



THAME

Town Council

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Graham Hunt, Town Clerk & RFO

Ref: GM/AO

Joan Desmond
Planning Officer
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Abingdon, Oxfordshire
OX14 4SB

14 May 2018

Dear Ms Desmond

Planning Application Reference: P18/S1243/FUL

Erection of a 68 bed care home and associated vehicular parking, landscaping, ancillary infrastructure and other works.

The above application was discussed at Full Council on 8 May 2018. The following resolution was passed unanimously:

Thame Town Council resolved to:

To recommend refusal in the strongest possible terms, given the conflict with the adopted Thame Neighbourhood Plan.

- 1. The application was seeking the loss of valuable employment land for which there was a significant, known demand***
- 2. No evidence had been submitted of a local need for the proposed care home, supported by the local Care Commissioning Groups***
- 3. It was likely the facility, which would cater for those requiring the highest level of care, would serve to increase demand on stretched local health services***
- 4. Such facilities should be planned for strategically, at a regional level, in order to locate them where the necessary supporting services are provided***
- 5. The facility is poorly designed.***

In detail:

- 1. The application was seeking the loss of valuable employment land for which there was a significant, known demand.*** The applicant suggests that the employment area they are proposing to develop is somehow redundant and there has been no interest following a marketing exercise. The Town Council notes the use of the word redundant and indeed, that very word is used within Policy WS12 of the Thame Neighbourhood Plan to describe the conditions under which the loss of employment land outside of the town centre would be permitted. The use of the word redundant rather than vacant is deliberate; it sets a higher threshold that must be passed. To be redundant, the site would have to be no longer required for employment purpose. Its location is excellent, being immediately opposite 3 hectares of employment land that was allocated within the Thame Neighbourhood Plan, and adjacent to the Town's eastern bypass. This employment land was built out and

occupied mid-2016, the only employment land to be delivered in the District since the adoption of the Core Strategy in 2012.

The District Council will be aware of the planning application for new employment land at Rycote Lane of some 6,500 sq.m. The District Council's Economic Development Unit noted in their response to this application that 98% of all commercial floorspace in the Thame area is occupied, a sign of a highly constrained economic land market. Some of this empty space was to be found in Jefferson Way in Thame. Permission has recently been granted there though for the wholesale refresh of the industrial estate, to bring all the buildings up to modern standards. It is expected this renewal will swiftly attract demand. Employment land in the Thame area is therefore proved to be highly desirable, for both local and inward investing businesses; with a healthy employment market operating at recommended vacancy rates of 10%, it can be seen that Thame cannot afford to lose any employment land. Should the proposal be granted, the remaining Kingsmead Industrial Estate will be at risk. Thame would then find itself in the ridiculous position of having to allocate many hectares of employment land on green fields within its next neighbourhood plan in order to make up for the loss of existing, valued employment land.

The proposed development occupies 0.56 hectares of land. This is not insignificant. The 2017 South Oxfordshire Employment Land Review (ELR) suggests that 0.5 ha would yield a net 2,000 sq. m. of employment floorspace for B1-B8 use class development in this out of town location (Paragraph 2.32). Using the same employment ratio given in the 2017 ELR this floorspace would yield the following full-time equivalent jobs:

- 160 office jobs, at one job per 12.5 sq.m.;
- 46 industrial jobs at one job per 43 sq. m.; or
- 31 warehousing jobs at one job per 65 sq. m.

The land should therefore be retained in employment land in order to protect the rest of the site, and intensified for employment floorspace purposes.

2. ***No evidence had been submitted of a local need for the proposed care home, supported by the local Care Commissioning Groups; 3. It was likely the facility, which would cater for those requiring the highest level of care, would serve to increase demand on stretched local health services*** The development is proposing a specialist care home use on a scale for which there is no locally identified need. The Oxfordshire Clinical Commissioning Group (CCG) have responded critically to this application, pointing out that adding 68 individuals who will have the very highest requirements for NHS care to the local area will place an unbearable strain on the local health services. Thame is simply not equipped for such a concentration of patients with dementia needs, or its associated complications. The local St Mary's Hospital is a modest health centre that only offers daytime outpatient care across parts of Buckinghamshire and Oxfordshire:

<http://www.buckshealthcare.nhs.uk/Thame/thame-services.htm>

4. ***Such facilities should be planned for strategically, at a regional level, in order to locate them where the necessary supporting services are provided*** The Planning Advisory Service, the All-Party Parliamentary Group Housing and Care Group for Older People, and the Local Government Association through guidance and recommendations advise local authorities to meet the local housing needs of older and disabled people. The requirement to do so has been built in to the 2004 Planning and Compulsory Purchase Act. How this should be achieved is commonly agreed. All the guidance states that the housing need for older (and disabled) people should be planned for within Local Development Documents. This is because housing for older

people is a matter that should be dealt with strategically, to ensure that local services are not saturated, and to give CCGs ample time to respond to recognised, genuine need.

5. ***The facility is poorly designed.*** The location for the proposed facility does not link well with local facilities. The nearest shop is 1.2 km away at a petrol filling station in Park Street. The applicant claims this is a 15-minute walk, but this would only be for those without any mobility problems. It is considered that staff, occupants and visitors would not have suitable access to even the most basic of convenience store items.

The Transport Assessment refers to multiple bus services. Only one, the 280, serves the adjacent bus stop. This is, however, only 5 times a day between 06:15 and 19:15. It is claimed one other service comes within 900 metres of the site, the number 40 which stops in Towersey Road (sic, this is Queens Road). With three shifts of staff to cater for, it appears that buses will not figure strongly as a method of access for staff or visitors. The applicant appears to have only responded to this by introducing a sub-standard level of bicycle parking.

6. ***Other matters.***

Transport:

- The Town Council has noted that the transport assessment refers 6 times to the adjacent permitted development as having 63 units, not the 45 granted prior approval by the District Council. No explanation for this is given.
- The Transport assessment looks in turn at each of the uses the applicant is proposing for the site. The care home scheme has its trip rates calculated through comparison with a range of sites around England, Wales and Scotland. The choice is strange. For example, in comparing the likely trip rates that will be generated by a care home development in an edge of town location in Thame the applicant has chosen towns and cities such as Derby, Southampton, Ipswich and Leeds, with Dunblane in Stirling being a statistical outlier. It seems odd to try to compare vehicle use in towns like Thame with areas with populations starting at 20 times that of Thame. These towns will have significantly different infrastructure to Thame.

Car ownership in areas that are well served by public transport is usually much lower than in semi-rural areas like Thame; indeed, of the 9 survey areas used within the transport assessment, 8 have lower car ownership levels per household than South Oxfordshire. Three of the areas have car ownership less than one third that of this District. The trip rates and parking demand looks likely to have been severely underestimated.

Housing

- The applicant may claim the care home rooms would count towards Thame's housing need. This is unlikely. The rules on communal establishments have recently changed in terms of how such accommodation should be recorded. The Government issues all local planning authorities with the Housing Flow Reconciliation Form, in order to balance differing means of calculating housing delivery (via Building Control, Council Tax, SHLAA monitoring, etc.). The guidance notes issued with this form suggests that the entire 68 units, because of the way in which they are delivered, would only count as a single dwelling for housing needs purposes.

Recommendation:

It is strongly recommended that this application be recommended for refusal. The planning application is seeking the loss of valuable employment land for which there is a significant, known demand. The site's location is not well connected with local services. No evidence has been submitted of a local need for the proposed care home, supported by the local Care Commissioning Groups. It is likely the facility, which would cater for those requiring the highest level of care, would serve to increase demand on the stretched local health services. Such facilities should be planned for strategically, at the regional level, in order to locate them where the necessary supporting services can be matched.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Markland', with a large, stylized initial 'G'.

Graeme Markland
Neighbourhood Plan Continuity Officer