



THAME

Town Council

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Graham Hunt, Town Clerk & RFO

Ref: GM/AO

Mella McMahon
Major Applications Officer
South Oxfordshire and South Vale of White Horse DC
135 Eastern Avenue, Milton Park
Milton
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OX14 4SB

22 September 2016

Dear Ms McMahon

Planning Application Reference: P16/S2407/FUL

The erection of an Extra Care housing development (Use Class C2) comprising apartments, houses and communal residents' centre with basement parking and storage areas and creation of a new public open space, provision of new vehicle access from Elms Road and a new pedestrian/cycle link onto Upper High Street with associated infrastructure works and landscaping

The following comments regarding the above application were expressed either by Members of Thame Town Council or by concerned members of the public. The views were discussed at Full Council 20 September 2016 and are fully supported by Thame Town Council.

Fundamentally the application does not conform to the Thame Neighbourhood Plan (TNP), the most recently adopted planning document of relevance.

Thame Town Council believes that the traffic generated will exceed that of the original, permitted scheme (P14/S2167/FUL). It is possible that peak time traffic levels might be lower than those of the approved scheme but concern remains that overall, traffic will increase above those levels. With the suggested proposal for basement parking and the subsequent need to remove vast quantities of sub-soil new concerns have been raised regarding differing traffic levels and types of construction vehicle.

It is recognised the cycle paths indicated in the current scheme are identical in materials to those in the original (P14/S2167/FUL). It has been subsequently noted however that the gravel and cobble surfaces are unlikely to be appropriate or comfortable for bicycle use; a concern has been raised that cyclists will instead use the adjacent grassed areas, giving rise to issues over both safety and onward maintenance.

Concern has been expressed over the red line distance chosen for the applicant's Extra Care Housing Needs Assessment. There is feeling that the 6.5 mile radius chosen is largely arbitrary and does not reflect the gravity Thame has in attracting regular visitors as suggested by both the Thame Vibrancy and Vitality Study, 2016 and the Thame Retail Capacity and Impact Study, November 2015. It is therefore uncertain what percentage of occupants would be local to the Thame area. A local occupier condition would help ensure any benefit from

freed-up housing remains in the local area, important considering the potential loss of a housing allocation site. This might also help mitigate another main concern expressed by both Members and the public, namely, the impact new households would have on already stretched local health services.

Concern was expressed over detailed design; practically blank elevations on the North Block, and the communal building do not provide the quality of development expected within the Thame Conservation Area.

Concern was raised over the design of the residential blocks. It has been suggested that in some cases the national standards for living space or bedroom size by type are at risk of not being met. This was seen as part of the compromise of trying to fit an inappropriate scheme into the footprint and curtilage of the very different, earlier scheme.

There is no affordable housing proposed, contrary to policy H8 of the Thame Neighbourhood Plan (TNP).

Similarly, the proposed development does not provide a Thame-specific mix of affordable housing, contrary to Policy H10 of the TNP.

No extra benefit to Thame exists from this scheme, over the original scheme approved (P14/S2167/FUL).

National and district planning concerns are overriding the correct interpretation of allocation site policy HA4. It is agreed that the serious issue of the lack of a 5-year housing supply affects relevant housing policies. However the sound design principles developed in recognition of heritage and conservation concerns were overlooked in the original scheme and this oversight is being continued by the applicant through the new proposal. The following elements from policy HA4 are still relevant to the application and should be fully re-considered for this particular application:

- The built development proposed is now wholly commercial in nature, being private residential care housing in use class C2. The attached communal centre, containing a restaurant, bar and health facilities is also commercial in nature, serving only the fee-paying residents and “qualifying” members of the public. It is expected the latter will have to join on a private membership basis. This goes entirely against the principle of the original allocation of site HA4 which was for residential development, including affordable housing and public open space;
- The housing upper limit of 45 in HA4 was not primarily set to control the allocation of dwellings on the site for the purpose of meeting the objectively assessed need for housing. The limit was mainly adopted in order to address heritage concerns such as those raised by English Heritage (now Historic England) as it reacted to the contemporary landowner’s own heritage assessment. The limit was expressed in policy in order to guide applicants towards development deemed appropriate, given the constraints of the site. It was intended to act as a means of increasing the likelihood of a successful application. It was recognised though that the number suggested might be too high to achieve the fine balance required when considering housing and public open space need against the unique heritage constraints of the site. A process of identifying an alternative allocation site for any dwelling provision not met on the site was therefore made. Without it, policy HA4 would not have been judged sound;
- This upper limit was subsequently tested through the original application (P14/S2167/FUL) and found to be too great for the site’s sensitivities. The scheme originally proposed the maximum 45 dwellings in line with Policy HA4 but approval was instead given for 37 dwellings. It is worth emphasising that the reduction in dwelling

numbers occurred through the development management process, triggered by heritage, design and conservation concerns, rather than because of any constraint applied through housing needs policy. For this reason alone the current proposal for 87 dwellings should be refused;

- For similar reasons the supporting text to HA4 directs development to the east and south-eastern area of the site. This sensitivity, solely based on the need to preserve the historic landscape and setting of the listed Elms was not given adequate recognition in the original application and has again been ignored in the current proposal. The case officer for the original scheme noted this area was not defined within HA4's boundary and therefore chose to overlook this important principle. A prescriptive boundary would, however, have been inappropriate on this sensitive site in the absence of a full design brief or master plan;
- Concern remains about the height of the residential buildings, all 3 storey, and now made higher than application P14/S2167/FUL by the addition of lift shafts. This is contrary to a key design principle set in Policy HA4 in order to safeguard the whole site and the setting of the Elms listed building and wider conservation area from harm.

Given all the above concerns Thame Town Council strongly recommend application P16/S2407/FUL is refused.

If the application is permitted then it is critical the agreed S106 for P14/S2167/FUL is at the very least carried forward. At the meeting of Thame Town Council on 20 September 2016 the applicant confirmed they would voluntarily do this. Given the proposed intensification of the site it would be preferable if relevant contributions were uplifted to reflect the increased level of mitigation required.

Yours sincerely



Graeme Markland
Neighbourhood Plan Continuity Officer