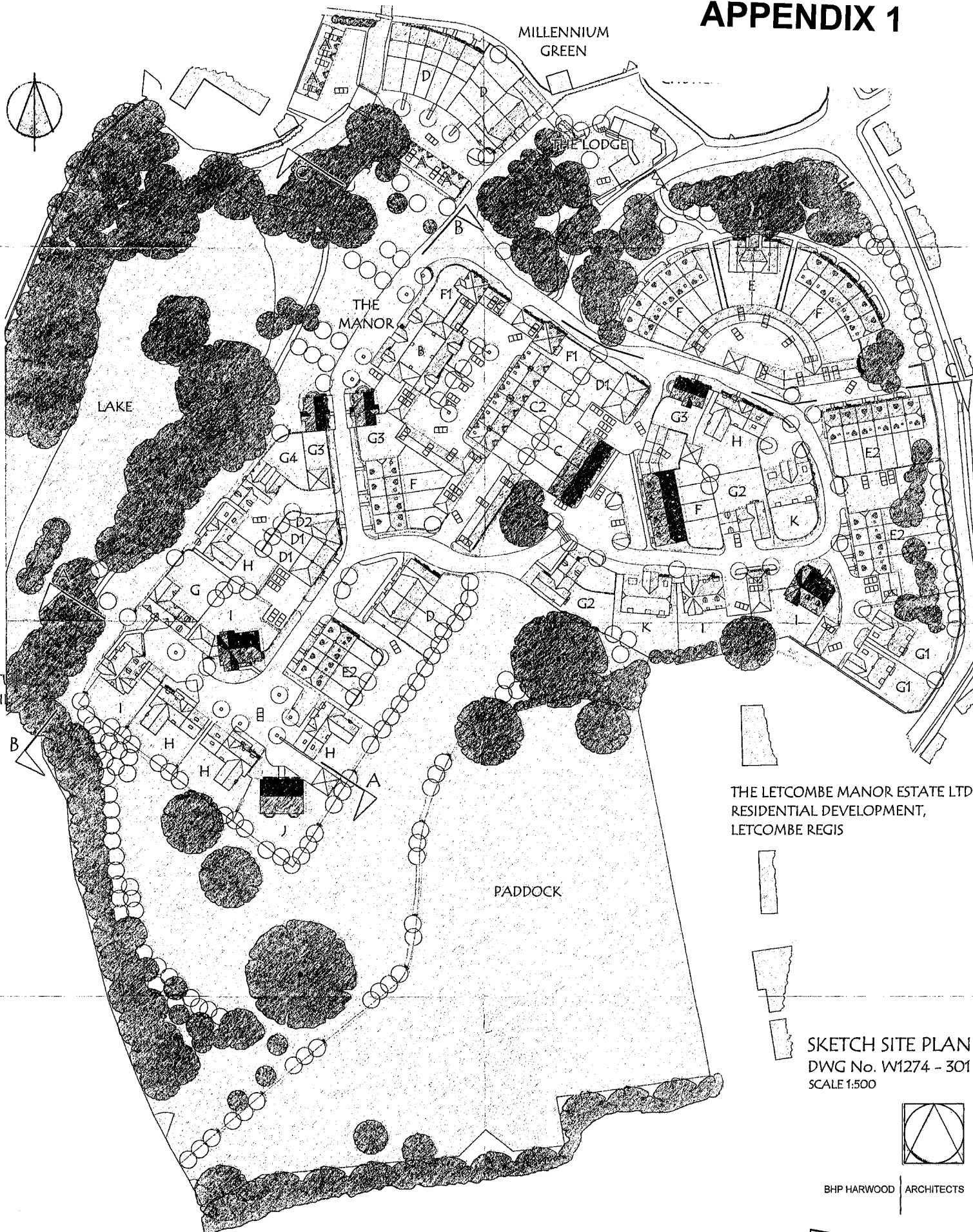


APPENDIX 1



THE LETCOMBE MANOR ESTATE LTD
RESIDENTIAL DEVELOPMENT,
LETCOMBE REGIS

SKETCH SITE PLAN
DWG No. W1274 - 301
SCALE 1:500

BHP HARWOOD ARCHITECTS

VALLEY OF WHITE HORSE
DISTRICT COUNCIL
33 AUG 1998
CORPORATE POSTAL
SERVICES

APPENDIX 1



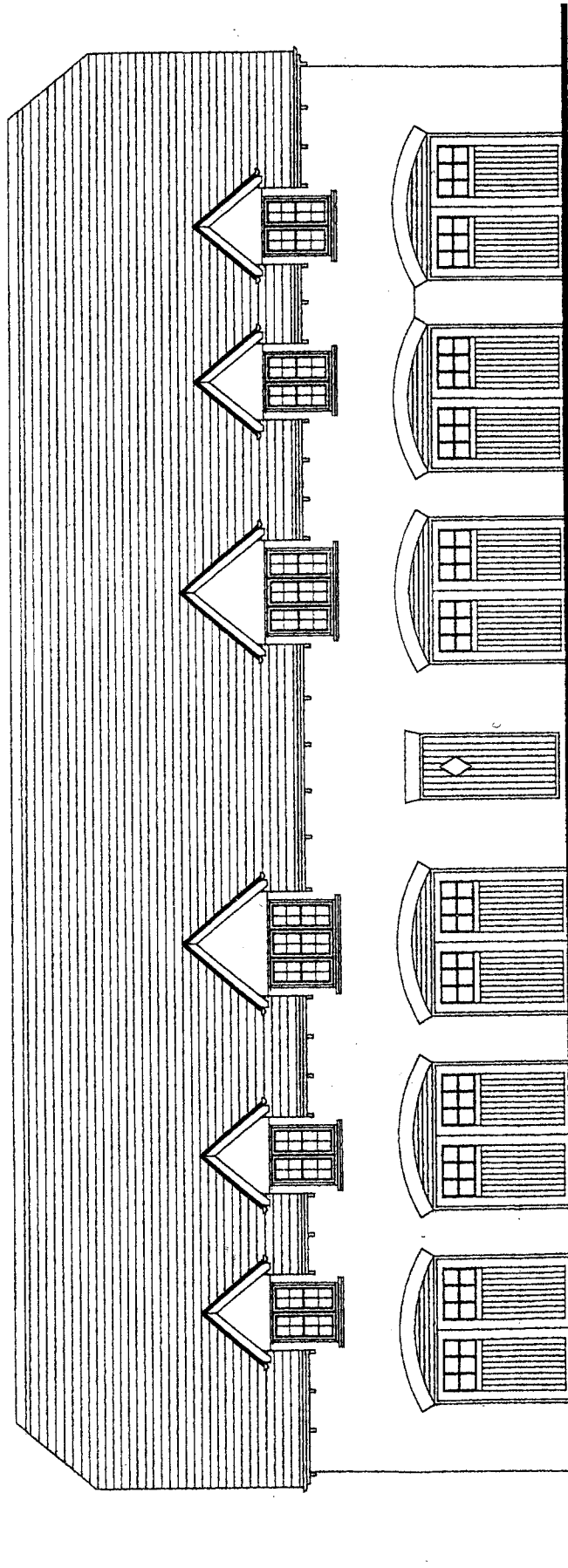
FRONT ELEVATION

APPENDIX 1



FRONT ELEVATION

APPENDIX 1



FRONT ELEVATION

APPENDIX 1



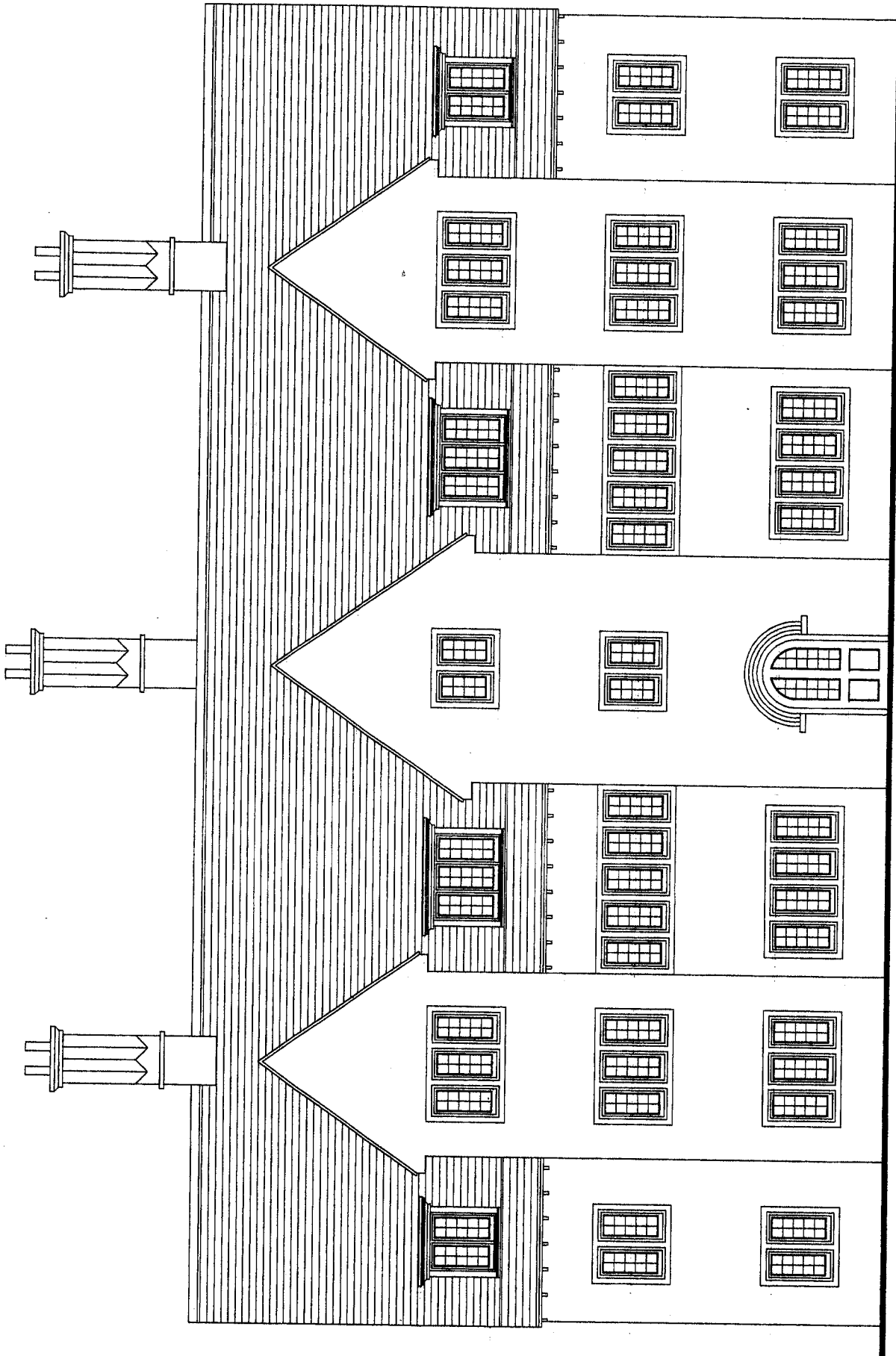
FRONT ELEVATION



APPENDIX 1



FRONT ELEVATION



FRONT ELEVATION

TYPE B 2 bed apartments

1.0 Planning Application Site and Surrounding Area

- 1.1 An outline planning application with access to be determined is submitted on behalf of the site owners, The Letcombe Manor Estate Limited (LMEL). The planning application site is part of the former Dow AgroSciences (Dow Agro Site) research and laboratory establishment located off Bassetts Road Letcombe Regis. The Dow Agro Site lies in a central location within the village of Letcombe Regis and to the south of the Parish church.
- 1.2 The Dow Agro Site totals 14.7 ha in size and was formerly used as an agricultural scientific research centre. A number of buildings occupy the site, including an extended former private dwelling, a lodge, stables, offices, laboratory buildings and greenhouses. The existing permitted buildings amount to 12,379 sq m of floorspace equivalent to 9,181 sq m of footprint. There are a variety of mature trees on site and a small lake is located to the west of the site.
- 1.3 Dow AgroSciences vacated the site in 2002 and it remains unoccupied.
- 1.4 The planning application site area is 4.9 hectares and primarily constitutes the previously developed part of the Dow Agro Site, as defined within the emerging draft Vale of White Horse Local Plan Second Deposit Draft June 2004.

2.0 Planning History

- 2.1 In its former use, the Dow Agro Site was the subject of a vast number of planning applications relating to extensions and alterations to buildings.
- 2.2 In August 2003, following their vacation of the site, Dow AgroSciences Ltd submitted a planning application for residential redevelopment comprising 44 dwellings. The Vale of White Horse District Council resolved, on 1st March 2004, to grant planning permission the proposed residential development.
- 2.3 As the planning application proposed a density of 15 dwellings per hectares the application was referred to GOSE under the Town and Country Planning (Residential Density) (London and South East England) Direction 2002. GOSE confirmed on 11 May 2004 that the application should be called in for determination by the First Secretary of State.
- 2.4 Dow AgroSciences Ltd subsequently withdrew the application on 26th January 2005.
- 2.5 Savills submitted on 7th June 2005, on behalf of LMEL, an Environmental Impact Assessment (EIA) Screening Opinion Request with respect to residential development on the Dow AgroSciences site. Mrs Geraldine LeCointe of Vale of White Horse District Council confirmed that an EIA was not required by letter dated 15th August 2005. A copy of this letter is attached as Appendix 1.

3.0 Description of Proposal

- 3.1 This statement supports the following two applications:
- (i) Outline planning application for the redevelopment of the site for residential purposes including the demolition of all buildings except the Lodge, change of use of the Lodge to retail and/or locum health facility, rearranged access, car parking landscaping and ancillary development.
 - (ii) Application for Conservation Area Consent for demolition of all buildings, except the Lodge.

- 3.2 Whilst the planning application is in outline form, detailed illustrative plans are provided to demonstrate how the redevelopment of the site can take place to address national and local planning policies.
- 3.3 The indicative illustrative layout plan demonstrates that 99 dwellings can be accommodated on the site. This layout accords with PPG 3 Housing (2000) paragraph 58 density guidance for the efficient use of land at minimum densities of 30 dwellings per hectare.

4.0 Accompanying Reports

- 4.1 This planning statement is supported by the following accompanying reports:

(a) Transport Statement by WSP

The TA highlights that despite its rural location, Letcombe Regis has a relatively high level of bus accessibility. The impact of the forecast development traffic on the surrounding road network has been assessed and found to have no adverse impact on the operation of the local roads and junctions in the vicinity of the site.

(b) Ecology Survey by Ecosulis Ltd.

This Phase 1 Habitat Survey (including bats and badgers) is the result of a desktop study and field survey of the site. It highlights that the majority of the area is highly modified by man and has limited potential value. The ecological interest of the site is related to the presence of buildings that contain bat roosts, the presence of an inactive badger sett and as a foraging resource for local wildlife. The makes recommendations as to how the proposed development might be managed to minimise its effect upon the ecological interest of the site.

(c) Arboricultural Assessment by Ecosulis Ltd.

This assessment explains that the proposed development will have little or no impact upon the trees within the most significant retention category. It states that the large nature of the site and the localised nature of the proposal (within the existing built footprint) decreases the potential development pressure on trees. Any pressure may be mitigated for adequately with appropriate landscape provision, sensitive design and the implementation of tree management techniques.

(d) Design Statement by BHP Harwood

This statement lists the logic behind the chosen design, incorporating the site constraints, the design principles and architectural style. The design concept for the site is to provide a development that echoes as closely as possible the grain of the existing village. The statement concludes that the design responds to the historic and sensitive character of the site and surrounding area.

(e) Ground Investigation by RSA Geotechnics Ltd.

This investigation found no barrier to residential development on the site. In particular, it noted that only very little remediation is required with respect to chemical contamination of the site.

(f) Archaeological Impact Assessment by Museum of London

This assessment concludes that the site lies in an area of medium to low archaeological potential. It recommends that an appropriate planning condition is imposed on any subsequent planning permission requiring archaeological investigation prior to implementation of the consent.

(g) Architectural Appraisal by Aukett Fitzroy Robinson

The appraisal considers the architectural merit of the Manor House and Stable Block. It concludes that neither building is worthy of retention.

5.0 Relevant Planning Policy

i) National Planning Policy

- 5.1 PPS 1 (Delivering Sustainable Development) (2005) lists the key principles that should be applied to decisions made on planning decisions. These include the principles of sustainable development and high quality inclusive design (paragraph 13). PPS 1 states that planning authorities should seek to “promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused developed land and buildings back into beneficial use to achieve the targets Government has set for development on previously developed land” (paragraph 27).
- 5.2 PPG 3 (Housing) (2000) states that the Government is committed to maximising the re-use of previously developed land for new residential development. Paragraph 58 concerning the efficient use of land requires residential development to be between 30 and 50 dwellings per hectare net. In order to avoid referral of applications to the Secretary of State under the 2002 Density Direction, planning applications should accord with the PPG 3 minimum density guidelines.
- 5.3 PPG 3 paragraph 70 refers to villages and states that significant additional housing is suitable where it can be demonstrated to support:
- local services such as schools and shops, which could become unviable without some modest growth
 - additional homes to meet local needs, and
 - the development can be designed sympathetically and in character with the existing village
- 5.4 WSP within the supporting Transport Statement addresses PPG 13 Transport (2001) considerations to demonstrate that the application is sustainable and contributes to local bus services, cycling and walking initiatives. Key features include:
- Pedestrian and cyclist improvements
 - Financial support to the 28 bus service
 - Support for the OCC Octabus demand responsive bus
 - A residents cycle club
- 5.5 Oxfordshire County Council Best Practice Guides No 4 Rural Bus Services highlights the Government’s objective of increasing rural areas access within a ten minute walk to regular bus services from 36% of households to 48% by 2010. The document highlights that Oxfordshire is close to the national average as a whole but that this masks variation within the County with rural areas in the Vale of White Horse having above average bus availability.
- 5.6 This places Letcombe Regis within the top third of rural areas in terms of public transport accessibility. Letcombe Regis is therefore above average in terms of public transport services. TLMEL will make an appropriate contribution to bus services to reduce the level of subsidy. The development proposals will also increase patronage of the services. In addition TLMEL intend to enter into negotiations with the local bus operator to discuss provision of financial support for bus services in the village including the Octabus Dial a Ride service.
- 5.7 PPG 15 (Planning and the Historic Environment) (1994) reiterates the requirement of the Planning (Listed Building and Conservation Areas) Act 1990 for development affecting a conservation area to preserve or enhance the character or appearance of the conservation area (para 4.14).

- 5.8 This statement demonstrates how these principles of national planning policy are met by the TLMEL outline application and its detailed illustrative plans.

ii) Oxfordshire County Council Structure Plan 2011 (adopted 1998 and amended 2001)

- 5.9 The Oxfordshire Structure Plan reiterates the key themes of national planning policy in seeking the make the most efficient use of previously developed land, which means reflecting PPG 3 guidance on minimum density. The Structure Plan in setting the housing requirements for the Vale of White Horse Council expects sustainable development principles to apply. The recent Local Plan Inquiry Inspectors Report will make recommendations about how the Structure Plan housing requirements up to 2011 will be met. It is TLMEL's case (highlighted by the Oxfordshire's Housing Monitor 2003 Summary) that for the Council to meet its Structure Plan requirements up to 2011 a house building rate of 463 dwellings per year would need to be achieved. The rate is nearly double the rate of actual annual house completions.

- 5.10 Given the pressing need for housing supply to meet demand that is challenging regional spatial strategies, rigidly applying site allocations and housing numbers may not achieve existing levels of housing needs let alone future levels of housing needs. It is unlikely that the Council's housing numbers will be met. It is therefore appropriate for the Council to plan to avoid the difficulties that will arise if it turns out that they have over estimated housing land supply. Given the status of the Dow Agro Site as previously developed and allocated land it is appropriate that its development complies with minimum PPG 3 density guidelines to ensure that the Dow Agro Site makes an appropriate contribution to housing numbers in line with national and local planning policy guidance.

iii) Vale of White Horse Local Plan (adopted November 1999) and Vale of White Horse Local Plan 2011 Second Deposit Draft (June 2004)

- 5.11 The adopted local plan for Letcombe Regis is the Vale of White Horse Local Plan (adopted 24th November 1999). The emerging local plan is the Second Deposit Draft of the Vale of White Horse Local Plan 2011 (June 2004). The Public Inquiry to consider representations to the draft emerging Local Plan closed on 29th July 2005 and it is expected that the Inspector will publish recommendations in December 2005. Due to the advanced stage of the emerging draft Local Plan reference is made to these policies rather than repeating many of the adopted planning policies.

Site Designations

- 5.12 The proposals maps of both the adopted and emerging draft Local Plans show that the Dow Agro Site falls within the Letcombe Regis Conservation Area and the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The Dow Agro site was in active employment use at the time of drafting of the adopted local plan and was not allocated for any particular land use.
- 5.13 Residential development on the site is therefore covered by Policy H5 of the adopted local plan, which states that new development will only be permitted where it is in the main built up area of Letcombe Regis. As described in section 1.0 (above) the site is a built up area at the centre of the village. The proposed development layout significantly reduces the level of footprint compared to the existing development and therefore constitutes the redevelopment of previously developed land. Accordingly, residential development in principle is considered to accord with Policy H5.
- 5.14 Draft Policy H8 vii) of the emerging local plan allocates the planning application site for residential development and hence establishes the principle of residential development on the site.

Density

- 5.15 Draft Policy H14 of the emerging local plan states that residential development must provide for net residential densities of at least 30 dwellings per hectare (criterion (iii) is relevant to Letcombe Regis),

provided that high quality living environments can be created and there would be no harm to the character of the surrounding area or the amenities of adjoining properties.

- 5.16 The development proposal reuses an extensive area of existing office and research buildings. The replacement of these buildings, which make no positive contribution to the conservation area, the AONB and the character of the nature conservation area, will enhance the character and appearance of the area including improving the amenity of adjoining properties. The illustrative plans demonstrate that a high quality living environment can be provided, with generously sized dwellings designed around a series of individual character and courtyard spaces. The dwellings are characterised by spacious plots and generous gardens and amenity space areas.
- 5.17 The density of parts of the existing village is in the range of 45 to 50 dwellings per hectare (particularly around Chance House, South Street and The Old Bakery/ Bakery Lane, which is adjacent to the planning application site). The existing density of these established buildings demonstrates that the density shown on the illustrative plans is not inappropriate and is not out of character with the established pattern of the village.
- 5.18 The existing permitted buildings amount to 12,379 sq m of floorspace equivalent to 9,181 sq m of footprint. There is an existing building footprint coverage of 7,285 sq m. The proposed residential development would reduce the footprint coverage by approximately 33%. The proposal would therefore reduce the actual built coverage of the site from the existing.
- 5.19 Accordingly, it is considered that the illustrative plans demonstrate that the proposed development can be completed in accordance with policy H14 of the emerging local plan.

Mix

- 5.20 Policy H15 of the emerging local plan requires that 50% of proposed dwellings have two bedrooms or less. This policy has, however, been the subject of an objection at the Local Plan Inquiry and accordingly cannot be afforded the full weight of adopted local plan policy. There is no equivalent policy in the adopted local plan.
- 5.21 The proposed development provides a wide range of house types. The attached accommodation schedule (Appendix 2) details the mix of 14 x two bedroom flats, 28 x two bedroom cottages, 36 x 3 bedroom houses, 14 x 4 bedroom houses and 7 x five bedroom houses. This equates to 42% of the total number of dwellings proposed being two bedroom dwellings. In the absence of an adopted local plan policy regarding the mix of dwellings on site, this wide range of house types, including a large number of smaller units, is considered to be an appropriate mixture of dwellings for the site.

Affordable Housing

- 5.22 The adopted (25% target) and emerging (50%) local plans both seek the provision of an element of affordable housing on residential development. The emerging local plan states that the affordable housing provided should be of a size and type to meet local housing needs. The Letcombe Regis Parish Council asked the Oxfordshire Rural Community Council (ORCC) to undertake a Housing Needs Survey to ascertain the amount of affordable housing required by local people with a current housing need that could benefit from a new home.
- 5.23 ORCC's report dated 3rd August 2005, sets out the following local housing needs:
- 3 x 1 bed houses/flats for rent
 - 1 x 1 bed house for shared ownership
 - 3 x 2 bed houses/flats for rent
 - 1 x 2 bed house/flat for shared ownership
 - 1 x 3 bed house for rent

- 5.24 TLMEL accepts the findings of ORCC's local housing needs survey and will endeavour to accommodate these needs within the proposed residential application.

Listed Building

- 5.25 Both the adopted (Policy HE15) and the emerging (Policy HE5) local plans seek to protect the setting of listed buildings. The only listed building near to the appeal site is the Letcombe Regis Parish Church, a Grade II* Listed Building.
- 5.26 An Inspector considered the setting of the Parish Church at an appeal (PINS ref APP/V3120/A/031114122) against the refusal of planning permission for the residential development of the former Church of England school. The appeal site is immediately adjacent to the Parish Church. At the appeal, the Inspector concluded that the setting of the Parish Church is defined by the walls of the church gardens. The setting of the Church was not affected by the proposed residential development and the appeal was allowed.
- 5.27 The Dow Agro Site is a much greater distance from the Parish Church than the above appeal site. It is separated by trees and the road. Accordingly, the proposal for residential development on the Dow Agro Site is considered to have no effect upon the setting of the Parish Church. The closest part of the Dow Agrosciences site to the Parish Church is the Lodge building, which will be retained.
- 5.28 As the setting of the Parish Church will not be affected, the proposed development is considered to comply with Policy HE15 of the adopted local plan and Policy HE5 of the emerging local plan.

Conservation Area and Design

- 5.29 Policy HE1 of both the adopted and emerging local plans reflect legislation that development in conservation areas should preserve or enhance the character and appearance of the area. Policy HE5 of the adopted local plan and Policy HE2 of the emerging local plan seek to ensure that unlisted buildings that make positive contributions to conservation areas should be retained, unless various criteria can be met.
- 5.30 Many of the existing buildings on the planning application site make no positive contribution to the conservation area. On consideration of the Dow AgroSciences 2003 planning application, the Council was minded to grant Conservation Area Consent for the demolition of all the buildings on the site except the former stables block and lodge, which were proposed to be retained by the applicant.
- 5.31 The submitted TLMEL Conservation Area Consent application seeks to include the demolition of the former stables block. The Architectural Appraisal by Aukett Fitzroy Robinson (see separate report) considers the architectural merit of the stables block. This concludes that the block 'is not worthy of retention' and its age, architectural qualities and building fabric qualities are 'not of significance.' Therefore, it is not considered that the stables block (or indeed any of the buildings to be demolished) makes a positive contribution to the Letcombe Regis Conservation Area and accordingly the proposed demolition would accord with Policy HE5 of the adopted local plan and HE2 of the emerging local plan.
- 5.32 The Design Statement prepared by BHP Harwood (see separate report) highlights that Letcombe Regis Village has a diversity of planning forms and architectural styles which, as in many villages, is the result of piecemeal development. There is no definitive vernacular within the village, which illustrates everything from medieval to 1960s and 1970s design. The central area of the village, focused around the Church, is a typical village development following the road network, with properties tight to narrow footpaths and vehicular access at the rear. Here there are half-timbered, thatched cottages and brick and flint buildings with plain clay tiled roofs.
- 5.33 The design concept for the site (as shown on the illustrative plans) is to provide a development that echoes as closely as possible the grain of the existing village, where buildings follow the ribbon line of the roads, with short stub roads leading to groups of houses arranged around courtyards. A

replacement Manor House, located nearer to and orientated the same way as the original 1820s Manor House, provides a focal point and sense of place when entering the site and produces an appropriate setting in front of the existing lake.

- 5.34 The layout places much emphasis on public accessibility and permeability through the site and accommodates many of the desired routes across the site, which link to other amenity areas within the Village (i.e. The Downs, Millennium Green and The Nature Trail). The area around the existing lake will become public open space and will not only benefit the new properties but also provide amenity for the village and accessibility to the new development.
- 5.35 Parking is generally provided within discreet courtyards or carports and garaging is provided to larger detached houses. The parking to the new Manor is within a walled courtyard with carports and some open parking. The Lodge will have its own dedicated car parking, which will also provide overflow parking for the church.
- 5.36 The replacement of the mixture of extended and altered office and research buildings with a well designed residential development is considered to significantly enhance the amenities of Letcombe Regis. Accordingly, the proposed development is considered to enhance the character and appearance of the Letcombe Regis Conservation Area and hence accord with Policy HE1 of the adopted and emerging local plans.
- 5.37 TLMEL considers that the design considerations specified in the Letcombe Regis Design Guide have been fully addressed. TLMEL specifically appointed BHP Harwood architects, in full recognition of their extensive knowledge of the site, the village, the community, the village Working Party and Parish Council and the approval of design principles established by the 44 unit scheme.

Open Space

- 5.38 Both the adopted (Policy H17) and the emerging (Policy H23) local plans state that open space should be provided as part of residential development. The emerging local plan requires 15% of the 'residential area' to be laid out as public open space.
- 5.39 This proposal provides access to 11.51 ha of land as public open space. This is well in excess of the requirement of the emerging local plan.

Trees and Landscaping

- 5.40 Adams Habermehl landscape architects (see separate report) have undertaken and landscape proposal informed by a tree survey to address the retention of mature trees on site and the wider AONB designation. Policy C2 of the adopted local plan and Policy NE6 of the emerging local plan states that development within the AONB will only be permitted if the natural beauty of the landscape will be conserved or enhanced. Policy HE9 of the adopted local plan and the justification to Policy HE1 of the emerging local plan refer to the positive contribution trees can make to conservation areas.
- 5.41 The illustrative layout has been carefully planned to ensure that significant trees will be retained. Mature trees to the site boundary are proposed to be retained, with new planting added to reinforce the boundary framework and filter views of development. It is also proposed to retain mature boundary and lakeside trees and a strong group of trees close to the site entrance which are highly visible from outside the site.
- 5.42 A number of generally low category trees are removed to facilitate development, either to directly allow the placement of buildings, to create effective layouts or to prevent future overshadowing and any future pressure for removal. These are generally of limited value, are generally within the site and cannot be appreciated by the public.

5.43 The proposed landscape scheme will more than replace the trees to be removed with new tree, shrub and hedgerow planting, with marginal aquatic planting to lake and different categories of grassland to open areas. This planting will complement retained vegetation by providing screening to sensitive views and will provide an enhanced landscape framework to integrate and accommodate the proposals. The planting measures will provide amenity to new residents, and to members of the wider public who will use the footpaths and public open spaces within the site. Accordingly the proposal is considered to comply with policy HE9 of the adopted local plan and policy HE1 of the emerging local plan.

5.44 The retained trees, particularly on boundaries, will ensure that the new buildings are no more visible in the wider landscape than those existing on the site. As discussed in section 4.28, above, it is considered that the replacement of a variety of agricultural and research buildings with a high quality residential development will enhance the amenities of the area. The replacement buildings will have a smaller footprint and be more domestic in scale than those existing. Accordingly the proposal is considered to enhance the natural beauty of the AONB landscape and hence accord with Policy C2 of the adopted local plan and Policy NE6 of the emerging local plan.

6.0 A Sustainable and Appropriate Addition to Letcombe Regis

6.1 PPS 1 makes clear the need for development to be 'sustainable', which is a central aspect of Government policy. It is considered that Letcombe Regis has sufficient characteristics to be considered a sustainable location appropriate for the scale of development proposed. A sustainability check list has been prepared and is attached at Appendix 3 to assess the TLMEL application.

6.2 Letcombe Regis was previously home to a number of local facilities including a post office, shop, two pubs and a primary school, and at one stage there was also a petrol pump attached to the post office. In recent years, however, some of these facilities have closed, which is considered to be related to both the closure of the Dow AgroSciences site and the reducing population. However, certain local facilities do remain in Letcombe Regis including:

- a recreation ground, which is home to Letcombe Football and Cricket Club
- a Village Hall
- the Greyhound public house on Main Street
- Village Church

6.3 There are a range of additional facilities available within a short distance from Letcombe Regis, including post offices, schools, several pubs and a couple of supermarkets. Most shopping facilities in the area are located in Wantage where there are large chains (including Waitrose and Boots), banks and a small selection of independent retailers.

6.4 There are a number of local convenience shops, often linked to a post office, in some nearby villages such as Childrey and East Hendred.

6.5 A local bus service (route 38) runs every 30 minutes connecting Letcombe Regis with Wantage, Childrey, West and East Challow. The regular weekday service, the 38 provides a circular service from 7.30am until 6.30pm from Wantage, through Challow, Childrey, Letcombe Bassett, Letcombe Regis and back to Wantage. The direction of the circular route alternates each hour, such that the journey time into Wantage from Letcombe Regis varies between nine and twenty minutes. There is capacity on all these routes to accommodate the proposed residential development.

6.6 With reference to paragraph 70 of PPG 3, concerning significant additional village development and supporting the viability and sustainability of existing villages, development in accordance with the illustrative plans:

- Will provide a critical mass of housing to support a shop and locum. The closure of Dow AgroSciences has demonstrated that the village needs an additional population to sustain local facilities. It is not sustainable to ignore the impact of Dow's closure on the remaining social and community infrastructure of Letcombe Regis.
- Will not change the character of the village from a small village – it will still be a small village on the addition of 99 homes
- Will provide additional family, starter homes and affordable housing with a mix of house types to support additional age groups in the village including growing families, starter homes for new families and affordable homes to meet local housing needs.
- Will support adjoining village and town schools, shops and transportation services

- 6.7 The Village Retail Services Association guidance on establishing village shops, states that a potential customer catchment of not less than 400 people is necessary. With Letcombe's current population standing at 548, and an adult population of 436 (over 18s), the village stands almost on the margin of a viable population for sustaining a shop. The population bolstered by additional housing, therefore, could be critical in tipping the balance in ensuring the viability of the proposed conversion of the Lodge to a shop.
- 6.8 The village has around 60 children of primary school age, this equates to only 8 or 9 children per year group, meaning that class sizes would be very small. A new school in Letcombe Regis is therefore unlikely to be viable or supported by the Local Education Authority – especially given the spare capacity at nearby schools such as St Nicholas' in East Challow, and Sockham and Wantage schools (both on the Letcombe side of Wantage). These three schools have more than 100 spare primary school places between them and there is sufficient capacity in secondary schools to ensure that the proposals create no impact on education places within the catchment.
- 6.9 Although Letcombe Regis has had a number of new houses built over the years, there has not been a substantial village extension of the type seen in East Hendred. This development (centred around Coulings Close) has led to an increase in the population, bringing new residents from outside the village (which now has a population of 1089).
- 6.10 This has meant that East Hendred has been able to retain more social facilities including a post office, two schools and three pubs. It has also contributed to a more stable age structure. Although there is still a limited number of young adults, this is not as acute as in Letcombe Regis.
- 6.11 The proposal for the development of 99 homes, assuming the average District household size of 2.4 would bring an additional 238 people to the village. The area has been losing an average of around 23 people a year for 20 years and therefore the local population would be restored back to that of ten years ago.
- 6.12 Letcombe Regis is an established village that has lost a number of facilities through the non-use of the planning application site. The proposal itself will provide a village shop which will improve the 'sustainability' of the village and be of enormous benefit to existing and new residents. It has been demonstrated that there are a choice of proposals in close proximity of the planning application site that can be reached either on foot or by frequent bus service. Accordingly, it is considered that Letcombe Regis is appropriate for the scale of residential development suggested by the detailed illustrative plans.

7.0 Public Consultation and S106 Contributions

- 7.1 The Dow AgroSciences former application arose from a period of extended consultation with the Letcombe Regis Parish Council and Working Party. TLMEL has undertaken further continued negotiation with these parties and the community of Letcombe Regis. Two public exhibitions have taken place. The outcome of the public exhibition and questionnaire established the following facts:

- 55% of residents supported a residential development

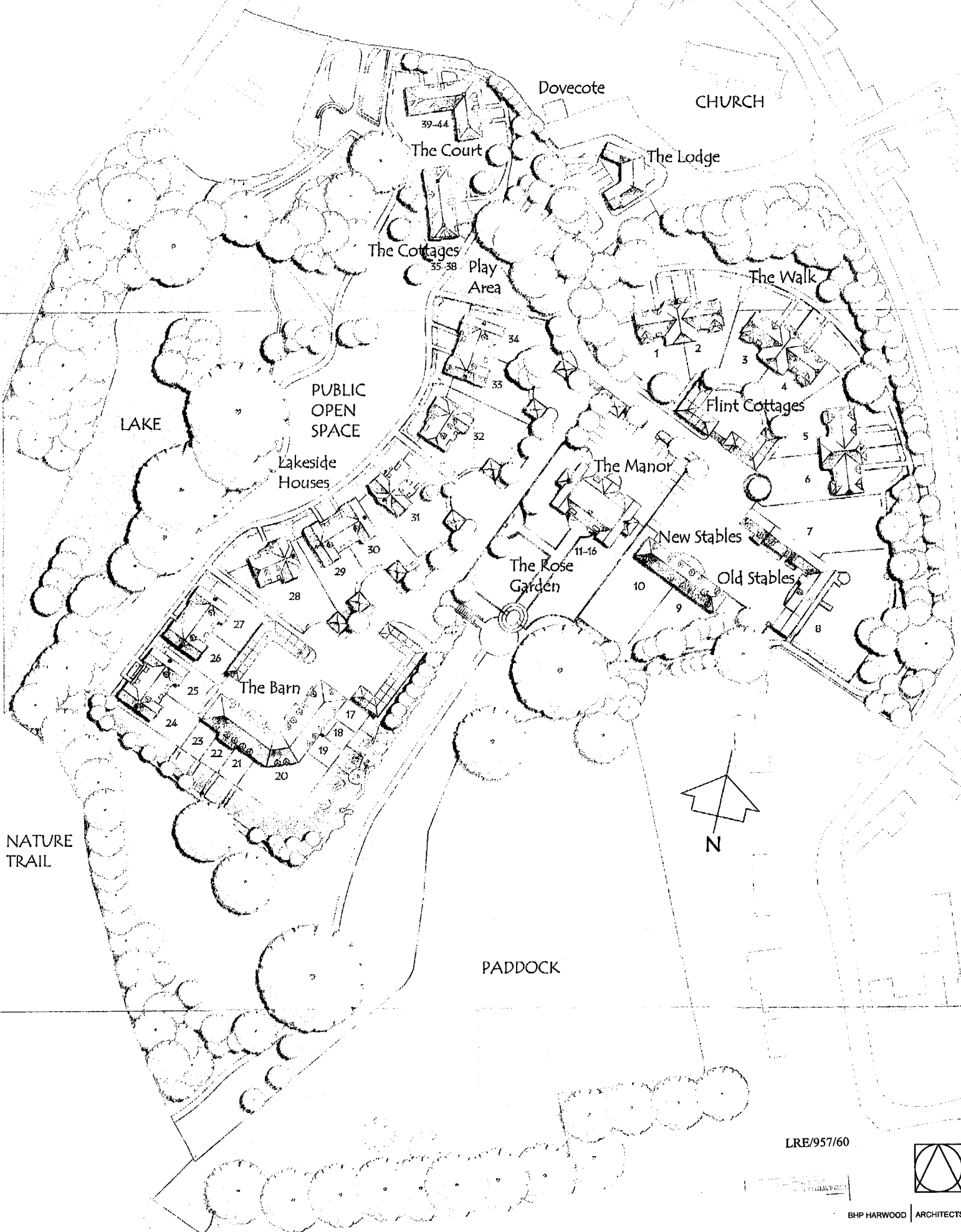
- 34% of residents did not support a residential development
- 79% of residents agreed that the site should be made an integral part of the village
- The three items most frequently mentioned as either 'essential' included the retention of the nature trail, additional church parking and completion of the village green.
- The three items most frequently mentioned as 'very important' included the protection of natural habitat and wildlife, the visual impact of the scheme and the requirement for well designed and good quality buildings. This and the other supporting reports demonstrate how these criteria have been met.

7.2 It is TL MEL's intention to consider the following contributions:

- Church parking to address lack of available spaces and land to site them
- AONB footpath connectivity additional improvements
- Approximately 11.51 hectares of open land opened up to the public and village use
- Community hall contribution
- Affordable housing in accordance with ORCC recommendation (August 2005)
- Subsidised rent for shop
- Open space contribution and enhance village amenity and access
- Management regime for open space areas for future legacy of open space contribution to the village of Letcombe Regis
- Pedestrian and cyclist improvements
- Financial support to the 28 bus service
- Support for the OCC Octabus demand-responsive bus
- A Residents' Cycle Club
- Contribution to additional burial land

8.0 Summary

- 8.1 This statement has demonstrated that the proposed development accords with national planning guidance and adopted and emerging local plan policy.
- 8.2 The detailed illustrative design responds to the historic and sensitive character of the site and surrounding area, by the use of sympathetic forms and materials and offers a variety of dwellings to satisfy local demand. The design also provides public accessibility through the site, preserves the important rural nature of the village, and enhances the visual character of the surroundings. The density of the proposal mirrors parts of the village and will not impact upon the character or setting of Letcombe Regis. The location of the site also enables the centre of the village to be pivotal around the Church.
- 8.3 TL MEL and its design team has worked carefully and thoroughly to consider all matters of importance to Letcombe Regis. This has included consideration of the Parish design code for the site. Integration of the site with the village, whilst limiting visual impact and respecting the character of the village through high quality design has been paramount to the evolution of the design. The design approach has demonstrated that there are no material reasons why the Dow Site should not make an active contribution to national planning policies by making efficient use of previously developed land.



LRE/957/60



BHP HARWOOD ARCHITECTS

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CLIENT:
 DOW AGROSCIENCES

PROJECT:
 PROPOSED RESIDENTIAL DEVELOPMENT
 LETCOMBE REGIS
 OXFORDSHIRE

DATE:
 01/08/0

DRAWING No.
W1018 - 216
 PLAN
 (USED (COLOUR))
 Revision

APPENDIX 3

Letcombe Regis Parish Council

Chairman of the Parish Council

The Old House
Letcombe Regis
Oxfordshire
OX12 9JP

Telephone: 01235 764437

8 November 2005

Mrs Geraldine LeCointe
Area Planning Officer (South)
Vale of White Horse District Council
Abbey House, Abingdon
Oxon OX14 3JE

APPENDIX 4

Dear Mrs LeCointe,

PROPOSED RESIDENTIAL DEVELOPMENT AT LETCOMBE LABORATORY SITE, LETCOMBE REGIS - PLANNING APPLICATION REF: LRE/957/62-X

As you are aware the Parish Council, the Village Development Working Party and the local community have been considering the redevelopment of the Letcombe Laboratory site since its closure in 2002. The Parish Council recognized that the existing use of the site was for employment purposes and had no objection to such a use continuing. However the Parish Council had also accepted that the new owners of the site might wish to redefine its use for residential purposes bearing in mind the increasing value of residential land within the District.

The Parish Council thus chose to act in a positive manner and, after consulting the local residents via a questionnaire and various public meetings, produced a design guide clarifying its expectations for any new residential development on the scheme. In essence the significant points in respect of any new development proposal were as follows:

- In accordance with PPG 3 (paras. 69 & 70) the development should propose only a limited amount of housing. The village has a 'smaller' village classification, limited facilities and is not considered a sustainable location for significant new development.
 - No built development should occur outside of the land denoted as 'previously developed land'. Existing undeveloped land such as the parkland, nature trail, and paddocks should remain as such.
 - In accordance with PPG 3 the new housing development should not be viewed in isolation, and consideration of design and layout must be informed by the wider context (i.e. the local pattern of streets and spaces, building traditions, materials and ecology). The development should avoid uniform estate roads, layouts and house types, which are not characteristics of the village as a whole.
 - Linkages between the site and the village are necessary to assist in the functional and physical integration of the development with the existing village.
- ...more...

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- Natural features existing on the site, such as mature trees and those with amenity value, open spaces, nature trail, parkland and lake should be retained and the scheme designed in such a manner to ensure this.
- Affordable housing should be incorporated into any scheme without physical distinction from the private market dwellings.
- The walled embankment and its related trees along South Street and the brick wall along Bassett road are, as identified by English Heritage, important features that contribute positively to the historic street scene and conservation area, and hence should be retained.
- Any new development should not adversely impact upon the limited facilities available within the village, and where this is likely to occur the Parish Council will expect suitable resource and financial contributions to mitigate against this impact.

These views were presented to The Letcombe Manor Estate Ltd (TMEL) during a number of pre-application meetings; unfortunately TMEL felt unable to incorporate these into their proposal submitting instead a scheme of 99 dwellings as presented in the current application.

The Parish Council has grave concerns regarding the scale of the proposal and its consequential impact on the site and the surrounding area, and hence must formally **OBJECT** to this application.

In detail our concerns are as follows:-

Inappropriate scale of development

The scale of the development at 99 dwellings forms major residential development in a small village, contrary to the objectives of PPG3 and PPS7 which seek to focus major development within large urban settlements and severely limit such development within rural areas and Areas of Outstanding Natural Beauty (AONB).

The scale of the development would increase the number of dwellings within the village (currently 212) by almost 50% swamping the few existing community facilities provided by the Parish. It would also harm the character of the village with regard to its appearance and sense of place, that is, the development would result in the construction of a large unrelated housing estate at odds with the existing village layout and contrary to the small-scale ambiance of Letcombe Regis and the conservation area and AONB in which the site is located.

In an attempt to comply with paragraphs 69 and 70 of PPG3 which seek to limit large housing developments in villages, unless they can demonstrate amongst other things that they are necessary to support local facilities, the applicants have stated in their supporting statement (section 6.0) that the history of the village displays a declining settlement with a dwindling population and the closure of many facilities since the closure of the Dow operation. Such a picture is untrue. The census figures illustrate that the adult population has increased significantly from 519 in 1991 to 548 in 2001. Facilities such as the shop and post office closed some 20 years ago, the school 10 years ago, and the Sparrow Pub some 7 years ago, all before the closure of the Dow operation. ...more...

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There is no evidence presented by the applicant to suggest that this development is necessary to retain the remaining facilities within the village, nor that an increase in the population of the village will support additional facilities. Indeed research undertaken by West Oxfordshire and the Vale of White Horse District Councils, presented by the Countryside Agency in their document entitled *Are Villages Sustainable*, concludes that the provision of large housing developments within villages does not maintain or enhance local facilities nor reduce travel by the private car.

“..it is apparent from the findings that many villages are not viable and those that still are, are on the whole becoming less so, despite the addition of new development to them.” (Countryside Agency, 2002)

Unsustainable Location and Traffic Generation

In addition research in both West Oxfordshire and the Vale of White Horse, also cited in the Countryside Agency's report, notes that new residents within villages are highly reliant on their cars with almost 100% of residents within small villages working and shopping outside of their home settlements. Simply providing additional funding towards the existing bus service is unlikely to persuade these residents to use the bus instead of their cars nor make the settlement any less unsustainable.

The bus service for the village is poor with a frequency of one bus per hour on a circular route which serves the village between 7.40am and 5.48pm. Not surprisingly few people appear to use this service, which is subsidised by the County Council, and instead use their cars.

A standard rule of thumb used by County Highway Officers is that a single dwelling will generate approximately 7 trips per day. This reliance on the car is particularly likely in a rural area such as Letcombe Regis. The development of 99 dwellings will thus produce approximately 693 journeys, a significant number for a small village with narrow winding roads. These numbers will have a significant impact on the character of the village, causing noise and disturbance to the otherwise quiet village atmosphere. The narrow single-lane entrance, which emerges on a blind right-angle bend and narrow four-way junction, will only compound the traffic problems.

This traffic will also pose a highway risk to pedestrians walking through the village along roads which are not always served by footpaths, and to cyclists, some of whom are elderly residents of the village. It must also be remembered that Letcombe Regis and Letcombe Bassett are home to a number of stable yards and both villages have long-time connections with the racing industry. The roads are used, on a daily basis, as part of the exercise routine for locally based horses.

We would dispute the highway projections of the Dow site contained within the submitted transport assessment as many of the staff lived locally and were able to walk or cycle to this place of employment. In addition the company encouraged car sharing. Even at its busiest the site did not generate more than 300 journeys per day (i.e. staff arriving in the morning and leaving in the evening). Since the wind-down and closure of the site in 2000 the village have experienced even smaller numbers of traffic generation.

...more...

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We would also criticise the comparative use of the site for a commercial business, as a fallback position; this is clearly circumstantial. For a business to efficiently utilise the whole site, rebuilding would be necessary, all requiring planning permission. The District Council would be in a position to refuse planning permission should such proposals result in large-scale traffic generation as that suggested in the applicant's transport report.

Density

We have no objection to the principle of a density of 30 dwellings per hectare but clearly the applicants are using this figure to justify a massive scale of development, rather than applying alternative methods of building at this density without producing a major development scheme (e.g. by reducing the area of built development).

By linking the two, that is the density with scale, the applicants have produced a scheme that is insensitive to the existing features on the site (eg. mature trees and ecological habitats), the conservation area, the AONB, and the setting of the Grade II* listed church.

Harm to the Conservation Area

The Letcombe Conservation Area is characterised by a number of historic buildings fronting onto narrow roads. Noticeably these buildings have a varied appearance and style. The development would create a large uniform housing estate by virtue of the buildings identical age, the likely use of materials from one or two suppliers, and the design style of a single architect and building contractor. Such uniformity would create a significant discord with the character and appearance of the existing buildings within the Conservation Area.

In addition the village is a small historic settlement with a quiet rural village ambiance. The large increase in households and their associated traffic journeys will destroy this tranquillity and detract from the historic character of the village.

We are also concerned that the application proposal involves the demolition of the Manor House and stables and would prefer both buildings to remain within any proposed scheme. Although we recognize that neither building is considered worthy of listing in their own right we would draw your attention to the comments of both English Heritage and Giles Quarme on the previous proposal which state that the Manor House, the stables and the brick garden walls/gates make a positive contribution to the conservation area and contribute to the historic evolution of the site.

Harm to the Area of Outstanding Natural Beauty and Wider Landscape

The character of the Downs in this location is of open rolling hills with small villages nestling into the landscape and screened by mature trees and copses. The site is currently screened from the Downs and the nearby public footpath by a 'berm' (ie. a landscape embankment) constructed by Dow circa 1990 to hide the office and research buildings. The existing buildings have also been carefully located on the site so that the majority of single storey buildings are positioned adjacent to the southern boundary, and the taller two storey buildings within the centre of the site. This ensures that the buildings are screened from public vantage points on the Downs by existing vegetation and the 'berm'.

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The application proposes the removal of the berm and the opening up of the southern boundary to permit views of the Downs for the occupants of the new houses. In addition the height of the buildings on the site will be increased, ranging from 8 metres to 12.4 metres. This will highlight the visual presence of the development when viewed from the Downs and represent a new housing estate 'jutting out' into the rural landscape to the overall detriment of the character and appearance of the AONB.

Harm to the trees within the site

The scheme will result in the loss of a number of trees within the site either directly as shown on the proposed plans, or indirectly through future pressure on behalf of new occupants. Many of the large mature trees result as a feature of the original parkland landscape of the site, and some of these will be located within gardens and/or adjacent to proposed buildings. It is unrealistic to expect the new residents, some of whom will have very small gardens, to accept these trees and the loss of light caused by their close proximity. It will thus be difficult for the District Council to resist subsequent applications for their removal.

The proposed removal of trees along the South Street embankment and their replacement with smaller trees also raises concern regarding the structural integrity of the boundary wall should the trees be uprooted, and the potentially significant alteration to this part of the conservation area which is characterised by the narrow sunken road framed by tall trees on the southern side.

Lack of Housing Need

The Vale of White Horse Local Plan has identified sufficient land to meet the Structure Plan requirements to 2011. There is no shortfall within the Council's figures, including windfall sites, requiring a site of 99 dwellings to be permitted. Indeed the provision of this site, if permitted, could lead to an over provision relative to the Structure Plan contrary to the policies of restraint.

Unfavourable Precedent Set

We also have strong concerns that the acceptance of a development of this scale would undermine policy H11 of the Local Plan which only permits small scale developments within small villages, and set an unfavourable precedent for other sites within the village to be redeveloped for large residential schemes, or worse for a larger scale development on this site. It would be difficult for the Council to refuse an application for a scheme of 150 or 200 dwellings, based on the acceptance of a scheme for 99 dwellings. This would lead to an exacerbation of the adverse consequences already mentioned previously.

Potential Harm to Ecological Interests

We are concerned regarding the lack of consideration by the applicants to the existing ecological interests on or near the site that will be affected by the development. There are known protected species on site, which are protected under the Wildlife and Countryside Act (schedule 5), European Habitat Directives annexes 2 and 5, Bern Convention appendix 3 and the UK Biodiversity Plan. As you will be aware, the District Council has responsibility for protected species under PPS9 and the council could be prosecuted if protected species are damaged or destroyed.

...more...

The lake forms part of the Letcombe Brook and hence any impacts on this feature are likely to impact further downstream. The Environment Agency has recently undertaken a white-clawed crayfish survey of the Brook (September 2004) and important colonies of this protected species have been found in Letcombe Regis.

Water voles are also known to be present on the Letcombe Brook and a Phase I habitat survey carried out by the applicants has confirmed that bats are resident – both are protected species. In addition, sightings of waterfowl, barn owls, kingfishers, Canadian Geese, roe deer and badgers (also protected) have been made on the site, and it is known that brown trout and Miller's Thumb have been found in the lake.

The applicants have only undertaken a basic habitat survey with no consideration as to how the development would impact on these species, especially those which are protected under national and European legislation. The construction of the development on the scale proposed could result in changes to the surface water run-off, increased human disturbance, increased light pollution, and predation by domestic pets as well as destruction of habitat. We would urge that further surveys and ecological reports should be undertaken and English Nature consulted prior to the determination of the application, with clarification on the potential impacts of the development, and any proposed mitigation measures.

We are also concerned regarding the management of the open spaces, trees, and lake within the site, and the nature trail and fields adjacent to the application site but within the ownership of the applicant. These features have value not only with regards to ecological interest but also in terms of amenity. In particular the nature trail, which is linked to the public footpath route between Letcombe Bassett and Letcombe Regis villages, forms an important recreational role and should be retained to maintain the link between the site and its neighbours. If inappropriately managed these features could be lost to the detriment of the surrounding area.

Village Survey

Although the undertaking of a village survey by the applicants in order to seek local opinions was an admirable objective, the questionnaire was biased towards new development on the site. Many of the responses in favour of new development on the site were caveated with regard to scale and the need for this to be appropriate for the size of the village.

In addition the survey responses demonstrated that residents were sceptical regarding the demand for a locum or village shop and whether such a facility would be viable. We believe that the results of this questionnaire have been interpreted in such a way to illustrate a perception that the village supports the development. The Parish Council strongly believe that this is not the case, and suspect that this will be apparent from the letters sent by local residents during the course of this application.

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To conclude the Parish Council is not against the principle of residential development on this site, but consider that it is vital that an appropriate development be sought which is sensitive to its location and context and the character of this small village. The proposal is contrary to both national and local planning policies and hence we thus respectfully request you refuse this planning application.

Yours sincerely

Maurice Ginniff
Chairman of Letcombe Regis Parish Council

c.c: Councillor Andrew Crawford,
Councillor Anda Fitzgerald-O'Connor,
Mr Ed Vaizey MP
Mr Huw Williams, North Wessex Downs AONB

Letcombe Regis Parish Council

Chairman of the Parish Council

The Old House
Letcombe Regis
Oxfordshire
OX12 9JP

Telephone: 01235 764437

14 November 2005

Mrs Geraldine LeCointe
Area Planning Officer (South)
Vale of White Horse District Council
Abbey House, Abingdon
Oxon OX14 3JE

APPENDIX 4

Dear Mrs LeCointe,

**PROPOSED DEMOLITION OF BUILDINGS AT LETCOMBE LABORATORY
SITE, LETCOMBE REGIS
APPLICATION FOR CONSERVATION CONSENT REF: LRE/957/63-CA**

Letcombe Regis Parish Council **objects** to this proposal for the following reasons and would respectfully request that the application be refused.

The loss of the Manor House, Stables and garden walls would harm the character and appearance of the Letcombe Conservation Area.

The Letcombe Laboratory site has an interesting history and the land can be traced back as far as 1042 when it was 'part of the ancient demesnes of the Crown'. Latterly, however, it was the location for the Letcombe Manor in the early 1800s. This Manor consisted of a large Manor House called Benhams which was facing towards the lake (referred to as the Fish Pond). There was an Icehouse situated between the Manor House and the lake, the Lodge at the entrance to the site, and the stable block to the east of the Manor House. The grounds around the Manor House were laid out in a formal garden enclosed by brick and stone walls, whilst further afield the grounds were kept as a Parkland containing mature trees and the lake.

In the early 1900s the Benhams Manor House was replaced with a new Manor House, as currently exists today. Subsequent extensions and outbuildings were erected in the late 1900s in connection with the Laboratory, and a berm of soil raised along the southern boundary of the site in order to screen it from the wider landscape.

Notwithstanding these later works remnants of the original Manor still exist on the site, including the formal garden walls and the stables. Giles Quarme, an architect specialising in historic buildings, noted in his report dated April 2003, that was submitted with the early application for development on the site (app nos. LRE/957/60), that the walls and brick piers were visually attractive and should be retained where possible and incorporated into any new development proposal.

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With regard to the stables Mr Quarme clarified their value in paragraph 4.2.5 stating:

"The alterations to the exterior of the building has ensured that there is no likelihood of it being listed as its quality has been impaired. However it does make a positive contribution to the conservation area and contributes to the historic evolution of the site. The unsympathetic alterations can easily be reversed and the original attractive appearance of the building easily and fully restored."

In terms of the existing Manor House there was some confusion regarding its age. Jeremy Blake (the architectural specialist for the current application) thought it had been constructed circa 1910. Giles Quarme did think the building of an older date, but noted in his report that if it was constructed in 1910 then the house would be of *considerably greater historic and architectural interest than if it was constructed between the wars.*

He states in paragraphs 4.3.3 and 4.3.4:

"A date of 1910 would be an early example of the Georgian revival which is so characterised by the work of Ernest Newton and his followers.....Many of the buildings by Ernest Newton and his colleagues have now been recognised as being an important part of architectural evolution in the Edwardian period, and have been protected by being given listed building status.

If the building was constructed in 1910, by a well know architect and in good order, then I have no doubt that the building would be considered to be making a major contribution to the conservation area and be a legitimate candidate for statutory listing. "

The Parish Council can confirm, however, that it was built in or before 1905 as it is clearly described in the 'Notes on Letcombe Regis' published by H J Daniel in 1906.

Although Mr Quarme notes that the modern extensions to the house have devalued the aesthetic values of two of the facades, including the main entrance, he considers that the remaining untouched facades make a positive contribution to the conservation area. He also considers that parts of the interior of the house are exceptionally fine, containing a plethora of quality period features including a carved timber and stone fireplace, polished mahogany doors, historic joinery and plasterwork and a grand staircase.

PPG15 states in paragraph 4.27: *"The general presumption should be in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area. The Secretary of State expects that proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish listed buildings."*

...more...

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14 November 2005

The Parish Council believes that there is enough evidence to demonstrate that the original part of the existing Manor House, the stables and the garden walls are attractive features that contribute to the historic character of the surrounding area and the Letcombe Conservation Area, and hence should be preserved.

There is no acceptable redevelopment scheme for the site

PPG15 clearly states in paragraph 4.27: “...Consent for demolition should not be given unless there are acceptable and detailed plans for any redevelopment. It has been held that the decision-maker is entitled to consider the merits of any proposed development in determining whether consent should be given for the demolition of an unlisted building in a conservation area.”

The previous application illustrating a scheme of 44 dwellings was withdrawn in January 2005 and hence the only application relevant to the site is that recently submitted for a scheme of 99 dwellings. This application has not yet been approved by the local planning authority, and bearing in mind the application is a departure from the development plan and in discordance with national planning policy contained within PPG3, we anticipate its refusal.

It would thus be unacceptable for this demolition application to be granted consent without an appropriate redevelopment scheme which could be implemented on the site.

Ecological issues related to demolition

Although such issues are not normally addressed as part of Conservation Area consent they are relevant to this site as several protected species have been identified as being present or likely to be present. In particular, bats are known to be roosting in several of the buildings and trees. If demolition were to take place then the habitats of the protected bats will be destroyed. Therefore, before the planning application can be considered it will be important to undertake more detailed and informed surveys to gain accurate data on the ecological status of the protected species or habitats within the site so that appropriate mitigation can be agreed. Such surveys require detailed technical knowledge from a competent and independent authority so that the developer can provide detailed plans for mitigation and a schedule of works and, where necessary, obtain the appropriate licences from DEFRA.

In light of the above points, the Parish Council would wish to see this application for demolition refused.

Yours sincerely

Maurice Ginniff
Chairman of Letcombe Regis Parish Council
cc: Councillor Andrew Crawford,
Councillor Anda Fitzgerald-O'Connor,
Mr Ed Vaizey MP
Mr Huw Williams, North Wessex Downs AONB

CONSULTATION WITH OXFORDSHIRE COUNTY COUNCIL
AS STRUCTURE PLAN AUTHORITY

Report to the Head of Sustainable Development

REDEVELOPMENT FOR RESIDENTIAL USE (99 UNITS), FORMER DOW AGRO SCIENCES SITE, LETCOMBE REGIS	
Application No: LRE/957/62-X	
District Council: Vale of White Horse	Applicant: The Letcombe Manor Estate Ltd (TLMEL)
<p><u>Development Proposed</u> (site area 4.9 ha)</p> <p>1. Outline application for the demolition of all buildings except for the lodge and redevelopment for residential use, provision of a retail unit and/or locum health facility in the lodge, rearranged access, car parking, landscaping and ancillary development. An illustrative plan shows 99 units. A supporting statement implies an offer of 9 affordable dwellings.</p> <p><u>Location</u> (see plan attached)</p> <p>2. Former Dow Agro Sciences Laboratory Site, South Street, Letcombe Regis.</p> <p><u>Site Features Relevant to Structure Plan</u></p> <p>3. The site is now vacant and includes a former manor house, lodge and stables as well as more modern laboratory buildings, glasshouses and other buildings associated with its former scientific research use. It lies within the Letcombe Regis Conservation Area and the North Wessex Downs AONB. To the east and west of the site are residential properties. A sports ground and village hall are situated to the north west of the site. Part of the eastern edge of the site comprises a high landscape bank created to screen the former laboratory site from the rest of the village. The southern edge of the site extends from a paddock into larger fields.</p>	

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Planning Policies Affecting Proposal

4. (a) Strategic Policy Area: Vale of White Horse.
- (b) Adopted Structure Plan 2011 Policies (copies available in full on request):
G1, G2, G3, T18, EN1, EN4, EN8, H1, H3, H4, R2
- (c) Structure Plan 2016 Policies as resolved to be adopted (copies available in full on request):
G1, G2, G3, T8, EN1, EN4, H1, H3, H4
- (d) Local Plan Zoning and other policies: Vale of White Horse adopted local plan – site is not allocated. New housing on unallocated sites will be limited to infilling and minor development/redevelopment (policy H5). An element of affordable housing will be sought in developments of 25 or more dwellings (policy H3). Policies to conserve and enhance the landscape of the AONB and the character of conservation areas and to protect listed buildings and their settings. Where necessary the District Council will seek obligations for the provision of supporting infrastructure (policy D9).

Revised Draft Vale of White Horse Local Plan 2011: site is allocated for 44 dwellings (policy H8). 50% of new dwellings should be affordable on sites of 4 or more dwellings in small villages (policy H16). Development will only be permitted where necessary social and physical supporting infrastructure exists or will be provided (policy DC8). Similar policies on the AONB, Conservation Areas and listed buildings as adopted plan.

Planning History/Background

5. Dow Agro Sciences Ltd occupied the site for agricultural scientific research until 2002; the site is currently unoccupied and continues to have permission for employment use.
6. In November 2003 the County Council was consulted on a proposal by Dow Agro Sciences Ltd to redevelop the site for 44 dwellings. The Council commented as follows:

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- a) it considers the development proposed in application no. LRE/957/60 to be contrary to the principles of sustainability guiding the location of new development in adopted and draft Structure Plan policies G1 and H1, adopted and draft plan housing policies and government advice in PPG3 and PPG13;
- b) however, in view of the site's existing potential to generate a significant number of journeys, it considers the proposed development would be a more sustainable option than continued employment use, provided that planning permission is subject to a legal agreement to secure appropriate contributions to necessary supporting local transport and service infrastructure;
- c) if the District Council is minded to approve the proposals, the application should be advertised as a departure from the development plan."

The District Council resolved to grant planning permission for the proposed development but the application was called in for determination by the Secretary of State. The applicant withdrew the application before an inquiry was due to take place.

7. A supporting planning statement argues that the proposal is consistent with national and local planning policy in that the site is previously developed land, it is allocated for housing development and it meets minimum PPG3 density guidelines of 30 dwellings per hectare. As such, the applicant argues that the proposal would make an appropriate contribution to the housing provision for the Vale in line with national and local planning policy guidance. The applicant considers that the site is a sustainable location for the scale of development proposed. It points out that the village has a recreation ground, village hall, public house and church and there are other facilities in close by settlements; it also claims that Letcombe Regis is above average in terms of public transport services. It is argued that the proposed development would provide a critical mass to support a shop and sustain local facilities. In the applicant's view, the addition of 99 homes would not change the character of the village. The applicant sets out a list of items to which it will consider making contributions; it includes pedestrian and cycle improvements and financial support for public transport but does not include items of County Council service infrastructure.

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Comments

8. The proposal is for large scale housing development in a small rural village which lacks a reasonable range of employment opportunities, services and community facilities and which is served by only a limited level of public transport services. As such it would be likely to give rise to a need to travel, particularly by private car, contrary to policies G1 and H1 in the 2011 and 2016 Structure Plans and government advice in PPG13.
9. The site is previously developed (employment) land in an unsustainable rural location. New paragraph 42a in PPG3 (January 2005) advises that housing applications on redundant employment sites should be favourably considered unless, amongst other things, they fail to perform well against the following criteria (set out in paragraph 31 of PPG3):
 - a) location and accessibility: The new residents would have to travel to Wantage or other service centres for practically all services. The lack of footpaths and cycleways would discourage travel by these modes. Letcombe Regis has limited bus services (no evening and Sunday services) to Wantage which offers limited employment opportunities; a change of bus would be needed to access jobs elsewhere and this would be likely to discourage public transport use. Access to most jobs, shops, services and facilities would rely heavily on private car use;
 - b) capacity of existing and potential local infrastructure to absorb further development: There is no spare capacity at the local primary school in Childrey and, based on current information, the applicant is not offering to contribute to the additional facilities required to accommodate the primary aged pupils who would be generated by the development. In addition, the site's unsustainable location would result in a cost to the County Council in transporting children to the local primary school and the local secondary school in Wantage; these costs should be required to be met by the development. The local library at Wantage is undersize for its existing catchment area; contributions would be required to the costs of measures to mitigate the impact of the extra demands of the additional population from the new housing. Contributions would also be required to the fire and rescue, waste management and museum storage services.

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- c) the ability to build communities: The proposal would add 99 households to a community of only about 220 households with few existing services and facilities. The applicant offers a site for a shop and/or locum but there is no guarantee that this would be taken up. The community would mainly rely on settlements elsewhere for other services and facilities. The applicant also implies an element of affordable housing (less than 10%) within the new development. The District Council is best placed to determine whether the level of affordable housing offered is commensurate with the housing need identified in their housing needs survey and consequently whether it meets the requirements of policy H4 in the 2016 Structure Plan. Overall I am concerned that the proposal, in increasing the population of the village by almost 50% but with the little affordable housing or supporting infrastructure, would have a detrimental impact on the social and economic wellbeing of the local community and fail to create a sustainable community as envisaged in PPG3;
- d) physical and environmental constraints: The District Council is best placed to assess the benefits and impacts of the proposal on the character of the Conservation Area and the AONB.

In my view the proposal performs poorly against the sustainability criteria in PPG3 and the emphasis placed on developing previously developed land should not apply in this case.

10. The proposal is contrary to the adopted Local Plan in that it is large scale development in a village where development will be limited to infilling and minor development or redevelopment. The District Council allocated the site for 44 dwellings in the revised Local Plan 2011 as it was considered that that level of development would result in reduced vehicle trips compared to the employment use and the removal of semi-industrial buildings would bring environmental improvements. This proposal is contrary to the revised Local Plan in that it would more than double the allocated number of houses which would result in significant traffic movements to and from the site in excess of the levels generated by the previous employment use.
11. The Council as highway and transport authority objects to the proposal as it is in an unsustainable location and contrary to County and District policies relating to the intensification of sub-standard roads and junctions which could lead to potential highway safety concerns.

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12. The proposal raises concerns for the Council as service provider as set out in paragraph 9 above. Detailed requirements for developer contributions will be sent separately to the District Council by the developer funding team. If granted, planning permission should be subject to a legal agreement to secure contributions to all necessary supporting infrastructure in line with Structure Plan policy G3.

Notes

The Council's comments as Highway Authority are being dealt with separately.

Recommendations

12. **It is RECOMMENDED that the County Council as Structure Plan authority informs the Vale of White Horse District Council that:**
- a) **it objects to the development proposed in application no. LRE/957/62-X as it is contrary to the principles of sustainability guiding the location of new housing development in policies G1 and H1 in the 2011 and 2016 Structure Plans, the housing policies in the adopted and revised draft local plan and government advice in PPG3 and PPG13;**
 - b) **nevertheless, if the District Council is minded to permit the proposal:**
 - i) **planning permission should be subject to a legal agreement to secure developer contributions to all necessary supporting infrastructure in accordance with policy G3 in the 2011 and 2016 Structure Plans and**
 - ii) **the application should be advertised as a departure from the development plan.**

Date 27 October 2005 Dealt with by Linda Currie File 8.4/3886/2

AB



OXFORDSHIRE
COUNTY COUNCIL

ENVIRONMENT & ECONOMY

www.oxfordshire.gov.uk

APPENDIX 6

The Planning Department
Vale of White Horse District Council
Abingdon

Speedwell House
Speedwell Street
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OX1 1NE

Tel: 01865 815700
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13 October, 2005

My ref: 05/01349/OUT

Your ref: LRE/957/62-X

Direct line: 01865 816042

Please ask for: Stuart McDougall

e-mail: stuart.mcdougall@oxfordshire.gov.uk

For the attention of Geraldine LeCointe

Dear Geraldine

**The Letcombe Manor Estate LTD
Dow Agro site, Letcombe Regis, Wantage, OX12 9JT
Redevelopment for Residential Use**

The most recent use of the Dow Agro site was as an agricultural scientific research centre. Although not ideally situated, it is not unreasonable for an agricultural research centre to be located in a rural area. One could argue that as agricultural research is related to agriculture and farming and also requires large areas of land to grow plants, a rural location would be appropriate for this type of use. However, the Highway Authority believes that the site is unsuitable for dwellings from a transport sustainability point of view and it is likely to rely very heavily on private car use.

The Highway Authority considers the site unsustainable for the following reasons:

Public Transport

Contrary to the information given in the supporting statements Letcombe Regis does not have an hourly bus service, the No. 38 bus runs twice during the morning and four times in the afternoon. The No. 67 bus runs three times during the day to Wantage. This can not be considered a regular bus service of a standard which is likely to encourage regular use. It should also be noted that these bus services are to Wantage which offers limited opportunities for employment and occupants of the proposed dwellings are likely to have to change buses for employment elsewhere. Changing buses would also discourage public transport use.

Walking and Cycling

Letcombe Regis offers very few local services to which occupants could walk or cycle to, therefore the new residents would have to travel to Wantage for practically all services,

Richard Dudding - Director for Environment & Economy Richard Dix - Interim Head of Transport

from buying a newspaper to seeing a doctor. Without footpaths, street lighting or cycleways and considering it is approximately 3 km to Wantage, it is unlikely that the occupants of the proposed site will walk or cycle to gain access to services.

School Buses

Letcombe Regis does not contain a primary or secondary school, the surrounding roads are narrow country. Therefore children will need to be driven to school by their parents or be reliant upon the school bus. The County Council funds two buses, one to the Ridgeway School in Childrey and one to King Alfred's School Wantage. Although Letcombe Regis does not meet County Council's requirement of a minimum distance of 3 miles to the nearest school in order to qualify for school buses, as the walking / cycling routes are poor, the school bus is considered a necessity. A development of the size proposed could generate 25 primary school children and 20 secondary school children. This increase in numbers could require additional or larger buses to be provided by the County Council at considerable expense. This expense is on-going for the entire life of the housing.

Highway Network

The road from which the site is accessed also acts as an access road to the Church. The access road is in a cutting with an earth bank on one side and a raised footway on the other. The carriageway is below a suitable standard in width to the extent that it would be difficult for vehicles coming from the west of the Lodge to turn into the lane without colliding with a vehicle driving up the lane towards the site. As the carriageway is restricted on both sides, widening does not appear to be an option. Consequently any increase in traffic movements over and above the traffic generated by the existing or previous use of the site would not be in the interests of highway safety.

The junction at South Street with the site access road and Main Street is again highly unorthodox and is likely to lead to driver confusion regarding which vehicle at the junction has priority and the route oncoming vehicles are proposing to take. Further, visibility at this junction is substandard. Again I consider any intensification of the junction over and above its previous existing generation to be not in the interests of highway safety.

Traffic generation

The highway authority's major concern regarding the proposal is the poor sustainability of the location. We believe that the use of the site for 99 dwellings will lead to an increase in traffic movements over and above what the previous use of the site. When considering and comparing trips with regard to relative sustainability, the total number of trips generated should be considered as opposed to peak hour trips. I agree with the TRICS analysis in the Transport Assessment at Para. 5.1.3. regarding traffic generation from the proposed housing development. This suggests that each dwelling will generate an average of 7.95 movements per day; this is an average figure for less sustainable sites that are entered into the TRICS data base.

However considering that the sustainability of Letcombe Regis is extremely poor, there is a good argument for using 85 percentile trip rates as opposed to average. This indicates a house could generate 10.6 trips a day. Therefore 99 dwelling site would generate an average of 787 movements per day but could generate as many as 1049 trips a day.

The applicants have not provided records proving the number of traffic movements that the site generated in the past but has provided a summary. In order to confirm the figures in the summary the Highway Authority would like to have sight of the raw data. The summary suggests that between 1995 and 1999 the site employed between 130 – 160 persons and generated between 590 to 680 trips per day, say on average 635 trips a day. Consequently one can see that the proposed use of the site has the ability to generate considerably more trips than the previous use.

It could be argued that it would be possible to use the site for B1 use without the need for further planning permission. Whilst in theory this is correct, considering the quality of the buildings, the highway authority believe that this is extremely unlikely; and that in order to attract occupiers the buildings would need to be improved which would require planning permission.

Conclusions

For reasons stated above, the County Highway Authority considers that the site is in an unsustainable location and contrary to County and District policies regarding intensification of sub-standard roads and junctions which could lead to potential highway safety concerns.

Yours sincerely,

Stuart McDougall
Principal Transport Planner

The Letcombes Conservation Group

Chairperson: Mrs Christine Birch

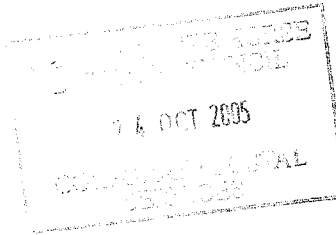
Tel : 01235 763529
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1 Post Office Lane
Letcombe Regis
Oxfordshire
OX12 9JZ

17 October 2005

Ref: **LRE/957/62X**
Letcombe Laboratory

Mrs Geraldine LeCointe
Area Planning Officer (South)
Vale of White Horse District Council
Abbey House
Abingdon
Oxon OX14 3JN



Dear Mrs LeCointe

I am writing on behalf of the Letcombes Conservation Group to oppose the application at Letcombe Laboratory in its present form. The main issues of concern are:

- The visual impact on the AONB and Conservation Area of a development of this magnitude in area, number of residential units, and design i.e. height and lack of vernacular construction in keeping with the existing village buildings.
- The volume of heavy lorries on site and access roads during construction, and the subsequent volume of vehicular movement through the village.
- The lack of management plans for those areas of the site of recognised wildlife value (the Letcombe Brooke habitat corridor including stream, lakes, grassland and Nature Trail.)
- The inability of the development to meet the 3 criteria required to support a DEFRA licence application due to the presence of bat species in the existing buildings (as identified by the ecological survey as part of the submission) namely:
 - 1) no satisfactory alternative is possible;
 - 2) development is not detrimental to the maintenance of the population of species concerned at a favourable conservation status in their natural habitat;
 - 3) the development must be for "imperative reasons of overriding public interest including those of social or economic nature".

Yours sincerely

Christine Birch

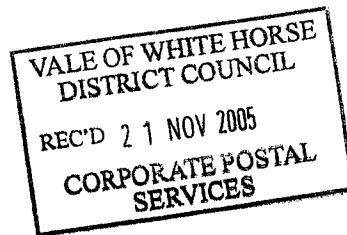
c.c.

Mr Andrew Crawford, District Councillor
Parish Councils: Letcombe Regis and Letcombe Bassett
Mr. D.A.J. Endacott, Oxfordshire Bat Group.

APPENDIX 8

Letcombe Brook Project
C/o Vale and Downland Museum
Church Street
Wantage
OXON
OX12 8BL
01635 860157

Mrs Geraldine LeCointe
Team Leader
Vale of White Horse District Council
Planning Department
Abbey House
Abbey Close
Abingdon
Oxon
OX14 3JE



14 November 2005

Dear Mrs LeCointe

RE: PLANNING APPLICATION – DEMOLITION OF ALL BUILDINGS EXCEPT THE LODGE, LETCOMBE LABORATORY, LETCOMBE REGIS, REF. LRE/957/63-CA

The Letcombe Brook Project formally **OBJECTS** to this application due to the presence of protected species in the proposed buildings for demolition.

Protected species

There are known protected species on site, which this proposal would destroy. The developers own ecological report sent with the previous application for development **LRE/957/62-X** identifies bats in both the stables and the Manor House. However this report has not been attached to this application and there is no reference to them.

These buildings are used as bat roosts and are currently in use. All British species of bats are protected under the Wildlife and Countryside Act (schedule 5), the Conservation Regulations 1994 and the European Habitats Directive. Under the habitats directive the UK is obliged to protect sites that are important for bats and to identify and protect important feeding areas for bats from damage or disturbance. It is an offence to intentionally injure or disturb a bat or to damage or obstruct access to a place used for shelter or protection by bats. This includes houses or outbuildings and applies throughout the year whether bats are present or not at the time of survey or work being carried out.

Bats must be a material consideration as part of planning applications as required by PPS9. Planning authorities are obliged to enter into planning obligations to secure the protection of bats. Measures must be taken to assess whether they are present and if so ensure their habitats are protected during the planning process. An ecological assessment is recommended for all planning cases that may affect bats. As you are aware the VWHDC has responsibility for protected species under PPS9 (formally PPG9) and the council could be liable to prosecution if protected species are damaged or destroyed.

Ecosulis undertook a habitat survey (for the other planning application) and this is a preliminary broad-brush survey providing basic ecological information. It identifies that bats are present and therefore a detailed species report with mitigation measures should also be undertaken and provided **before** the application is considered.

English Nature and Protected Species

The VWHDC does not have enough ecological information or ecological expertise to assess this application within the council and English Nature which is responsible for protected species appear not to have been consulted on this application. The ecologists involved - Ecosulis Ltd in the habitat survey also suggest that they themselves should be asked to consult with English Nature to arrange for an experienced bat surveyor to visit the site.

English Nature can helpfully advise local authorities on the acceptability of the standard of the ecological surveys and work with the local authority and the developer to provide approved detailed plans of mitigation and a schedule of works. Subsequent licenses then need to be obtained from DEFRA. The assessment of the impact and identification of appropriate mitigation requires detailed technical knowledge of ecological principles, conservation legislation, practical habitat management and working conservation policy and practice and should be carried out by a competent and independent authority.

The following information is English Nature's advice in relation to developments that may have an impact upon protected species.

The presence of one or more protected species within or close to a development site is a material consideration when determining a planning application (Planning Policy Guidance PPS9)

*If protected species are suspected or present on a proposed development site then the following information should be requested from the applicant, usually in the form of an ecological survey by an appropriately qualified consultant, **prior to the planning application being determined.***

1. *What species are involved?*
2. *What is the population level at the site, or likely to be affected by the proposal?*
3. *What impact is the proposal likely to have upon the species present?*
4. *What can be done to mitigate this impact?*
5. *Is the impact necessary or acceptable?*
6. *Will a licence be required from English Nature or DEFRA?*

Applying a condition to planning permission that requires an applicant to undertake surveys after planning permission has been granted is not acceptable because the local authority cannot make an informed decision without the survey information.

Mitigation

As there is no detailed ecological report on the bats, mitigation and measures for protecting and enhancing wildlife potential have not been considered. Indeed Ecosulis's report advises the developer on this and outlines very clearly that mitigation measures should also be proposed. These can be found in English Nature's booklet on 'Bat mitigation guidelines'. They may include planning the development to avoid bat roosts by *retaining features such as buildings and trees* that are used as bat roosts or safeguarding bat roost sites within a development such as provision of entry/exit roost space where a bat roost exists earmarked for development. Where damage, destruction or obstruction is unavoidable then a licence must be granted by DEFRA which requires mitigation measures to be put forward.

Therefore in summary further surveys and detailed ecological reports should be required by the VWHDC before the planning application can be assessed, without this the planning application cannot be properly determined. Prior to an application this information needs to be assessed by English Natures Protected Species Officer Rebecca Hart and measures sought to ensure habitats are protected through the planning process, including mitigation to protect and enhance populations.

Yours sincerely



Sally Wallington
Letcombe Brook Officer

cc. Councillor Andrew Crawford
Councillor Anda Fitzgerald O'Connor
Mr Ed Vaizey MP
Mr Huw Williams, North Wessex Downs AONB

Project partners: Environment Agency, Wantage Joint Environmental Trust, Grove Joint Environmental Trust, Letcombe Regis and Bassett Parish Councils, Vale of the White Horse District Council