

**WITH OXFORDSHIRE COUNTY COUNCIL**  
**AS STRUCTURE PLAN AUTHORITY**

Report to the Head of Sustainable Development

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| <b>REDEVELOPMENT FOR A CONTINUING CARE RETIREMENT<br/> COMMUNITY, FORMER DOW AGROSCIENCES SITE, LETCOMBE REGIS</b>   |  |
| Application No: LRE/957/65-x   |  |
| District Council:<br><br>Vale of White Horse   | Applicant:<br><br>The Letcombe Manor Estate Ltd<br>(TLMEL) AND Barchester Care<br>Villages |
| <u>Development Proposed</u> (site area 4.8ha)  |  |
| <ol style="list-style-type: none"> <li>1. Outline application for the redevelopment of the site as a continuing care retirement community (use Class C2) including demolition of all buildings except the Lodge, change of use of the Lodge to village shop, rearranged access, car parking, landscaping and ancillary development; all details except landscaping are to be considered with the application.</li> <br/> <li>2. Supporting documents explain that the Richmond Villages proposal would comprise the following: <ol style="list-style-type: none"> <li>(a) 60 care bedrooms</li> <li>(b) 50 fully serviced care suites</li> <li>(c) 72 close care units</li> <li>(d) village shop (in the Lodge, staffed by volunteers)</li> <li>(e) restaurant and coffee shop (also open to village residents)</li> <li>(f) bowling green (open to village residents)</li> <li>(g) possibly a library/book club (open to village residents)</li> <li>(h) accommodation for local businesses, eg, hairdressers, again open to village residents</li> <li>(i) IT room, laundry</li> <li>(j) nature trail</li> <li>(k) 15 key worker flats (on site)</li> <li>(l) 105 parking spaces</li> </ol> </li> </ol> <p style="padding-left: 40px;">The community would accommodate around 229 residents; occupancy would be limited to people over 55 years.</p> |  |
| <u>Location</u> (see plan attached)  |  |
| <ol style="list-style-type: none"> <li>3. Former Dow Agro Sciences Laboratory site, South Street, Letcombe Regis.</li> </ol>   |  |

### Site Features Relevant to Structure Plan

4. The site is now vacant. It is occupied by a number of buildings including a former manor house, lodge and stables as well as more modern laboratory buildings, glasshouses and other structures associated with its former scientific use; the existing permitted buildings have a foot point of 9181sqm. The site lies within Letcombe Regis Conservation Area and the North Wessex Down AONB.

### Planning Policies Affecting Proposal

- 5.
- (a) Strategic Policy Area: Vale of White Horse
  - (b) Structure Plan Policies (copies available in full on request): G1, G2, G3, G6, T1, T2, T8, EN1, EN4, E1, E6, H1, H3, H4.
  - (c) Local Plan Zoning and other policies: adopted Vale of White Horse 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).

Vale of White Horse Local Plan 2011 as proposed to be modified: site allocated for redevelopment for no more than 100 dwellings. Proposals will only be permitted if in accordance with a comprehensive scheme for the whole site and where all necessary on and off-site infrastructure and service requirements are met (Policy H8B). Policy DC8 requires all development to be supported by necessary social and physical infrastructure and services. Policies to make efficient use of land, to provide a variety of dwelling types and sizes, and to secure the provision of affordable housing. Policy H18 allows for the provision of grouped accommodation to meet the special needs of the elderly in the built up areas of the 6 main towns within the District, subject to criteria. Similar policies on the AONB, Conservation Areas and listed buildings as adopted plan.

## **APPENDIX 4**

### Planning History/Background

6. 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.
7. 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:
  - “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 g[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.”
8. 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.
9. In October 2005, the Council objected to a proposal for the redevelopment of the site for residential use (99 units) on the grounds that the proposal would be contrary to the principles of sustainability guiding the location of new housing development in Structure Plan policies G1 and H1, the housing policies in the adopted and revised draft local plan and government advice in PPG3 and PPG13. The applicants appealed against non-determination of the application. The District Council resolved that had they determined the application, planning permission would have been refused for a number of reasons including sustainability grounds. The application has not yet progressed to a public inquiry.
10. In March 2006, the Vale Local Plan Inspector recommended that the housing allocation in the draft Local Plan for this application site should be increased from 44 to 100 dwellings. In his view, the site’s previously developed land status and the fact that it could be reused

for employment, possibly on an increased scale in terms of numbers of jobs and traffic movements, weighed in its favour. He also considered that a comprehensive, well designed scheme at PPG3 minimum density could enhance rather than detract from the character and appearance of the Conservation Area and may bring additional environmental benefits. In his judgement the sustainability deficiencies of the location in terms of accessibility by non-car modes are mitigated to a degree by the proximity of Wantage. This Council has raised no objections to the Proposed Modifications to the Local plan which follow the inspector's recommendations.

11. The current application is supported by a Planning Statement. This explains that Richmond Villages care community concept is based on a "hotel resort model". It aims to enable older people to live independent lives in their own space, supported by a comprehensive and flexible social, domestic and 24-hour nursing/personal care services, available in any combination on demand. The applicants intend that the community becomes an active part of Letcombe Regis, both socially and commercially; it would bring a range of facilities open to villagers.
12. The Statement also explains that the applicants would operate a minibus service for residents who wish to use facilities outside Letcombe Regis, eg, in Wantage, Oxford and Swindon. The applicants offer to run this for 5 years and open the service to village residents. They say that a bespoke minibus service, together with a wide range of on-site facilities, make the care community a sustainable proposal.
13. The applicants anticipate that about 110 staff would be employed on site (80-90 full time equivalent posts), mostly on a shift system in a variety of posts. The minibus would be used to collect/drop off staff where possible to deter travel by car. The applicants would provide 15 key worker flats on site to ensure employees do not impact on affordable housing needs.
14. An accompanying Care Accommodation Supply and Demand Study reports a need for additional care homes in the Vale and in Oxfordshire as a whole, with a projected shortfall of bedspaces of 1700 in the county by 2016 unless supply is increased. The report states that there are currently no retirement village schemes in Oxfordshire. It argues that increased life expectancy and the County's demographic and lifestyle profile will result in a need for more retirement accommodation of the retirement village type; also local house price values would provide sufficient equity to purchase a unit in a retirement village.
15. The application is also accompanied by a Transport Assessment, Design Statement, Landscape Assessment and reports covering archaeology, ecology and mitigation strategy, ground investigations, a

sustainability assessment and flood risk. (Copies of all documents are available in the office). The applicants also offer a draft S106 agreement and Travel Plan.

16. In conclusion, the applicants argue that the proposal complies with national planning policy in PPG3 and PPG13 relating to the use of previously developed land and sustainable development, it is in a relatively sustainable rural location; the provision of on-site facilities and transport links will make it a self-sustaining development; it would provide special needs housing; it would reduce built development on the site; it would not impact on Listed Buildings or the Conservation Area; it would provide public access to open space on site; the proposal would be consistent with AONB policy and it provides mitigation strategies for all protected species on site.
17. I understand that the applicants have also submitted a separate application for 13 houses on land in the northern part of the site; the Council as Structure Plan authority is not a consultee on that proposal as it is below the threshold of the direction.

#### Comments

18. The proposal is for significant development in a rural location lacking a reasonable range of services and community facilities and which is served by only a limited level of public transport. Development on this scale would normally be considered contrary to Structure Plan policies G1 and H1 and to government advice in PPG13 in that it would give rise to a need to travel, particularly by private car.
19. The adopted Local Plan provides for only minor redevelopment schemes for housing in Letcombe Regis. However, the draft Local Plan 2011 as proposed to be modified allocates the site for up to 100 dwellings. In recommending an exception to policy, the Inspector considered that the sustainability deficiencies of the village location and the impact of large scale development on the social well-being of the local community would be outweighed by the site's previously developed land status, the need to make best use of land in terms of PPG3 minimum housing density, the potential benefits of a large, comprehensive scheme, (eg, environmental improvements, a possible village shop) and the fact that the site could return to employment use without the need for permission possibly involving an increase in jobs and traffic movements over that generated by its previous use. This application is for C2 use (residential institution) rather than C3 use (dwelling houses) but it raises similar issues in terms of its advantages and disadvantages.
20. The site is previously developed (employment) land, albeit in a relatively unsustainable rural location. Para 42a in PPG3 advises that housing/mixed use applications on redundant employment sites should be favourably considered unless, amongst other things, they fail to

perform well against the following criteria:

a) location and accessibility: Letcombe Regis has very few services and facilities (a church, public house, village hall and recreation ground) and it is served by limited bus services (no evening or Sunday services) to Wantage. The proposal includes a shop, restaurant/coffee shop and bowling green plus potentially other facilities, eg, hairdressers, library, which would go some way to meeting the everyday needs of residents. The proposed minibus service would help to address the sustainability deficiencies of the site in providing access for residents to shopping, leisure and medical facilities in nearby town centres. It would also help to reduce reliance on private car by staff for journeys to work. The proposal is likely to generate a number of private vehicles trips by residents, staff and visitors but the level of traffic generation from the proposed scheme is predicted to be less than a redevelopment scheme for 100 dwellings as proposed in the draft local plan or from the reuse of the site for employment.

b) capacity of existing/potential infrastructure to absorb further development: The applicant's draft S106 agreement indicates that scheme would include an IT room and the owner may establish a library/book club. Additional demands would be likely to be placed on Wantage library unless the onsite library and IT facilities are of a suitable standard. Contributions would also be required to fire and rescue, museum storage and waste management. The Social and Community Services directorate raise concerns that residents should have the chance of care by providers other than scheme operators; it is not clear what degree of choice would be available.

c) The ability to build communities. The proposal would add a large number of residents in the 55 years plus age group to a community of about 220 households. However, the proposed development includes a number of facilities which would be open to village residents and which could help reduce the level of travel from the village, adding to the social and economic wellbeing of the community.

d) physical and environmental constraints: The District Council is best placed to assess the benefits and impacts of the proposed development on the character of the Conservation Area and the AONB.

21. The Social and Community Services Directorate support the proposals as a development which extends choice for older people and contributes additional services to a rapidly expanding retired/old population; they concur that there is a current under supply and strong future demand for accommodation for older people and question whether any affordable/social housing allocations will be included in the 72 close care units. It is also not clear what specific services would be provided on site for dementia sufferers in the nursing beds and close care suits.

22. The proposed development would provide a number of jobs for local people although the applicant anticipates that they may need to look further afield to recruit nursing and care staff. This may be a problem, given the level of local house prices. The provision of 15 key-worker units on-site would go some way to addressing this; the District Council is best placed to assess the adequacy of the arrangements for affordable accommodation in line with Structure Plan policy H3.
23. The comments of the Council as highway authority are being dealt with separately in the normal way. The Council considers that the impact of the proposal in safety and highway capacity terms would be less than a 100-unit residential development as included in the draft Local Plan (as proposed to be modified) or a regeneration of the site under its extant employment consent. The inclusion of community facilities open to residents of the development and the village provides some benefits in sustainability terms. There are however some concerns over the operational details of the proposed minibus service which may detract from the viability of the existing subsidised village bus service and make the justification for funding difficult; this needs to be discussed further with the applicant. If the District is minded to grant permission, it should be subject to conditions, a S106 agreement to secure the provision of the minibus service and the implementation of a Travel Plan.
24. In conclusion, the proposed development is contrary to Structure Plan policies G1 and H1 in that it is a significant development in an unsustainable rural location. However, in view of the Local Plan Inspector's views, the Council has raised no objections to the proposed modifications to the Local Plan which allocate the site for 100 dwellings. The current proposal would have less impact in terms of traffic generation than 100 dwellings (or a return to employment use) and arguably would bring greater social and economic benefits to the village than the alternative uses. I therefore recommend that the Council raises no objection to the proposal provided that planning permission is subject to a legal agreement to secure contributions to all necessary supporting transport and service infrastructure and to the implementation of a Travel Plan.

#### Notes

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

**Recommendations**

25. It is **RECOMMENDED** that the County Council as Structure Plan authority informs the Vale of White Horse District Council that it has no objection to the development proposed in application No. LRE/957/65-X provided that planning permission is subject to:
- a) a S106 agreement to secure contributions to all necessary supporting transport and services infrastructure and;
  - b) the implementation of the Travel Plan.

*Recommendation endorsed by the  
County Council's Cabinet Member  
for Sustainable Development.*

Date 10 May 2005

Dealt with by Linda Currie

File 8.4/3886/2





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## APPENDIX 5

Tel: 01865 815700  
Fax: 01865 815085

9<sup>th</sup> May 2006

Your ref: LRE/957/65-X

**Direct line: 01865 815729**

**Please ask for: Tim Foxall**

tim.foxall@oxfordshire.gov.uk

Dear Geraldine

**Proposal:** Redevelopment of the site as a continuing care retirement community, change of use of The Lodge to village shop, re-arranged access, car parking, landscaping and ancillary development with demolition of all buildings except The Lodge.

**Location:** Letcombe Laboratory, Letcombe Regis

**Application No.:** LRE/957/65-X

Thank you for your consultation on the above planning application which in brief proposes the demolition of all existing buildings on the existing Letcombe Laboratory site, with the exception of The Lodge and their replacement with a continuing care retirement community comprising 60 care bedrooms, 50 fully serviced care suites, 72 close care units, 105 parking spaces, accommodation for 15 key workers, a new village shop and ancillary facilities.

Having visited the site and looked at the information accompanying the application, I write with the Highway Authority's comments on the proposals as currently detailed.

### ***Traffic Generation***

When considering any application, one of the Highway Authority's primary interests as 'guardian' of the highway network is to ensure that the existing network can accommodate any intensification of traffic movements which may arise from a proposed development and further that the network will not be unduly compromised through the need to accommodate additional movements as a facet of a site being poorly located in terms of sustainability.

Given this and the considerable planning history surrounding the site, one of the key points for consideration in this instance is the relative traffic generation which would/could arise

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**Director for Environment & Economy**

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**Head of Transport**

from the redevelopment of the site under a variety of scenarios which have, to date, been proposed.

The Transport Assessment which accompanies the application looks at this issue in some considerable detail and duly compares the quantum of traffic that is likely to be generated by residential developments on the site of 44 and 100 dwellings, against that which would be generated by the site if it were to be 'fully built out' as a class 'B1' business park, which the Highway Authority understand could be lawfully achieved without the need for further planning consent.\* These assessments are then quantified against the estimated level of traffic generated by the site under its existing use (when operational).

*\* Note: The reuse of the site without the need for further planning permission is a key consideration when assessing this development. If therefore the Highway Authority is misguided in its assumption that the site could be re-used for B1 office development without the need for further planning permission, then it reserves the right to amend its comments accordingly.*

Albeit that the Highway Authority does not fully concur with some of the assumptions made within the Transport Assessment, specifically the quantum of existing floor area which the applicant has assumed could be re-occupied as B1 office space, it is satisfied that the broad methodologies applied are sufficient for the purposes of the assessment.

On the basis of the above, although the Highway Authority do not agree with the specific percentage differences between the traffic generated by each of the development options, it does agree that the continuing care retirement community will generate proportionally less traffic than both a 44 dwelling development and indeed a 100 dwelling development. Further, at the request of the Highway Authority, the applicant has undertaken sensitivity tests which assume a higher than anticipated proportion of car journeys made to the site. This has revealed that although AM peak flows would then exceed those generated by a 44 unit residential development, both PM peak and overall daily flows to the care community remain lower.

For ease of reference, the table below has been extracted from the Transport Assessment and illustrates the anticipated traffic flows from the various scenarios outlined above.

| Period  | Care Community | Dow Agro Sciences |                 | 44 Dwellings* | 100 Dwellings* |
|---------|----------------|-------------------|-----------------|---------------|----------------|
|         |                | Historic Use      | Fully Built Out |               |                |
| AM Peak | 34             | 100               | 168             | 35            | 78             |
| PM Peak | 28             | 83                | 138             | 38            | 85             |
| All-Day | 376            | 635               | 1070            | 466           | 1049           |

- *Uses trip generation estimates to which the applicants do not agree*

Beyond simply the quantum of traffic accessing the site on a daily basis, the Highway Authority also consider it important to evaluate the type of traffic accessing a site. In this instance given the nature of the surrounding road network, the Highway Authority would seek to keep heavy goods vehicle movements to the site to a minimum. It is therefore considered that a care community of the nature proposed provides benefits of this nature, certainly over a commercial development, if not a residential development.

The Highway Authority understand that there are an additional 13 residential units proposed at the north of the site which will come forward under a separate application. Albeit that the Authority would have preferred to see this element presented within the current application, it does not consider that the additional traffic generated will materially change the overall impact upon the highway network and would not therefore exceed the traffic generated by a 100 unit development even when combined with the traffic generated by the community care village.

In summary, even if the trip rates which have been used are 'manipulated' to take account of a lower employee density at a research and development facility (i.e. the most recent use of the site) or a higher trip rate than anticipated proportion of car journeys to the development, it can be seen that a B1 office development would generate significantly more traffic both throughout the day as well as in the peak hours than a residential development of 44 or 100 units or indeed crucially in this case a care community.

### **Sustainability**

Letcombe Regis is relative remote from Wantage, the nearest market town and by virtue of this, relatively remote from significant facilities and amenities. As such, regardless of the scale and nature of forthcoming development on the site, the Highway Authority considers sustainability to be a considerable issue.

However, to some extent, the Vale Local Plan Inspector has dispelled the concerns of the Highway Authority over the sustainability of the site through the following comment; '*...the sustainability deficiencies of the village location in terms of accessibility by non car modes are mitigated to a degree in this instance by the relative proximity of the much larger settlement of Wantage.*' On this basis, the Highway Authority does not consider it appropriate or indeed necessary to challenge the Inspector with respect to his view on this matter.

It is noted that the applicant proposes to operate a minibus service to Wantage at least 5 times per week subject to licensing and agreement of the local bus operator, which could also be open to Letcombe Regis residents at a nominal rate. Albeit that it is recognised that this would go some way to overcoming the sites unsustainable nature, following consultation with the County's Public Transport Development Team, there are some concerns over this proposal. Firstly, the existing bus service through the village is subsidised by the County and therefore it is considered that a further bus service may detract from the viability of the existing service and make justifying existing funding more difficult.

Indeed, the existing bus services operate considerably more frequently than the proposed service and certain services have 'low floor' vehicles which facilitate access by wheel chairs and the infirm. As such, it is the opinion of both the Highway Authority and the Public Transport Development Team that residents of the care community would be able to use the existing bus service and that a joint funding venture maybe a more appropriate way forward.

It was understood however from meeting with the applicant, that the proposed service would be a great deal more flexible than that which is outlined in the literature accompanying the application and would operate more along the lines of a Dial-a-Ride facility for staff and residents operating throughout the day not simply between 08:00 – 18:30 and thus without a prescriptive timetable. If this were to be the case the Highway Authority would consider this a

more appropriate service and indeed could be opened up to a wider catchment area, although again this may undermine the viability of the existing bus service.

It is noted in the draft S106 that the mini bus service is proposed for a minimum of 5 years. The Highway Authority considers that a service such as this should be provided for perpetuity to avoid the undermining of the sites sustainability at any point in the future.

In summary, the Highway Authority are not confident that the service as currently detailed is the most appropriate and therefore requests that the applicant consults with the Public Transport Development Team in order to arrive at the most suitable solution.

The Local Plan Inspector also recognised that *'some improvements to local bus services and walking/cycling links to Wantage are practical and realistic in connection with (and to be funded by) development on this site'*, a view shared by the Highway Authority.

The Highway Authority also consider that there are merits of having additional facilities within the care community which are available for the wider community as this will help reduce the need to out of village journeys to be undertaken.

The Draft Travel Plan is considered a laudable step towards promoting the sustainability of the site, however it appears to be weak on 'hard measures' to encourage the use of alternative means of travel to the site in terms of off-site improvements as the Local Plan Inspector alluded could be delivered as part of the redevelopment of the site. The Highway Authority notes the applicant's intention to provide targets for the restraint of single occupancy car journeys to the site following the initial site survey and would seek for the S106 to include a mechanism of financial penalty for not meeting the agreed targets in the future.

### ***Parking Provision and Internal Layout***

The County do not have a specific parking standard for this form of development and rather assess each case on its merits. It is proposed to provide 105 parking spaces albeit it would appear that from the proposed traffic generation, a considerable proportion of these will be vacant on a day to day basis. It is noted that this apparent over provision is for the purposes of being able to accommodate the additional traffic generated by special events such as school concerts. However, it is unclear where traffic generated by such events currently parks and therefore, the Highway Authority consider that 105 spaces could be regarded as an over provision. *(This implies that the facilities may be hired out and the applicant should clarify this or the Planning Authority should consider a condition to restrict the hiring out of the facilities.)*

In terms of the internal layout of the site, the scale of the drawings provided does not facilitate detailed comment albeit it appears broadly satisfactory. The Highway Authority would however like to take this opportunity to stipulate that all the internal roads and junctions including footways, lighting and crossings are to be constructed to the standard specification of the Highway Authority and the extent of any adoption should be discussed at as early an opportunity as possible.

## ***Conclusions and Recommendations***

In conclusion, the Highway Authority does not wish to object to the application as currently detailed, on the grounds that it believes that the impact of the care community will not be significant in transport and highway terms and indeed will be less detrimental to the highway network in terms of both safety and capacity than either a 100 unit residential development (as considered appropriate by the Vale Local Plan Inspector and included in the Proposed Modifications to the Plan) or indeed a regeneration of the site under its extant permission.

The inclusion of community facilities within the development which will be available for both residents of the development and Letcombe village itself is considered to provide some laudable sustainability merits. However the Highway Authority do have concerns over the mechanics of the proposed mini bus service and would request that this is discussed in further detail before being encapsulated within the Section 106 agreement.

Should the Vale of White Horse District Council be minded to grant planning permission, the Highway Authority request, in addition to the requirements of any S106 agreement, the inclusion of the following conditions;

- 1) The development hereby permitted shall be constructed in accordance with proposed site layout (drawing No. 0280.1.5).
- 2) The development hereby permitted shall not be occupied until the construction of the roads serving the development, including access junction, footways and verges, has been undertaken in accordance with the standard specification of the Highway Authority.

I hope you will take these comments into consideration when determining the application and should you wish to discuss any of the points raised in further detail, please do not hesitate to contact me.

Yours sincerely

Tim Foxall  
*Principal Transport Planner*



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**Location:** Letcombe Laboratory, Letcombe Regis

**Application No.:** LRE/957/65-X

Further to my letter of 9<sup>th</sup> May regarding the above development, I have consulted further with the County's Public Transport Development Team with respect to the proposed provision, by the developer, of a mini bus service. At the time of my previous letter, it was considered that such a service could be detrimental to existing 'public' bus services through the village and that a joint venture to expand existing public transport services maybe more appropriate.

However, following further discussions and feedback from other similar establishments elsewhere, it is felt that a mini bus service operated by the care community is likely to afford residents a more accessible service and indeed is likely to be able to accommodate passengers who require an element of close care better than a general public service. As such, it is the view of the County as Highway Authority that the mini bus service should be pursued as a site-specific facility, NOT made available to the wider residents of Letcombe Regis, so that revenue from public services is protected. I believe that my colleague, Alan Pope, has already indicated to you that the information regarding the current level of bus services to and from Letcombe Regis contained in the developer's Planning Statement contains erroneous information.

Further, it is considered that there is considerable scope to enter into some form of joint venture with the voluntary Wantage IAC scheme, a project which focuses particularly on the

**Richard Dudding**  
**Director for Environment & Economy**

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**Head of Transport**

travel needs of the elderly and which both your authority and ours support through annual revenue funding. The Highway Authority would welcome further discussion on this issue.

The Highway Authority consider that it is of paramount importance that the S106 agreement seeks to ensure the long term provision of site specific transport and would recommend that such provision is made for the lifetime of the development, not solely a minimum of 5 years especially given the remote location of the site itself.

Furthermore, the Highway Authority requires a contribution from the developers of £40,000 towards sustainability measures, to include local public transport bus service subsidy, and walking and cycling infrastructure. It would further seek a contribution to mitigate the extra call by residents of your development on the resources of the Wantage IAC scheme, estimated by that organisation as an additional £3,000 per annum. This of course would be an annual cost ad infinitum and so we have capitalised this cost over a 25-year period. This amounts to £75,000.

I hope you will take these comments into consideration when determining the application and should you wish to discuss any of the points raised in further detail, please do not hesitate to contact me.

Yours sincerely

Tim Foxall  
*Principal Transport Planner*

**Our Ref :** WA/2006/012523-1/1

**Your Ref :** LRE/957/65-X

**Date :** 16 May 2006

Environmental Services Directorate  
Vale Of White Horse Council  
The Abbey House  
Abingdon  
Oxfordshire  
OX14 3JN

*Letter from  
Environment Agency*

Dear Geraldine

**REDEVELOPMENT 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, OXON OX12 9JT**

**REF.: LPA19/2 (16)**

Thank you for referring the above application which was received on 21 April 2006.

The site investigation submitted with the previous application ref. LRE/957/62-X was not adequate to determine the nature and extent of any contamination on site. Groundwater and the Letcombe Brook are potential receptors and should be accounted for in further investigations. Groundwater sampling and testing should be carried out, irrespective of whether significant elevated contamination levels were found in the soils. Groundwater should be tested for a suitable suite of contaminants (such as TPH, pesticide and other agricultural chemicals) in the immediate vicinity and down the hydraulic gradient of the chemical stores, fuel and heating oil tank.

The report lists a potential source of contamination is the use of the site for agricultural research laboratories. This has not been fully investigated in the report ref. Ground Investigation report number 9143 dated March 2004 carried out by RSA Geotechnics Ltd.. More detail is required regarding the nature and location of any contaminating activities carried out at these laboratories. Sampling for a suitable suite of contaminants (such as pesticide and other agricultural chemicals) is required at the laboratories.

No desk top study or site investigation has been received for this application.

We have no objections, in principle, to the proposed development but recommends that if planning permission is granted the following planning conditions and advice are imposed:

**CONDITION:** No development approved by this planning permission shall be commenced until:



a) A desktop study has been carried out which shall include the identification of previous site uses, potential contaminants that might reasonably be expected given those uses and other relevant information. And using this information a diagrammatically representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors has been produced.

b) A site investigation has been designed for the site using the information obtained from the desktop study and any diagrammatically representations (Conceptual Model). This should be submitted to, and approved in writing by the LPA prior to that investigation being carried out on the site. The investigation must be comprehensive enough to enable:

- a risk assessment to be undertaken relating to groundwater and surface waters associated on and off the site that may be affected, and
- refinement of the Conceptual Model, and
- the development of a Method Statement detailing the remediation requirements.

c) The site investigation has been undertaken in accordance with details approved by the LPA and a risk assessment has been undertaken.

d) A Method Statement detailing the remediation requirements, including measures to minimise the impact on ground and surface waters, using the information obtained from the Site Investigation has been submitted to the LPA. This should be approved in writing by the LPA prior to that remediation being carried out on the site.

**REASON:** To ensure that the proposed site investigations and remediation will not cause pollution of Controlled Waters.

**CONDITION:** Upon completion of the remediation detailed in the method statement a report shall be submitted to the LPA that provides verification that the required works regarding contamination have been carried out in accordance with the approved Method Statement(s). Post remediation sampling and monitoring results shall be included in the report to demonstrate that the required remediation has been fully met. Future monitoring proposals and reporting shall also be detailed in the report.

**REASON:** To protect Controlled Waters by ensuring that the remedied site has been reclaimed to an appropriate standard

**CONDITION:** The construction of the foul drainage system shall be carried out in accordance with details submitted to and approved in writing by the Planning Authority before the development commences.

**REASON:** To prevent pollution of the water environment.

**NOTE:** All sewage or trade effluent should be discharged to the foul sewer if available subject to the approval of Thames Water Utilities or its sewerage agent. It is advisable to fit a fat trap to the restaurant to prevent the foul sewer becoming blocked.

After reviewing the submitted Flood Risk Assessment from Glanville dated March 2006 (ref. CV251092) we have no objections on flood risk grounds subject to the following condition:

**CONDITION:** Prior to development commencing drainage details, incorporating sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, shall be submitted to and approved by the local planning authority, and the scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

**REASON:** To prevent the increased risk of flooding and to improve water quality.

**NOTE:** No soakaways should be constructed such that they penetrate the water table, and they should not in any event exceed 2 metres in depth below existing ground level. No soakaways shall be constructed in contaminated ground. Any SuDs from car or lorry parking areas would need to incorporate suitable measure for the protection of water quality, this is likely to include measures to mitigate the discharge of hydrocarbons to ground or surface water. Details of treatment techniques are outlined are in Ciria Report C609 **REASON:**  
To prevent pollution of groundwater.

**CONDITION:** Prior to commencement of development a planting scheme and ecological management plan for the lake margins and Letcombe brook, shall be submitted to, and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in accordance with a programme for planting and maintenance related to stages of completion of the development.

**REASON:** To protect, and enhance the natural features of importance within or adjoining the watercourse and to enhance the ecological value of the water course and lake

**NOTE:** Planting of suitable marginal and aquatic species within the watercourse and lake should be undertaken. Any plants used within the river, lake and within the riparian corridor, should be native species of local provenance.

**CONDITION:** A buffer zone alongside the Letcombe Brook shall be established in accordance with the ecological management plan. Details shall be submitted to and approved in writing by the Local Planning Authority before the development commences.

**REASON:** To maintain the character of the watercourse and provide undisturbed refuges for wildlife using the river corridor.

**NOTE:** Details of the buffer zone should be submitted prior to agreeing the site layout.

Water Vole has been recorded locally on the Letcombe Brook. Given the potential for Water Voles to be present, the following condition is recommended;

**CONDITION:** Prior to commencement of development a survey for Water Voles shall be undertaken and submitted to the local authority for approval.

**REASON:** The Water Vole is protected under the Wildlife and Countryside Act 1981.

**NOTE:** If water voles are present here, they are known to burrow approximately six metres into the banks, so it is important to prevent machinery from entering the buffer strip and to prevent materials being stored there, and to prevent any works carried out which may involve physical damage to the watercourse or any water feature.

The White Clawed Crayfish has been recorded in this stretch of the Letcombe Brook. Siltation and pollution from development sites can seriously affect this species. We understand a method statement is currently in preparation to prevent pollution of the brook occurring during the development of the site. We should be consulted on the methods to prevent pollution and also whilst works are ongoing..

**CONDITION:** Prior to commencement of development a method statement shall be submitted and approved by the Local Authority, detailing the phasing of development and pollution prevention measures.

**REASON:** To prevent pollution of the water environment which may be detrimental to the

## APPENDIX 6

White Clawed Crayfish which is protected under the Wildlife and Countryside Act 1981 and the Conservation Regulations 1994.

(Note: We ask to be consulted on any details submitted in compliance with the above conditions).

## **PLANNING INFORMATIVES**

The following planning informative should be attached to any planning permission granted:

Culverting or any works which affect the flow of a watercourse require the prior written approval of the Local Authority under the Public Health Act 1936, and the prior written consent of the Environment Agency under the terms of the Land Drainage Act 1991/ Water Resources Act 1991. The Environment Agency seeks to avoid culverting, and its consent for such works will normally be withheld.

## **ADVICE TO PLANNING AUTHORITY**

The felling of larger trees will require a bat survey and appropriate measures should be taken to protect bats during the demolition and construction phase. The felling of any tree or removal of any vegetation likely to provide a habitat for nesting birds must not be carried out in the birds breeding season, between the months of March and August inclusive.

All British bat species are protected under the Wildlife and Countryside Act 1981 and the Conservation Regulations 1994. All birds, bird nests and their eggs are protected under the Wildlife and Countryside Act 1981. These surveys should be assessed by English Nature.

## **ADVICE TO APPLICANT**

Any above ground oil storage tank(s) should be sited on an impervious base and surrounded by a suitable liquid tight bunded compound. No drainage outlet should be provided. The bunded area should be capable of containing 110% of the volume of the largest tank and all fill pipes, draw pipes and sight gauges should be enclosed within its curtilage. The vent pipe should be directed downwards into the bund. Guidelines are available from the Environment Agency.

Roof water downpipes should be connected to the drainage system either directly, or by means of back inlet gullies provided with sealing plates instead of open gratings.

Spring areas have a very shallow water table. The applicant is advised that in such areas any sub-surface structure such as foundations may impinge upon the water table and obstruct groundwater flows. This may lead to a build-up of water levels and water logging problems on the up-gradient side of the obstruction may result. The applicant should not obstruct the groundwater flow feeding any spring or the surface water flow from any spring. The applicant is advised to devise a scheme of land drainage or landscaping which allows groundwater to bypass any impeding structure, and which allows flow from springs to continue unobstructed. Many springs are ephemeral i.e. flow in wet periods only. These should be treated as above.

## **Waste**

# **APPENDIX 6**

Under current legislation developers have a Duty of Care, which requires all wastes to be handled, recovered or disposed of responsibly. Records should be kept on site to demonstrate the Duty has been adhered to. Similarly, for hazardous wastes, copies of consignment notes should be kept. Agency Officers may audit these records during the demolition/construction phase.

More detailed information on these requirements can be found on the Agency's website, [www.environment-agency.gov.uk/netregs](http://www.environment-agency.gov.uk/netregs). This is to prevent pollution and to minimise the illegal disposal of waste.

The first part of the Hazardous Waste regulations came into force on 16 April 2005, with the requirement that where hazardous waste is produced at or removed from any premises other than exempt premises, the premises must be notified to the Environment Agency. This means that any business producing hazardous waste has a legal duty to register with us as a Hazardous Waste Producer. See the Environment Agency website [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) for further details.

Yours sincerely

**FRANCES JOHNSON**  
**Planning Liaison Officer**  
[frances.johnson@environment-agency.gov.uk](mailto:frances.johnson@environment-agency.gov.uk)

CC: Mary Power Savills

**APPENDIX 6**

McCoy Associates Chartered Town Planners

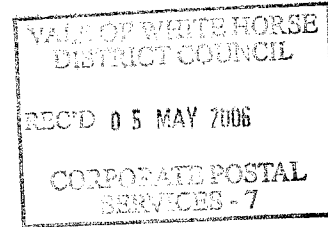
54 New Street • Henley-on-Thames • Oxon RG9 2BT • Tel: 01491 579113  
Fax: 01491 410852 www.mccoyassociates.co.uk email: denis@mccoyassoc.co.uk

4 May 2006

Your ref LRE/957/65-X

For the attention of Alison Blyth

Assistant Director (Planning)  
The Vale of White Horse District Council  
PO Box 127  
The Abbey House  
ABINGDON OX14 3JN



Dear Sir

re: **Letcombe Laboratory, Letcombe Regis, Wantage  
Redevelopment of the site as a continuing retirement community (Use Class C2), change of use of The Lodge to village shop (Use Class A1), rearrange access, car parking, landscaping and ancillary development together with demolition of all buildings except The Lodge. (Site area 4.79 hectares)**

Thank you for the drawings of this project received on 26 April which was discussed at the Architects' Panel on 3 May and on which you have requested design comments.

This is a proposal whose design has been carefully considered and which is impeccably presented. In my judgement the resulting townscape and landscape are likely to be of the highest quality.

Notwithstanding what is shown on one of the drawings you have been assured that the scheme is not to be a gated community. Rather its communal facilities are to be available to all villagers – and the paths through the site are to link with the established footpath pattern.

It is clear to me that both the character and the appearance of the conservation area of which the site forms part would be enhanced by this proposal. Consequently I have no hesitation commending its design and layout to Members.

Your papers and drawings are returned with this letter.

Yours faithfully

A handwritten signature in black ink that reads "Denis McCoy".

McCOY ASSOCIATES

**This letter refers to drawings nos: site plan, site layout 0280.1.5 of Dec.05, and architects' design statement date stamped April 2006**

## **Architects Advisory Panel**

Plan Number LRE/957/65-X

**Proposal**      *Redevelopment of the site as a continuing retirement community (Use Class C2), change of use of The Lodge to village shop (Use Class A1), re-arrange access, car parking, landscaping and ancillary development together with demolition of all buildings except The lodge. (Site Area 4.79 hectares)  
Letcombe Laboratory, Letcombe Regis, Wantage, Oxon  
OX12 9JT*

**Comments**

*Very attractive scheme.  
Panel's only concern is the extent of the development*

*The panel recommended that so far as layout, design and external appearance are concerned the above proposal should be:*

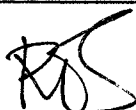
*Approved*

*Deferred for negotiations*

*Approved with Conditions*

*Refused*

Signed



Date

*3/5/06*

# 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

*rec. by email  
9/6/06*

2 June 2006

Dear Mrs LeCointe

**RE: Proposed erection of care community village, use of lodge as shop, and demolition of buildings at Letcombe Laboratory Site, Letcombe Regis. Ref: Nos LRE/957/65-X, 06/00446/OUT**

Please find below the comments from the Letcombe Brook Project on the developers application. The comments below are in response to the Savills' main document and also to the supplementary document the Ecological and Landscape Management Plan. I have also as you requested considered our requirements for inclusion to the Section 106 Agreement and conditions regarding potential Landscape Reserved Matters.

In general I would like it noted that I disagree with the planning inspector's decision in respect to this site especially on the scale and size of developments that could be permitted.

Please note, as you are no doubt aware there are discrepancies in what is proposed in the main document regarding conservation and landscaping and the supplementary document. My comments regarding the ecological and landscape issues are therefore written in response to the Ecological and Landscape Management Plan, as I understand that this is the most relevant document.

## **1. Savills' Main Document**

### **Surveys – Protected Species**

Further to our concerns about potential protected species (see previous correspondence) on this site we reiterate the need for pre-application surveys on protected species to be carried out and assessed. Without this information the application cannot be properly determined. Granting permission without this information may lead to destruction of populations or habitats, of which VWHDC councillors could be liable to prosecution.

The applicant's ecologist Ecosulis has suggested general mitigation statements however these will be required to be specific for the work proposed on site especially banks of the Letcombe Brook for crayfish. It is not clear what the proposal is say for the treatment of the banks below the dam. We are still awaiting a survey for the crayfish suggested (by the applicant), to be undertaken in July 2006. No work should therefore be permitted to the lakes

or banks of brook until the detailed design proposals have been agreed in consultation with the EA, Letcombe Brook Project and English Nature (if necessary).

**Bat survey** – a survey has been undertaken for the buildings but not for the trees. This should be required along with clear plan of which trees are to be retained and which are to be removed. It is very difficult to tell from the presented plans. Unless there is a bat survey of the existing trees how can the development impact on this protected species be assessed? The planning application cannot be fully determined without this information, as we have requested before in previous correspondence on this site.

**White Clawed Crayfish** - I recommend that we assume crayfish are present, as Angela Walkers' (ecologist) river corridor survey has made note of existing burrows. Therefore we recommend that council request detailed proposals for the treatment of the bank which incorporate detailed proposals for mitigation along with proposals for protecting and enhancing habitat for the species and agreed with relevant consultees. Effective improvements can be made at minimal cost.

**Water vole** – survey required as desilting of the lake and bank work could obviously have an impact on this species. We require a survey or the results of the survey are provided as suggested by Ecosulis would be undertaken in April (see Ecosulis report pg 8 para 6.2).

Therefore 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.

#### **Para 6.14**

Statement .....*'The draft mitigation statement has been approved in principle by English Nature.'* Having spoken to Rebecca Hart (Species Officer) at English Nature, I understand that she has not seen details of the survey (still required) and as stated in her letter that she cannot comment fully at this stage. Savills' therefore have wrongly interpreted English Nature's response. English Nature are required to see protected species surveys, along with the mitigation statements.

#### **Arboricultural Assessment - Para 6.6**

Statement *'..Further impacts to trees within the survey area will depend on extent of proposed landscaping works and should be looked at on a case- by -case basis as the development proceeds.'* Unless there is a bat survey of the existing trees how can the development impact on this protected species be assessed?

**Para 7.5** Arboriculturist calling for a detailed assessment of the trees. Statement ....*'to provide a detailed bat survey to assess potential to harbour bat roosts and a coordinated strategy of remediation and mitigation formulated'*. If this has not been undertaken then it must be before planning permission can be given.

#### **Sustainability Assessment Para 6.16 and Section 3 Appendix 2**

It is interesting to note that on speaking to Savills that the density index data they imputed into the assessment was for 72 close care units and does not take into account the additional 60 care bedrooms and the 50 close care units. Presumably therefore the checklist scores would look different to those presented. As it stands based on only 72 units - climate change and energy currently scores only 53%!

#### **Design of Care Community Proposal - Para 8.65**

*...It also produces an appropriate setting in front of the Letcombe Brook.'* Buildings on the plan abut right up to the Letcombe Brook, moved forward of existing footprint, these should be set back. However I understand that this may now be a corridor, which we would support, with a condition that the public are physically restricted from getting into the brook either by a hedge or fence. See condition and rationale below.



## **Section 106 Agreement and conditions**

The Letcombe Brook Project and our partners the Environment Agency have been able to work with the developers to progress a plan that we can take forward and build on. The Letcombe Brook Project requests that the following points are made conditional in the Section 106 Obligations and Landscape Reserved Matters. Many of these are included in the applicants Ecological and Landscape Management Plan.

However we would like to see further additions made to make sure that habitats and species are protected and enhanced, with the potential impacts of the development on biodiversity being fully considered and appropriate mitigation measures put in place, thereby making sure a positive and sustainable legacy is left for future generations.

### **Nature conservation management plan and landscape plans**

- Nature conservation/ landscape management plan to include landscape, habitat improvements, short and long-term management of features, public access and water level management. This is extremely important as it affects the rest of the 11km of brook downstream. Also incorporating into one working document Ecosulis's report survey, mitigation, recommendations and the Ecological and Landscape Management Plan (incorporating A Walkers, recommendations on Letcombe Brook and lake proposals). Plan to be agreed and approved by EA, Letcombe Brook Project and other appropriate consultees.
- Ongoing plan to be reviewed and continual enhancement of management responses to benefit ecological habitats. We need to ensure that the proposed approved nature conservation plan delivers the ecological, landscape and public access benefits over both the short and long term life of this development.
- Detailed design proposals and programme of works for ecological and landscape enhancements submitted with landscape plans. To be agreed and approved by EA, Letcombe Brook Project and other appropriate consultees.
- Use of indigenous plant species within the brook and corridor using local provenance.

### **Protected species**

- Bat survey of all trees, and mitigation and method statement prepared if found. To be carried out before felling before planning permission is granted. Upon findings manage existing tree stock for ecological and landscape benefit.
- Prior to and during works - demolition of buildings, removal of trees, works to banks of the lake and brook, the site should be surveyed and work supervised by on site ecologist to allow rescue or safe evacuation of protected species as outlined in mitigation statements. Condition habitat improvements and mitigation statements as outlined in Ecosulis report on protected species.
- Timing of tree removal - Both the arboriculturist and ecologist recommend that all tree and scrub clearance should be undertaken outside the bird-nesting season (March to August inclusive). Indeed it is a legal requirement as all birds are granted legal protection under the Wildlife and Countryside Act 1981 protecting their eggs and nests whilst being built or in use. Works to trees with bat roost ideally undertaken September/October with DEFRA licence.

- Habitat improvements drawn up for water vole, bullheads, brook lamprey, and brown trout and incorporated into detailed design plans. Detailed and site specific mitigation statement drawn up.
- Water vole, white-clawed crayfish (dawn/dusk), bullheads, brook lamprey, brown trout surveys immediately prior to and during any works on site along brook and lake.
- Mitigation for crayfish – a mitigation statement should be prepared with the assumption they are present. Therefore we can build in protection and improvements now (all at minimal cost) and if found during construction have identified a rescue package which would mean that a licensed ecologist can rescue and relocate to an agreed location without lengthy delays to get EA and EN involved. Mitigation will therefore require an ecologist supervises on site works to the brook and lake.

### Letcombe Brook and lake

- Desilting of lake and removal of silt **with method statement approved by EA.** Optimum time for desilting would be August.
- Remodelling of lake to form a chalk stream channel and to take the lake off line.
- Remodelling sections of Letcombe Brook with modified bank and bed sections for ecological benefit, with emphases on protected species.
- Creation and maintenance of 2m buffer strip in front of brook, lake and new channel to protect water vole and new features from disturbance.

### Public access

- Detailed design to create a positive balance of habitat protection and public access – **no public/community access area on west side of lake and brook, as recommended by A Walker in plan.** There is the potential for over 350 people including residents and staff plus additional local people accessing the site through permissive access and use of the open space within the development. This needs careful consideration so that we can minimise the impact and disturbance people have on the site.
- At the point below the dam on proposed corridor and new channel **the public should be physically restricted from getting into the brook**, either by a hedge or fence running alongside. They would still be able to see the brook.

The section below the dam is potentially the most sensitive section/habitat on site. It will become one of very few in sections in Letcombe Regis where the public have access to the brook and consequentially attract a lot of pressure on it. It is a very short section and very shallow and no doubt will be extremely attractive to children who wish to explore the brook. However the very protected species we are trying to protect and provide habitats for - water vole and crayfish, bullhead, brook lamprey will become extremely vulnerable. Proposed mitigation works such as placing boulders and stones in the brook for refuges for crayfish and bullheads soon gets disturbed as they are moved to form mini dams. Disturbance by people and dogs can be hugely damaging and has serious implications for our wildlife. Opening up this site to people (350 residents and staff plus local people) will have implications for wildlife and we need to consider how to manage this aspect carefully.

- Gifting the 'DOW Nature Reserve' land to BBOWT with a commuted sum for long-term management.

- **Covenant not to build on the west side of the lake including woodland.**

### **Development construction and ongoing site management**

- Agreement of site management practices with Barchester Care Villages to ensure implementation of best practice procedures.
- Provision of skilled staff team by Barchester, responsible for site and landscape management, litter collection.
- Prevention of damage or pollution to the brook corridor before and during or after through adoption of best practice procedures, following preparation of an informed Construction Environmental Management Plan.
- Management of existing environmental problems discouragement of waterfowl feeding and eradication of Japanese Knotweed. **No feeding of waterfowl to be permitted.** If people feed the ducks, geese etc then feral populations will congregate here and cause enormous damage to the environment. Problems caused to the ducks themselves include overcrowding, unnatural behaviour, poor nutrition and health and environmental health issues such as attracting rats, spread of disease, and pollution.

The Letcombe Brook Project is currently working with the VWHDC's Environmental Health Department on a campaign to raise awareness about the problems caused by feeding ducks. Problems caused by ducks also cost money £26,000 in Wantage alone to repair erosion to banks.

### **Public information**

- Letcombe Brook Project would like to see as requested an interpretation board and leaflets to assist in the management of the lake and brook, describing the types of wildlife people might see and how they can help protect the environment. Request a sum of £2500 to undertake this as we are undertaking downstream through Wantage and Grove on specific sites.

I hope this is useful and look forward to discussing this with you next week.

Yours sincerely

Sally Wallington  
Letcombe Brook Officer

**cc. Craig Blackwell, Oxfordshire County Council  
Pedro Collins, Chris Booth, Environment Agency  
Terry Quinlan, Chair of Planning, VWHDC, Mary Lambe, Landscape Department, VWHDC  
Councillor Jenny Hannaby, Councillor Andrew Crawford, Councillor Joyce Hutchinson**

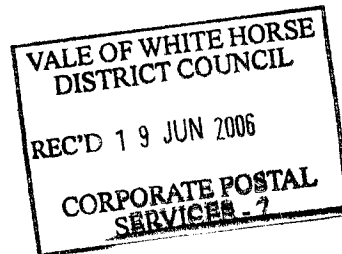
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*Project partners: Environment Agency, Wantage Joint Environmental Trust, Grove Joint Environmental Trust, Letcombe Regis and Bassett Parish Councils, Vale White Horse District Council.*

15 June 2006  
Letter to Vale 15th June as sent.doc

savills

Head of Planning  
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For the attention of : Ms G. LeCointe

Dear Geraldine,

**FORMER DOW AGROSCIENCES SITE, LETCOMBE REGIS: Ecology**

Further to our meeting on Friday, here is our response to the points you raised.

**1. Incursion outside the 'previously developed area'**

(a) patio of core building

We have removed the patio so that there is no 'built development' outside the 'previously developed area'.

(b) road around bowling green

We have rearranged this part of the site to ensure that the road remains within the 'previously developed area.'

(c) hedgerow around south west corner of the site

We do not propose any 'built development' outside this part of the site and the boundary treatment we discussed in the meeting is hedgerow.

The hedgerow was proposed by Mike Habermehl to provide a framework for landscape transition and to 'anchor' tree planting. The functions of the planting proposals within the southern site area include provision of long-term landscape structure and visual filtering from the wider countryside. The hedgerow and tree planting measures can be substituted with free-standing parkland clump tree planting set further away from the buildings, whilst providing an equally valid landscape response to site requirements.

Please find attached a revised plan which demonstrates that the built development is now fully within the area defined by your emerging local plan.

**2. Ecology**

(a) masterplan drawing to accompany the landscape and ecology management plan

Mike Habermehl is currently working on this but it is not yet available. We will provide the drawing in due course, but as discussed in our meeting it will not provide any new information but will simply summarise the contents of the landscape and ecology management plan that you already have.

(b) the ecology mitigation strategy and landscape and ecology management plan to be combined as one document

This will be issued to you as soon as possible.

(c) bat survey of any significant trees (not ornamental) to be felled

I discussed this matter with our ecologists and they suggest it might not be a helpful exercise at this point in time. Bats tend to vary their roosts and as such the surveys need to be carried out close to when the trees in question will be felled. Clearly we do not yet know when this will be.

We have no objection to carrying out such a survey but suggest it would be better completed as a condition to be dealt with before development commences.

We have already provided a draft mitigation strategy that deals with bat mitigation on the site. It covers mitigation for bats found in trees on the site. Therefore we consider a planning condition would be the best way of dealing with this matter.

(d) combination of 'trees to be felled' and 'tree grading' drawings on one drawing

Please find this drawing enclosed.

### **3. Section 106 agreement**

(a) Parish Council

I understand the Parish Council have sought:

(i) £120,000 for improvements to village hall and £30,000 contribution to the pavilion on the recreational grounds

We are quite prepared to make a contribution to the Parish Council to reflect the likely relationship between the Care Community and the village. However, we do not feel that the amounts sought are reasonably related in scale and kind to the proposed development.

The Care Community is primarily a self sufficient and self sustaining operation. As we have previously discussed, residents are provided with 'hotel' style accommodation and facilities. A residents association will be developed and purpose built space will be provided for meetings or similar events.

Many residents within the Care Community will be residents in a care bed. They will not really be able to leave the Care Community at all regularly. Clearly these residents will not be using Parish Council facilities.

It is hoped and intended that the Care Community residents association will form strong links with the Parish Council. However, the Care Community has its own facilities and will not cause overuse of Parish Council facilities and resources. In fact the opposite may be true – the Parish Council will be invited to use Care Community facilities if they can meet a particular need.

I note that the requests by the Parish Council are similar to those requested as part of the 44 dwelling application. I do not know the basis on which the £120,000 and £30,000 contributions were calculated. We are prepared to accept that there may be some additional demand on Parish Council facilities but, given the nature of the Care Community and its facilities, this use will in no way be comparable to the use generated by 44 dwellings.

On this basis, we would therefore suggest that contributions of £60,000 to the Village Hall and £15,000 to the pavilion would be fairly related to the proposed Care Community development.



(ii) Land suitable to accommodate 25 graves

With regard to the extension to the burial ground, we had hoped to help the Parish Council purchase the land adjacent to the existing cemetery but I understand that following the death of the landowner, this would be impossible to be achieve in the timescale for the section 106 agreement.

I do doubt whether the Care Community will cause any additional demand for burial space in Letcombe Regis. The reality is that people will only wish to be buried in Letcombe Regis if they have a long association with the village. Such an association will have existed regardless of whether the Care Community proposal goes ahead. Nevertheless, we are prepared to make a modest contribution to providing further land for burial ground in the village and we suggest a financial contribution of £5,000.

(iii) Replacement tennis court on the recreation ground

We do not propose to replace the tennis court that exists on the site. This tennis court was only used with the permission of Dow AgroSciences and is not a designated or protected feature.

(b) County Council:

(i) £40,000 to local transport network

It is not intended that Care Community residents or staff will use the local transport as the Care Community will be providing its own minibus and bespoke transport service. Therefore we do not believe that the requested contribution to the local transport network is warranted.

However, we do accept that staff and residents should have a choice of means of transport and therefore public transport should be an option available to them. Therefore we agree that some contribution to the local transport network may be appropriate.

Again, I do not know the basis upon which the requested contribution was calculated and was not able to speak to Tim Foxhall to clarify this. To reflect the fact that most residents are expected to use the minibus and bespoke service that the Care Community will provide, we suggest that a smaller contribution of £20,000 is more appropriate.

(ii) £19,006 contribution to library services

With regard to libraries, we acknowledge that Care Community residents may well wish to use the County Council's library services. To this extent we are happy to make a contribution of £4,980 towards core book stock.

However, the mobile library already visits Letcombe Regis village. Therefore we do not understand why £14,026 should be payable for 'infrastructure.' We would be prepared to offer the County Council space within our development for use in conjunction with library services (indeed it is currently proposed to run a book club or similar from within the Care Community). However, without an explanation of what the 'infrastructure' may constitute, we cannot accept that this contribution should be made.

(iii) £3,000 per year for Wantage Independent Advice Centre

I also note the requested contribution towards Wantage IAC.

As you will remember from your visit to Nantwich (and as detailed above) the Care Community will run a minibus and bespoke transport service on site. This is likely to constitute a minibus, a large people carrier and/or a private car, all of which would accommodate wheelchairs.

There would be a number of drivers based on site. Obviously, in the interests of sustainability and economies of scale, it is preferable to drive larger groups of people to communal destinations at set times (such as a



morning in Wantage). However, the vehicles and drivers also provide individual trips to medical appointments or other individual appointments as required.

The bespoke services is provided through the general service charge paid by residents who purchase or rent their accommodation.

Therefore residents will not need to use the IAC's services and we therefore cannot agree to make such a contribution.

(iv) £500 for admin/monitoring

Agreed.

(c) Letcombe Brook Officer: £2,500 for interpretation board and leaflet drop in village

Agreed. Whilst writing I would point out that as a result of discussions with Sally Wallington, we have already agreed to carry out the following works to Letcombe Brook (which will be provided through the clause in the section 106 agreement that requires the implementation of the landscape and management plan):

|   |         |          |
|---|---------|----------|
| Desilting of Brook  | £25,000 |          |
| Taking Brook off-line                                       | £35,000 |          |
| Provision of berms and aquatic planting to island and banks | £8,000  |          |
| Bank treatment and width reduction                          | £12,000 |          |
| Gravel base for new stream                                  | £4,000  |          |
| Fish pass   | £5,000  |          |
| plus 10% prof fees  | £8,900  |          |
| plus 10% contingency  | £9,790  |          |
| Subtotal  |         | £107,690 |

All costs are of course estimated at this stage.

These ecological enhancement works are also additional to the commitment to transfer the Nature Reserve to BBOWT, with a sum of £200,000 for maintenance.

I attach a new draft of the section 106 agreement – the amendments made since the last copy we gave you are underlined. We have not yet inputted the values as they are clearly still under discussion.

**4. Other points**

In response to the other points you raised, I can confirm that:

- the bowling green will not be watered using water from the lake;
- we do intend to implement a sustainable drainage system as detailed in the Flood Risk Assessment; and
- we will retain the bricks and walls around the tennis court (although I note that consent exists for their demolition).

I trust this is all in order and you will be able to make a positive recommendation to your Committee on 3<sup>rd</sup> July.

Yours sincerely

A handwritten signature in black ink that reads "Neil Rowley". The signature is written in a cursive style with a large, sweeping initial "N".

Neil Rowley  
**Associate**

cc: S. Turnbull – Urban Evolution  
M. Habermehl – Adams Habermehl  
C. Harwood – BHP Harwood  
K. Cockell – Richmond Care Villages  
Alan Pope, Oxfordshire County Council