



**THAME**  
Town Council

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Graham Hunt, Town Clerk & RFO

Ref: GM/GH

Adrian Duffield  
Head of Planning  
SODC 135 Milton Park  
Milton  
Abingdon  
OX14 4SB

25/10/2016

Dear Mr. Duffield

**Pre-application advice request: Land West of Thame Park Road, Thame**

Thame Town Council understand that Persimmon Homes have submitted a pre-application request regarding the above site to SODC's Development Management Team. Craige Burden, Planning Manager at Persimmon informed us of the application and sent us some documentation; I note that what he has sent us does not accord with what is listed in the application.

Persimmon are looking to intensify the site that was originally granted permission for 175 dwellings under P13/S2330/O in line with the Thame Neighbourhood Plan and the SODC Core Strategy. The outline application as originally granted met the required criteria in terms of housing mix, density and built form.

The principle of the site established through Policy H1 and HA3 of the Thame Neighbourhood Plan (TNP) has been confirmed not just by consultation and the ensuing examination in public but also by a referendum, with significant support (76%) gained from across the local community. The policies within the neighbourhood plan evolved to help steer development to make it acceptable to the people of Thame; there is now a clear, shared expectation of how this site will develop to become part of the townscape. Were the vision and expectations of the community overridden a clear message would be sent back to them that their efforts were without merit. It would suggest that strategic planning is something that happens to the people of the community, rather than develop from and through them. The developer will be seen to be holding all the aces.

The new proposal is contrary to TNP Policy ESDQ18 (new development must contribute to local character by creating a sense of place appropriate to its location). The development as originally outlined showed sensitivity in varying density across the site, with the least dense housing forming a soft edge to the adjoining public open space and countryside. This approach was well-suited to this site, and in compliance with Policy CSEN1 of the adopted SODC Core Strategy. This design principle has been abandoned in the current proposal; net density is up 75%, from 33.5 dwellings per hectare (dph) to 57.3 dph. The net density proposed accords more with an inner city area of Victorian terracing than a soft urban edge. The principle established through Policies ESDQ22 and HA3 to minimise the visual impact of development when viewed from the countryside has similarly been ignored, as has the principle of opening views into the countryside detailed in Policy ESDQ21.

In failing to integrate successfully into the surrounding and natural environment, and in cramming development rather than providing good design the proposal is similarly contrary to paragraphs 58, 61 and 65 of the National Planning Policy Framework (NPPF). In proposing development that does not acknowledge the location of the site it fails the core planning principle detailed in paragraph 17 of the NPPF in not recognising the role and character of the urban edge, and also fails to recognise the role of the adjacent open space and agricultural land. It similarly chooses to ignore the intrinsic character and beauty of the countryside.

In requesting the pre-application meeting with SODC Persimmon are of course testing the reaction of SODC as the LPA, and to a lesser extent, TTC. All other allocation sites within Thame, including Persimmon's own adjoining site to the east have been or are being built in accordance with the policies of the TNP. At 27 September Neighbourhood Plan Continuity Committee, the initial request from Turley for a screening opinion was reported to Members of TTC. Although noted as an item for no immediate action, a unanimous opinion was given that any subsequent application would be resisted as being contrary to the housing and design policies of the Thame Neighbourhood Plan. There are no benefits in eroding the design ethos behind the site which benefits from the clear design steer contained within the TNP (HA3).

Any Development Plan Document will be subject to attack and it is all our interests to extend their lifespans to ensure the longest possible period of stability. This enables the vision and objectives of each plan to be realised. The proposal from Persimmon is less an attempt at intensification, and more of a coup, in attempting to seize planning control from the District. We will help you resist such attacks in any way we can, regardless of their location.

It is public knowledge that Persimmon have granted a £600 million bonus to their top 150 managers (reported widely, June 2016). Since their bonus scheme was set up over £1 billion pounds has been returned to shareholders. They have continued to sink vast sums – reportedly £2 billion - into new land purchases. Following the signing of the relevant Section 106 in June 2014, Land Registry figures indicate the average house price has risen by £66,000 across the south east. Persimmon are not a struggling company; the allocation site they actively sought to develop in Thame has not turned out to be heavily contaminated, archaeologically sensitive or in other ways difficult to bring forward. This is simply a race towards obscene profit and the lowest common denominator. Both will be at the cost of the community of Thame and planned, sustainable development.

It is recognised that the District cannot demonstrate a 5-year housing land supply. Any argument towards permitting or encouraging this development would however be flawed. The TNP is in compliance with the NPPF, and this includes the 12 core planning principles outlined in paragraph 17. It is, for example plan-led, it seeks a high quality of design and amenity for current and future residents and it takes full account in recognising the roles and character of the different areas of Thame. The design principles within the TNP guide the developer towards what has been found to be sound, sustainable development for this adopted allocation site. Persimmon's proposal would not only be contrary to the vision, objectives and key policies of the TNP but would also be contrary to principles established within the NPPF. Persimmon should be advised against submitting any similar proposal as a planning application.

It is the belief of TTC that councils, including SODC have not been taking sufficient notice of paragraph 198 of the NPPF. Paula Scott has recently passed a guidance note containing planning appeals to Thame Town Council with cases where policy 198 had not been favourably considered; we note however that the cases relate almost solely to neighbourhood plans in preparation, or quashed, which would carry relatively little material weight. We will be in contact with you again on this matter.

In the meantime, we trust that SODC in any pre-application discussion will insist on continued compliance with the adopted policies of the Neighbourhood Plan and simply state to Persimmon that their proposal is without merit.

Yours sincerely

**Graeme Markland**  
**Neighbourhood Plan Continuity Officer**

c.c. Paula Fox, Head of Development Management