



4 Arnold Way Thame Oxon OX9 2QA

t: 01844 214631 m: 07753 502955

email: jake@jcpc.org.uk

APPLICATION BY STOFORD THAME (GROVES) LTD,
STOFORD THAME (WINDLES) LTD AND DJ AND RT
WHITE FOR FULL PLANNING PERMISSION FOR THE
ERECTIO OF TWO INDUSTRIAL UNITS (CLASS B1/B2/B8)
AND FORMATION OF TWO NEW ACCESSES, CAR
PARKING, LANDSCAPE PLANTING, FORMATION OF
LANDSCAPE BUND AND ASSOCIATED INFRASTRUCTURE
INCLUDING DRAINAGE FEATURES ON LAND AT
COTMORE WELLS FARM, TOWERSEY ROAD, THAME,
OXON.

REPORT TO THAME TOWN COUNCIL

JUNE 2014

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1.0 Purpose of the Report

1.1 This Report has been prepared to assist Thame Town Councillors in their consideration of the application (P14/S1347/FUL) submitted by Stoford Thame (Groves) Ltd, Stoford Thame (Windles) Ltd and DJ and RT White for planning permission for:

'The erection of two industrial units (Class B1/B2/B8) and formation of two new accesses, car parking, landscape planting, formation of a landscape bund and associated infrastructure including drainage features'

on land at Cotmore Wells Farm, Towersey Road, Thame.

1.2 The Report is not intended to provide any specific recommendations, rather the purpose is to consolidate and provide commentary on the information submitted with the application and the issues that arise therefrom, identifying issues that Councillors may wish to consider when assessing the application. However, given that Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets a statutory obligation for the Local Planning Authority to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise, reference is necessarily made to the relationship of the proposals with Development Plan policy, and other material considerations.

1.3 Accordingly, the Report is structured as follows:

- The Site and Surrounding Area
- The Proposals
- Policy Context (summary)
- Key Planning Considerations

2.0 The Site and Surrounding Area

- 2.1 The site is located on the eastern side of Howland Road, directly to the north of the Phoenix Trail and opposite the DAF site. The site, as denoted by the red-edge contained in the application documentation, extends to an area of approximately 6.9 hectares. The western section of the site (up to Howland Road) comprises open pasture land with a range of mainly utilitarian farm buildings located in the central section of the site, set back some 100m from Howland Road. This section of the site is generally level before falling away to the east.
- 2.2 The phoenix trail extends along the southern boundary of the site, to the south of which are a range of commercial buildings and uses. To the north and east, the site directly adjoins open countryside with, to the west (on the opposite side of Howland Road) two-storey office and warehouse buildings with associated parking, predominantly occupied by DAF. Pickenfield is located directly to the north of the DAF site, a residential development comprising mainly detached two and three-storey dwellings.
- 2.3 For planning policy purposes the Thame Neighbourhood Plan allocates part of the site, amounting to 3 hectares, for employment use - comprising either B1, B2 or B8 uses.

3.0 The Proposal

- 3.1 As noted in the description of the development, the proposal seeks planning permission for the construction of two industrial units (Class B1/B2/B8) and ancillary works that, it is intended, would be occupied by two local businesses, Windles and Groves, both of whom are currently located in Long Crendon, and for whose occupation the buildings have been specifically designed:

Windles:

The Windles Group is a family-run business providing a specialist printing service, principally in relation to greeting cards and printing on plastics. The company has grown from 30 employees in 2000, to 70 at the present time, and currently occupies four units in Long Crendon with leases due to expire, and has been actively seeking a new, single unit of accommodation in the local area.

Groves

Groves is also a family-run business, founded in Thame in 1966, and is one of the leading distributors of haberdashery. The business currently operates from premises in Long Crendon that have grown organically but with a doubling of turnover of the last four years, the company wish to double their current floorspace whilst also allowing for future business expansion. Groves currently employ 100 staff, the majority of whom reside in Thame, Haddenham or Aylesbury, and with expansion aim to employ 150 staff in the next five years. Due to the specialist nature of the work, the company require to maintain a close-correlation between the location of the business and their workforce.

- 3.2 As shown on the site layout plan, the proposed buildings would extend through the site on an east-west axis with the larger unit (Building 1: Groves), extending to approximately 9,500sqm and located on the southern section of the site, with the smaller unit (Building 2: Windles) to the north thereof, and extending to 4,500sqm.

- 3.3 The larger unit (Building 1) would be set back, on average, 50.0m from the western boundary of the site with Howland Road, with a 70.0m wide frontage to the road and depth of 130.0m. The building, which would provide offices over two-floors at the western end with the remainder an open warehouse, would have an eaves height of approximately 11.0m and ridge height of 13.0m. The building would be finished with profiled cladding with sheet roofing.
- 3.4 Parking for Building 1 would be provided to the front (west) of the site, delivering approximately 110 spaces, together with a separate cycle store, all accessed via a new entrance off Howland Road in the southern section of the site. A circa 15.0m wide deep landscape strip, which would be mounded in places, would be provided between the parking spaces and Howland Road and which would accommodate a 3.0m wide footpath and cycle path. The area to the south of the building, and extending towards the southern boundary of the site, would be a 35.0m deep service yard for the full length of the building.
- 3.5 The smaller unit (Building 2) would be located to the north of Building 1, separated therefrom by a gap of approximately 12.5m. The building, which would be accessed via a new entrance off Howland Road in the northern section of the site, would be positioned marginally closer to the western site boundary than Building 1, with a width of 41.0m and depth of approximately 97.0m. The building would contain a two-storey office element to the front (west) with the remainder an open warehouse. The building would be of a simple, rectangular plan form with 9.0m high eaves and a single ridge line, extending east-west through the site, and to a height of approximately 11.5m. The building would be finished with profiled cladding with roof sheeting.
- 3.6 Parking would be contained to the front (west) and side (north) of the building, providing approximately 82 parking spaces, with a similar landscaped area to the front (west) up to Howland Road. A service yard would be contained to the side (north) and rear (east) of the building.

- 3.7 A landscaped, mounded buffer, some 17.0m deep would be provided to the north of Building 1 and the associated service yard and continue to a similar depth to the east of the building. The existing access track to Cotmore Wells Farm, which extends off Towersey Road to the north of the site, would then be realigned to the north and east of the mounded section to serve the retained farmhouse.
- 3.8 A drainage pond is proposed to the east of Building 1, which would provide attenuation of surface water run-off, before discharging in to the stream on the eastern boundary of the site.

4.0 Planning Policy Context

4.1 The principal planning policy context is set by the following:

- Development Plan:
 - Saved policies of the South Oxfordshire Local Plan 2011 (SOLP)
 - South Oxfordshire Core Strategy (2012) (SOCS)
 - Thame Neighbourhood Plan (2013) (TNP)

- Supplementary Planning Documents
 - South Oxfordshire Design Guide

- National Planning Policy Framework
- Planning Practice Guidance

4.2 The above list is not intended to be exhaustive, nor is it proposed to review relevant policies as part of this Report. However, where appropriate, cross-referencing to such policy documents will be incorporated in to the commentary at Section 5.0

5.0 Key Planning Considerations

5.1 This Section of the Report highlights the key planning issues connected with the proposals, providing commentary on each with reference to relevant Planning Policy and the information submitted with the application. The key issues are identified as:

- Principle of the Development
- Design and Landscape Impact
- Impact on Existing Trees
- Transport and Parking
- Flood Risk and Drainage
- Ecology
- Heritage Considerations
- Noise Impact
- Air Quality
- Environmental Site Assessment
- Sustainability and Energy Strategy

5.2 These issues are considered in turn below.

Principle of the Development

5.3 Policy CSEM2 (The amount and distribution of employment) of the adopted Core Strategy outlines the need, across the plan period, to facilitate the growth of approximately 5000sqm of B-Class jobs across South Oxfordshire in the period to 2027. This equate to some 20 hectares of additional employment land, of which 6.5 hectares are to be provided in Didcot with the remainder, some 13.5 hectares, spread across the District. The policy goes on to states that '*about 2 hectares of further employment land [should be provided] at Thame*'. This requirement is reinforced through Policy CSTHA1 (The Strategy for Thame) of the Core Strategy with paragraph 11.13 noting that '*Our [the District Council's] strategy seeks to improve the existing*

employment stock and also to provide a new employment site or sites totalling about 2 hectares to encourage more people to work locally'.

- 5.4 The TNP translates the employment requirements of the Core Strategy to the local level through Policy WS11. As noted in the pre-amble to Policy WS11, the TNP allocates 3 hectares of land on Site B for employment purpose, higher than the Core Strategy requirement, but reflective of the fact that the TNP allocated a former employment site (Memec and extending to circa 0.5 hectares) for residential use.
- 5.5 Policy WS11 thus states that *'Permission will be granted for 3 hectares of land for employment on Site B as shown in Figure 8.5'*. For clarity, Figure 8.5 is reproduced below.



Figure 1: Extract of Figure 8.5 of the TNP.

- 5.6 As shown therein, the allocation relates to an 'L-shaped' parcel of land comprising generally the land to the west of Cotmore Wells Farm (up to the boundary with Howland Road) and to the south thereof (up to the Phoenix Trail) and amounting to approximately 3.0 hectares.

5.7 Figure 8.6 of TNP then sets a series of requirements for the development of the site for employment purposes, including:

- that vehicular access must be provided from the ring road;
- that a pedestrian/cycle link must be provided to the Phoenix Trail on the site's southern boundary;
- that improvements must be made to the pedestrian/cycle links around the eastern portion of the ring road;
- that these links must be overlooked by buildings and well lit so that users feel secure; and
- that positive building frontages must overlook the site access.

5.8 A copy of Figure 8.6 of the TNP is set out below.

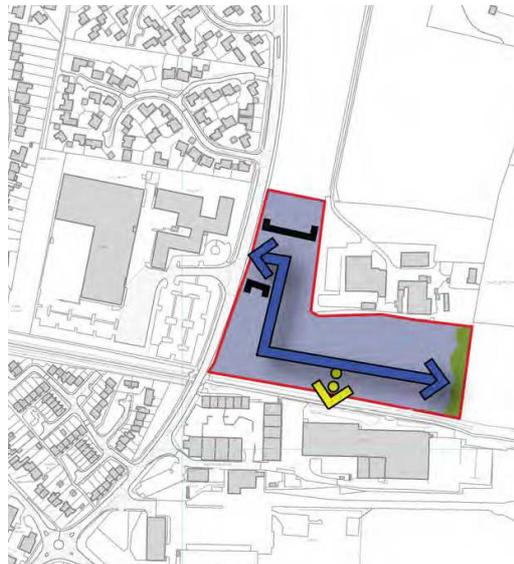


Figure 2: An extract of Figure 8.6 of the TNP

5.9 The application site, as noted in red on the site plan, extends to an area of approximately 6.9 hectares, of which approximately 2.3 hectares is 'consumed' by drainage infrastructure and ecological mitigation. The remaining 4.6 hectares (the developable area) would contain buildings, parking, servicing areas and landscaping.

5.10 Although the developable area of the proposed scheme includes the land allocated through Policy WS11 of the TNP (save for the eastern extent of the policy allocation that is to be drainage infrastructure), the extent of such land exceeds the allocation in the TNP by approximately 1.6 hectares. As a consequence, the proposals, by virtue of the inclusion of land outside the allocated area, would be contrary to the requirements of Policy WS11 of the TNP such that it is necessary, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act, to consider whether there are any other material considerations that outweigh the harm by reason of the policy conflict.

5.11 In this regard, a number of considerations are put forward by the applicant including:

- i. That the additional land proposed for employment development (by comparison with the allocation in the TNP) is solely a product of the spatial and floorspace requirements of the two proposed occupiers, Windles and Groves, who currently provide employment in the local area (at Long Crendon) and who wish to commit to long term investment in Thame and for whom the proposed, bespoke accommodation, would meet their short, medium and long term requirements;
- ii. That the development would maintain existing employment in the local area and facilitate, over the next five years, the creation of 80 additional jobs between the two businesses (an increase across the businesses of 47%) with an anticipated 250 jobs at the end of the five years.
- iii. That such development would have secondary economic benefits for Thame, including through additional local expenditure and business rates, that would collectively support and facilitate other businesses in the town.
- iv. That retaining and creating jobs in the town would contribute to reducing the currently high levels of out-commuting for work-based activities.

- v. That a new pedestrian and cycleway link would be provided along the site frontage, link the two new employment units with the Phoenix Trail and providing access to the town centre.
 - vi. That a new bus stop would be provided on Howland Road, adjacent to Unit 1, to link with existing services and that would provide improved public transport accessibility to the site.
 - vii. That an ecological mitigation and enhancement strategy would be implemented to ensure the creation and retention of biodiversity interest on the site and related habitats.
 - viii. The provision of a comprehensive landscaping scheme to soften the visual impact of the proposed development.
 - ix. The creation of a sustainable employment development, aiming towards a BREEAM 'Very Good' rating and the use of sustainable urban drainage techniques.
- 5.12 Whilst acknowledging that each of the above represent benefits of the proposed development, a number are prerequisites of existing policy in any event and, in these terms, should not of themselves be given significant weight in balancing whether the considerations are sufficient to outweigh the conflict with policy. To that extent, therefore, Councillors should focus on items (i), (ii), (iii), (iv) and (vi) noted above and consider whether these, either individually or in combination, are sufficient to outweigh the conflict with Policy whilst having regard to the matters set out in the remainder of the Report, particularly with reference to design and landscape impact.
- 5.13 In the event that Councillors determine that these factors do outweigh the conflict with Policy, consideration should be given to ensuring mechanisms are in place to control the delivery and occupation of the units to the two named businesses.

Design and Landscape Impact

- 5.14 In landscape terms it should be recognised, at the outset, that the allocation in the TNP accepts that there will be changes to the landscape character of the site and its surroundings - albeit that the landscape qualities of this area are already heavily influenced by the commercial development to the south and west of the site, the residential development to the north-west and south-west and the farm buildings at Cotmore Wells Farm. Indeed, whilst the extent of the developable area proposed in the application exceeds the allocation in the TNP, the allocation in the TNP related to an 'L-shaped' section of land with the farm buildings beyond (that have an influence on the landscape as noted) retained. Given that the proposals involve the demolition of the farm buildings and their replacement with the proposed units it follows that, in reality, the extent of built development (in terms of the overall developed area) on the site would potentially not be substantively different from a development of the allocated site with the farm buildings retained, especially when long distance views of the site are considered in conjunction with the more limited scope for soft landscaping that rigid adherence to the allocated site would allow.
- 5.15 Nevertheless, what the larger site (both in terms of its size and shape) does facilitate is the prospect of a more substantive warehouse/'shed' style development that the configuration of the allocated site would not so readily accommodate, or at least not on the scale that is now proposed. Indeed, the proposed buildings would be of a substantial scale, with the footprint of Building 1 marginally larger than (for comparative purposes) the principal Kubota building on Dormer Road and with Building 2 broadly comparable in size to the Kubota building. Furthermore, and again for comparative purposes only, Building 1 would have a height of 13.0m (with eaves of 11.0m) and Building 2 a height of 11.5m (with eaves of 9.0m), which would compare with the existing Lucy Building, at 11.5m (max) high, the modern units fronting Howland Road to the south of the site at 9.2m height, the DAF building (10.2m high) and the residential development at Pickenfield, that is typically 9.2m high.

- 5.16 Thus it is evident that the proposed buildings would be of a substantial scale, mass and bulk, even in the context of the commercial buildings that surround the site. Whilst that is not to say that the landscape impact would necessarily be harmful (especially given that the existing landscape quality is somewhat denuded by existing development), it should be recognised that no level of landscaping along the periphery of the site will ever fully hide or screen the buildings.
- 5.17 In assessing such impact, the application includes a Landscape and Visual Impact Assessment (LVIA) that considers the effect of the proposed development on the wider and localised landscape. In terms of the former, the LVIA concludes that in long distance views (and with the landscaping proposed) the proposals would have a limited impact on existing receptors (eg. in views from Towersey and from the Phoenix Trail).
- 5.18 The impacts on the localised landscape and, especially, views from Howland Road and the immediate environs (especially approaches from the north) would be more pronounced. Whilst, as noted, change to the landscape and views from these receptors is an inevitability given the allocation of the site in the TNP, what is not as evident is how meaningful the proposed landscaping will be in terms of mitigating the visual effects of the development. This, it is recognised is a specialist area, but in the event that Councillors accept the principle of the proposed development, it would be prudent to request involvement with the District Council's Landscape Officer to ensure that the depth and form of soft landscaping around the periphery of the site achieves an appropriate level of visual mitigation or, if not, to secure amendments in connection with the same.
- 5.19 In terms of design, the form of the buildings are a function of their purpose and, to that extent, the buildings are as you would anticipate for a warehouse-based development. Subject to the landscape matters outlined above, and controls over external materials, no objections are raised to the design of the proposed buildings, and the layout of the development in terms of the disposition of car parking and service yard areas.

Impact on Existing Trees

- 5.20 A tree report and associated impact assessment and method statement accompanies the application. This reviews all trees on the site, categorises each tree in accordance with the relevant British Standard, identifies which trees are to be removed and protection measures for those to be retained.
- 5.21 As detailed in the report, the majority of the trees/hedgerows in the central section of the site would be removed to accommodate the development. With the exception of two 'B' Category trees, an Ash tree located in the position of the building footprint, and a Willow tree located in the position of the re-aligned watercourse, the majority of the specimens to be removed are 'C' and 'U' category trees that, by definition, have a low amenity value. Given such, it is not considered that the removal of the existing trees (especially given the matters set out in respect of proposed landscaping) would have any material consequences for the character and visual amenities of the area.
- 5.22 The trees to be retained are mainly located on the southern boundary of the site (with the Phoenix Trail) and to the east of the development site (in the location of the balancing pond and associated watercourse). Subject to appropriate measures to secure their protection and retention (matters that could be controlled by planning condition), the proposals are thus considered to be acceptable in these respects.

Transport and Parking

- 5.23 The application is accompanied by a detailed Transport Assessment that analyses likely trip generation arising from the proposed development in the context of the existing working patterns of the two proposed occupiers. This indicates that the overall impact on traffic movements in the locality would be less than 7%, with the existing junctions capable of accommodating the increase in traffic without significant queuing at these junctions.

- 5.24 Nevertheless, it should be noted that the modelling undertaken does not include the cumulative effects of such with either the development allocated in the TNP on Site C and D, nor the effects of the re-prioritisation of Thame Park Road and Wenman Road on vehicle movements along Howland Road. It would be sensible to model and consider the effects of such to ensure the cumulative impacts do not give rise to significant harm.
- 5.25 Levels of parking provision on the site would be broadly in accordance with the standards in the adopted SOLP and, indeed, is shown in the Assessment to be sufficient to meet the needs of the businesses given staff and visitor numbers and working patterns.
- 5.26 In addition, measures are proposed in the material submitted with the application to secure the use of more sustainable modes of transport. In particular, draft Travel Plan frameworks are submitted for each Company illustrating the measures and mechanisms to be used to facilitate the use of more sustainable travel modes - frameworks that could be controlled by planning condition. Alongside this, a new bus stop is proposed on Howland Road that would be served by Service 40, with the site also located adjacent to the Phoenix Trail and, therefore, readily accessible by cycle.
- 5.27 Whilst these measures would, in part, contribute to securing a sustainable form of development, Policy GA3 of the TNP also requires developments to provide financial contributions towards the provision of a cycle/footpath link to Haddenham and Thame Parkway Rail Station. That being so, it is appropriate that such financial contributions should be secured from the proposed development.
- 5.28 Subject to such, it is considered that there are no access or parking constraints to the development and that the proposals would, subject to conditions in respect of the framework Travel Plans and a Legal Agreement securing contributions to the cycle/footpath link to Haddenham and Thame Parkway, provide for a sustainable form of development in transportation terms.

Flood Risk and Drainage

- 5.29 The Flood Risk Assessment (FRA) accompanying the application identifies that the site is located in Flood Zone 1 (i.e. outside an area at risk of flooding), albeit with shallow groundwater levels evident in places across the site, the report identifies that parts of the site are vulnerable to groundwater flooding. However, the Report concludes that there is no risk to the buildings (which would sit above this level) with the primary risks connected with such arising from ground water weeping from cutting faces and excavations.
- 5.30 Nevertheless, the proposed approach to dealing with surface water accords with principles of Sustainable Urban Drainage (SUDS), with the use of porous paved parking areas, and with all surface water otherwise channelled to, and held in, an attenuation pond located on the eastern section of the site before being discharged, through swales, to the existing watercourse bordering the eastern edge of the site. Such an approach ensures that the rate of discharge in to the watercourse would accord with existing, greenfield levels, whilst also taking account of climate change.
- 5.31 Foul water would be discharged, via a private pumping station, to an existing foul sewer in Pickenfield - the acceptability of such which will be subject to the normal statutory approvals and consents from the relevant authorities/bodies.
- 5.32 Therefore, although there are some minor anomalies between the matters contained in the FRA and the details of the proposals shown on the submitted plans (that should be reviewed and clarified) there are not considered to be any substantive drainage or flood risk issues connected with the proposed development.

Ecology

- 5.33 A Phase 1 Ecological Survey has been undertaken of the site, with extended surveys in respect of known ecological interests. This has revealed the presence of bats

- (Pipistrelle and Brown Long-Eared) in the existing nineteenth century barn on the site, with an active badger sett located within an embankment on the site.
- 5.34 The nineteenth century barn would be demolished as part of the development and, as a consequence of such, the creation of an off-site bat house is proposed by way of mitigation for the loss of bat habitat. A separate planning application has been submitted to the District Council for the creation of the bat house and is currently under consideration. Therefore, the acceptability of the proposals in ecological terms is thus contingent upon (i) a planning permission being in place for the bat house, (ii) an acceptance from the relevant professional interests that the bat house represents an appropriate form of mitigation, and (iii) a mechanism tying the delivering of the bat house to any planning permission on the site. Accordingly, in the event that Councillors recommend approval of the application it should be contingent on the acceptability of these measures.
- 5.35 Similarly, it is proposed that the existing badger sett would be replaced with a new sett located in the south-eastern corner of the site. The acceptability of such as a mitigation measure will be considered by relevant specialisms during the processing of the application and thus a recommendation to approve the application should also be contingent on these measures being acceptable.
- 5.36 Whilst no other protected species were identified on the site, the report recommends a number of mitigation and enhancement measures, including planting additional shrubs and hedgerows on the periphery of the site as a means of re-creating natural habitats and ensuring that tree removal takes place outside of the bird nesting season. These additional measures could be suitably referenced in an Ecological Management Plan and Mitigation Strategy, details of which could be controlled by planning condition.
- 5.37 Therefore, and subject to the caveats noted, there are not considered to be any substantive ecological constraints to the proposed development.

Heritage Considerations

- 5.38 Whilst there are no designated heritage assets on the site, the application is accompanied by a Heritage Statement. This indicates that whilst there is nothing of significance across the majority of the site, the southern extent has the potential to form part of an Iron Age and Roman Settlement/Cemetery. Although the evidence suggests this is contained mainly off-site (at BOC), the Report indicates that further investigation in respect of the potential for sub-surface remains in this area of the site is required. The Report suggests that this trial trenching is on-going, and that the results of such will be made available during the course of processing of the application. That being so, and whilst these matters are unlikely to be a constraint to development and could be controlled by planning condition, such additional evidence would usefully help to ascertain the significance of such heritage assets on the site.

Noise Impact

- 5.39 The application is accompanied by a noise report that considers the potential noise-related impacts of the proposed development, particularly with regard to the most sensitive local receptors (i.e. residential units). As set out in the Report, the basic methodology for such involves assessing existing ambient noise levels on the site (from locations broadly equivalent to that of the proposed buildings) - and from where the majority of existing noise is attributable to road traffic on Howland Road - then measuring noise levels from existing facilities occupied and used by the proposed occupiers, before modelling the effects of such at the site specific level.
- 5.40 The outputs of such process indicates that the anticipated noise levels at the nearest residential properties would be equivalent to the existing night-time noise level and would not, thus, have a harmful impact. However, the Report indicates that noise attenuation/mitigation measures will be required in respect of the Paper Silo to be used by Windles (and which can operate 24-hours a day) together with any proposed external mechanical plant on the buildings. In both respects, these matters could be controlled by planning condition.

- 5.41 In addition, the Report assumes that all deliveries to the site would be between 07:00 and 20:00, during which time the evidence indicates that no harmful noise impacts would arise. That being so, it is considered appropriate that a condition be imposed restricting deliveries outside the period noted above.
- 5.42 Accordingly, the evidence demonstrates that the likely noise impacts arising from the proposed uses would not (subject to conditions in respect of the matters noted) impact adversely on the amenities of existing residential occupiers.

Air Quality

- 5.43 Whilst there are currently no Air Quality Management Areas in Thame, the air quality impacts of the proposed development have been assessed at both the construction and operational phases of the development.
- 5.44 The assessment indicates that the proposals would meet all air quality objectives in respect of sensitive receptors at Pickenfield and Pearce Way, and would not have a significant long-term effect on such at the operational stage of the development. Nevertheless, the assessment suggests that, without mitigation, dust impacts during the construction phase could impact on these receptors. Accordingly, the assessment sets out a series of mitigation measures as part of a 'Dust Management Plan', and which could be controlled by condition. Subject to such approach being acceptable to the District Council's Environmental Health Officer, the proposals are considered acceptable in this respect.

Environmental Site Assessment

- 5.45 The Environmental Site Assessment indicates that there are unlikely to be any historic contamination issues connected with the development of the site given that the site has been in mainly agricultural use. Nevertheless, to confirm such, a series of trial pit and bore hole sampling has been undertaken on the site. The results of such indicate that

there is no evidence of ground contamination, with ground water and surface water sampling also confirming that there are no unacceptable risks in this regard. Accordingly, the report concludes that the site is very low risk in environmental terms, a position endorsed by the District Council's Contaminated Land Officer who has confirmed they have no objections to the proposal.

5.46 Nevertheless, the Assessment includes a range of measures that would assist and mitigate any impacts in these respects, including:

- The importation of top soil in landscape areas to provide an improved rooting medium for plants;
- Where materials are to be imported, to utilise inert materials; and
- Incorporation of infiltration techniques based on Sustainable Urban Drainage techniques.

5.47 In combination, the evidence indicates that there are no site-specific environmental constraints to the proposed development.

Sustainability and Energy Strategy

5.48 In the context of policies in the Core Strategy that require proposals for commercial buildings of this scale to achieve a BREEAM rating of 'Excellent', the application is accompanied by a Sustainability and Energy Strategy. The strategy has three 'strands':

- (i) Reducing Carbon Dioxide emissions through Passive Design;
- (ii) Reducing Carbon Dioxide emissions through energy efficiency measures; and
- (iii) Reducing Carbon Dioxide emissions through the use of renewable or low/zero carbon technologies.

5.49 In respect of each of these matters the following are proposed:

- (i) Passive Design:

- Reducing air permeability;
- Maximisation of thermal properties through material selections;
- Use of high specification low emissivity glazing; and
- Inclusion of rooflights to reduce reliance on artificial lighting.

(ii) Energy Efficiency Measures:

- Lighting Controls;
- PIR's;
- High specification energy efficient plant; and
- High efficiency lighting.

(iii) Renewable and Low/Zero Carbon technologies:

- Use of Air Source Heat pumps to offices.

5.50 The details contained in the Strategy suggest that the above measures would achieve a BREEAM rating of 'Very Good', one 'step' below a rating of 'Excellent'. Whilst the Strategy indicates that achieving a rating of 'Excellent' would place a *'heavy financial and technical burden on schemes affecting project viability'* there is little evidence to support such an all-embracing statement in this particular case. In the absence of evidence to this effect, it would be difficult to justify acceptance of a 'Very Good' rating contrary to Policy CSQ2 of the Core Strategy. That being so, the matter should be referred back to the applicant to justify and evidence how and why achievement of an 'Excellent' rating would affect project viability.

6.0 Concluding Remarks

- 6.1 This Report reviews and summarises the information submitted by the applicant in respect of an application by Stoford Thame (Groves) Ltd, Stoford Thame (Windles) Ltd and DJ and RT White in respect of an application for the erection of two industrial units (Class B1/B2/B8) and formation of two new accesses, car parking, landscape planting, formation of a landscape bund and associated infrastructure including drainage features on land at Cotmore Wells Farm, Towersey Road, Thame.
- 6.2 The report outlines the proposed scheme, identifies the key planning issues and highlights relevant Development Plan policies and other material considerations to assist Councillors when assessing the planning application. Where appropriate, commentary on the key issues has been incorporated to enable full assessment of the issues at the forthcoming Town Council meeting.
- 6.3 In this regard, Councillors will need to consider, at the outset, whether the principle of the proposed development is acceptable, weighing the conflict with Policy WS11 of the TNP (and any other policy) against the benefits of the proposed scheme, as outlined in this Report and contained in the various documentation submitted with the application.