development on the local highway network;
- v) The impact of the development on protected species and habitats;
- vi) The provision of affordable housing on the site;
- vii) The impact of the development on adjacent residential properties;
- viii) The demolition of the stable building.

Principle of Residential Development

5.2 The application site is previously developed land (PDL) and it is central government policy that such sites should be re-developed for housing rather than developing green field sites. However, the selection and appropriateness of PDL for housing is required to be considered against criteria set out in PPG3 which refers to issues such as the location and accessibility of sites, the capacity of existing and potential infrastructure to support new development and the

ability to build communities. As stated above, PPG13 also states that the availability of PDL is not, in itself, a sufficient reason for developing land in rural areas.

- 5.3 In respect of the policies within the development plan, these require developments of the scale proposed to be located in the most sustainable locations within the District, i.e. the larger towns. Policy H8 does allocate the site for residential purposes but for a significantly smaller number of dwellings. It should also be borne in mind that the Local Plan Inspector in his forthcoming report may recommend that this policy is amended or deleted in full. As such, little weight can be given to it at this time.
- 5.4 The 2003 planning application for 44 dwellings was never formally determined and there is, therefore, no extant permission for residential development on the site. Whilst the Council did resolve to permit that application, it is clearly materially different from the current proposal.
- 5.5 It is your Officers opinion, supported by the County Planning Officer, that the proposal fails to comply with PPG3, PPG13 and the policies contained in the adopted and emerging development plan. Letcombe Regis is not a sustainable location for this scale of development, having no facilities other than the Parish Church, the village hall and one public house. Wantage is 2 miles from the village, and the public transport services which do exist would not be sufficient to avoid new residents relying on the private car.
- 5.6 The applicant has argued that the peak hour traffic generated from the 99 houses would be less than the traffic generated by the previous use of the site. However, traffic movements are not the only measure of sustainability and the likely traffic movements from the site are disputed by the County Engineer.

Scale of Development

- 5.7 The 2001 census identified 217 households in the parish of Letcombe Regis with a total population of 548. This application for 99 dwellings would increase the size of the village by almost 50%. The scale of such a residential extension to a small village with few amenities is considered to be disproportionate in size and totally unacceptable. Officers share the concern expressed by the Parish Council and local residents that such a large number of new dwellings and households could not be satisfactorily assimilated into the physical and social fabric of the village. The village's infrastructure is incapable of meeting the needs of this amount of new housing.

Design and Layout and Impact on Conservation Area and Area of Outstanding Natural Beauty

- 5.8 The application site is located in an environmentally sensitive location within a Conservation Area and an Area of Outstanding Natural Beauty. However, the site is well screened with thick vegetation on its boundaries, allowing few public views in. When originally submitted, the application proposed the removal of the dense, mostly evergreen hedge on boundary with South Street. This would have opened up public views of the new development. It would also have altered the rural character of South Street and thus, in your Officer's opinion, would have failed to preserve or enhance the character or appearance of the conservation area. To overcome these concerns, the applicant has confirmed that this boundary treatment will be retained. Clarification has also been provided in relation to the south eastern corner of the site. This area which was previously excavated to accommodate glasshouses and other buildings, will be raised by no more than 1 metre above the now existing ground levels and, as such, is unlikely to have a marked impact on the visibility of the scheme from adjoining roads and footpaths. Having said this, the proposal to provide a footpath link beside the lake would open up views of the development to the public.
- 5.9 In respect of the form of the development, Officers are concerned that the proposal has an urban character and layout, which is out of keeping with the existing rural form of the village. Similarly, it is considered that the proposed dwelling types and the size of some of the units fail to reflect the vernacular traditions of the village. Whilst certain elements of the design have

been taken from the previous application for 44 dwellings on the site, in particular the replacement 'Manor House' building, the change in layout and higher density now proposed means that the loose-knit 'node farm' approach of the 2003 scheme has been lost. The proposed layout is more closely associated with more modern developments on the outskirts of the village, which fall outside the boundaries of the Conservation Area, rather than reflect the village's historic core to which the site is most closely related.

- 5.10 Another issue to be considered in respect of the Conservation Area is the impact of the additional traffic which will be created by the proposal. Whilst the Letcombe Manor site has an established Class B1 use, the site has been empty for a number of years and there is no guaranteed prospect that a new Class B1 user on the site would maximise the accommodation on the site and thus maximise traffic movements. The impact of the additional traffic generated from 99 dwellings could, therefore, have a significant impact on the existing tranquillity, character and appearance of the area.
- 5.11 With regard to the site's location within the North Wessex Downs Area of Outstanding Natural Beauty, it is acknowledged that the site can be seen from the Ridgeway which is approximately 2150 metres (1.5 miles) due south. However, because of the site's location within the village against the backdrop of existing buildings, the minimal raising of land levels to the south of the site, and the retention of important trees on the site, Officers do not consider that the development will have a significant harmful effect on the natural beauty of the Area of Outstanding Natural Beauty.

Local Highway Network

- 5.12 The County Engineer has expressed concern that an intensification of use of the sub-standard roads leading to the site would not be in the interests of highway safety. This is based on the width of local roads, the visibility at the junction of the site access road and Main Street/South Street and an increased number of movements to the site, over and above the permitted use (as mentioned above, this issue is disputed by the applicant). The roads leading to the site are narrow and winding with no street lighting and it is understandable why any increase in traffic movements is undesirable. This concern has also been raised by the Parish Council and many local residents.

Protected Species and Habitat

- 5.13 The Letcombe Brook runs both beside and within the application site. The comments of the Letcombe Brook Officer are attached at **Appendix 8**. The comments of the County Ecologist have also been received and this identifies the main ecological issues on the site, as being the presence of protected species and in particular, bat and badger species. To address this issue a mitigation strategy would need to be agreed by English Nature and licensed by DEFRA in advance of any planning permission being granted. Whilst this may be achievable, no mitigation scheme has been submitted and it has not therefore been demonstrated that such a scheme would be acceptable to English Nature.

Affordable Housing

- 5.14 The provision of affordable housing is one of the Council's priorities. The application originally proposed 9 affordable units on the site to meet local housing need. This number fell well short of the 25% required by the adopted Local Plan and the 50% recommended in the Second Deposit Draft Local Plan. The applicant has reconsidered this issue and is now proposing 9 dwellings on the site with a commuted payment in lieu of the additional 16 dwellings.
- 5.15 On the basis of demand from locals and the general register for the village, the Council's Housing Development Officer would require a minimum of 18 units to be provided on the site with any units over and above this converted to a commuted sum. The applicant's comments on this are awaited.

Adjoining Residential Properties

- 5.16 The proposed development will have an impact on the character of the area and how the site is perceived by neighbouring properties. However, in general, the development is not considered to have a harmful impact on the residential amenities of adjacent properties, with the exception of No 2 Letcombe Estate, a semi-detached dwelling situated adjacent to the north western corner of the site. The rear garden of this property shares its western boundary with an existing single storey mono-pitched building which is to be replaced with a new garage and flat block. The new building is 8.5 metres high and because of its height and length will have a significantly domineering and harmful impact on the garden area of the adjacent house to the detriment of its residential amenities.

Demolition of the Stable Building

- 5.17 The Conservation Area Consent application involves the demolition of a traditional converted stable block on the site, which was proposed to be converted as part of earlier application in 2003. Whilst the loss of this building is regrettable, Officers do not feel that there are justifiable grounds for refusing this element of the proposal because it can only be considered in the context of the impact its demolition would have on the character and appearance of the Conservation Area. The principal reason for this is because the stable building is not publicly visible within the Conservation Area and is not worthy of listing in its own right. As such, its demolition is difficult to resist. However, should consent be granted, it is recommended that an Informative be added in respect of the 'protected' species on the site.

Other Issues

- 5.18 As referred to in Section 4 above, the Environment Agency objects to the application on the grounds that a flood risk assessment has not been submitted. The applicant believes this objection can be overcome and is in negotiations with the Environment Agency. An update on this issue will be given at the Meeting.

Conclusion

- 5.19 The application for 99 dwellings has been made in order to meet the Government's Density Directive on a previously developed site. Had the application site been situated within or on the edge of Wantage, or one of the Districts other large settlements, consideration of this proposal would have been materially different. However, the application site is located on the edge of a small village of just over 200 houses which has little or no services or facilities and which is accessed by substandard roads. Your Officers consider that notwithstanding emerging Policy H8 of the Second Deposit Draft Local Plan, the development is contrary to national, Structure Plan and Local Plan policies and represents an unsustainable form of development totally out of scale with the existing village. The development also has a detrimental impact on the character and appearance of the Conservation Area.
- 5.20 In addition to this there are also objections about the proposal in respect of its impact on an adjacent property, flooding issues, highway concerns and the issue of protected species on the site. There may also be a reason for refusal relating to the provision of affordable housing on the site.

6.0 Recommendation

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- 6.1 *It is recommended that the application be refused on the following grounds:*

1. *Letcombe Regis is a small village of 217 households with very limited community services or facilities. The proposed redevelopment of the Letcombe Manor site with 99 dwellings would result in an incongruous, inappropriate and unacceptable increase in the size of the village*

by almost 50%. It would also result in the provision of a significant amount of new housing in an unsustainable rural location. The proposal is therefore contrary to Oxfordshire Structure Plan Policies T1, G1, G2, G3 and H1; Policy H5 of the adopted Vale of White Horse Local Plan; Policies GS1, GS2, GS7, GS11, DC1 and H11 of the Second Deposit Draft Local Plan and Government advice contained within PPS1, PPG3 and PPG13.

2. The rural highway infrastructure leading to the site is substandard and is therefore unsuitable to serve the additional traffic which would be generated by the proposed development. The proposal is therefore contrary to Policy T8 of the Oxfordshire Structure Plan; Policy D3 of the adopted Vale of White Horse Local Plan; Policy DC5 of the Second Deposit Draft Local Plan and the advice contained within PPG13.
3. The application site is situated within the Letcombe Regis Conservation Area. The proposed development by virtue of its scale, height, density, layout and design will have a harmful impact on the character of the area and will fail to preserve or enhance the character or appearance of the Conservation Area. The proposal therefore fails to comply with Policy HE1 of the adopted and Second Deposit Draft Local Plans and the advice contained within PPG15.
4. The site is located in Flood Zone 1. Whilst the site is outside the floodplain, development of this size can generate significant volumes of surface water. The proposal may, therefore, present a significant flood risk which cannot be fully assessed without a Flood Risk Assessment. As no such assessment has been submitted, the applicant has failed to demonstrate that the development will not cause a flood risk and the proposal is therefore contrary to the advice contained within PPG25; Policies D16 and D17 of the Adopted Local Plan and Policies DC13 and DC14 of the Second Deposit Draft Local Plan.
5. On the basis of the submitted information, the applicant has failed to demonstrate to the District Planning Authority that a satisfactory mitigation scheme can be agreed with English Nature to ensure that the development will not have a damaging impact on the protected species found within the site. The proposal is therefore contrary to the advice contained within PPS9 and Policy NC2 of the Adopted Vale of White Horse Local Plan and Policy NE5 of the Second Deposit Draft Local Plan.
6. The application proposes the replacement of an existing single storey mono-pitched implements building on the north western corner of the site with an 8.5 metre high block of garages with flats above. This building will abut the rear garden of No. 2 Letcombe Estate and will result in an over-bearing and domineering form of development that will significantly reduce the residential amenities currently enjoyed by this property. The proposal therefore fails to comply with Policy D2 of the adopted Vale of White Horse Local Plan and Policy DC9 of the Second Deposit Draft Plan.

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6.2 It is recommended that the application be permitted subject to the following condition and informative:

1. TL4 – Time Limit Conservation Areas

Informative

The applicant's attention is drawn to the fact that there are protected species on the application site that will be affected by the demolition of the stable block. It will therefore be necessary for the applicant to agree a satisfactory mitigation strategy for the protection of these species with English Nature and seek any necessary licenses from DEFRA before any works commence to demolish this and any other affected building on the site.