

Full Council

Date:	31 July 2018
Title:	Land off Thame Park Road, Thame OX9 3JA
Contact Officer:	Graeme Markland, Neighbourhood Plan Continuity Officer

Background

1. The proposed development site is approximately 0.5 hectare in size, recti-linear, and aligned north to south. It is an area of agricultural land that is to the west of Thame Park Road. The site is part of a wider scheme for 175 homes given reserved matters approval by the District Council on 5 May 2016.
2. In late November 2017, the developer sought a pre-application discussion with Thame Town Council in its role as guardian of the Thame Neighbourhood Plan (TNP). The principle matter discussed was the issue of intensification on the site. The applicant stated that market conditions were not favouring the range of dwellings they had planned for. At the time, the Town Council gave the strong advice that it could not agree a change in the quantum of houses on the site as that had been agreed, along with the design principles for the site, through the referendum associated with the making of the TNP. This discussion is referred to within their Planning, Design and Access Statement, but this specific and clear advice is not mentioned.

Proposed Development

3. Application P18/S2069/FUL is for 25 dwellings, a density of around 17 per hectare. It is proposed that 8 of these dwellings will be for affordable housing. The proposed development comprises:

Open market:

- 8 x 2 bedroom terraced properties, of 2.5 storeys;
- 2 x 3 bedroom houses, detached, of 2 storeys;
- 1 x 3 bedroom corner house, detached, of 2 storeys;
- 2 x 3 bedroom dwellings, detached, of 2 storeys;
- 3 x 3 bedroom dwellings, detached, of 2 storeys;
- 1 x 4 bedroom dwelling, detached, of 2 storeys.

Affordable:

- 4 x 2 bedroom houses, 2 semi-detached, 2 terraced of 2.5 storeys;
- 4 x 2 bedroom terraced houses, of 2.5 storeys.

Summary

- 16 x 2 bedroom houses, 64% of the proposed scheme;
- 8 x 3 bedroom houses, 32% of the proposed scheme;
- 1 x 4 bedroom house, 4% of the proposed scheme.

4. It should be noted that the above definitions are those used by the developer. The majority, 24 of the 25 houses, are presented with offices, including the affordable homes. Some of these have been counted as bedrooms, some not. The reason for this is not discussed within the Design and Access Statement. This would present a sound use of "spare" space within the homes, but in most cases the offices are of a generous size. The 8 dwellings

labelled “B”, for example, the 2-bedroom “Souter”, each have an office around 9.3 sq. metres in area. Some rooms shown as double-bedrooms across the scheme have smaller areas.

5. When re-examined in that light, 16 of the above houses, those described as 2-bedroom, gain an extra bedroom. Two of the 3-bedroom properties also gain extra rooms. The development is, therefore, yielding 22, 3-bedroom properties and 3, 4-bedroom properties:

Open market:

- 14 x 3 bedroom properties, 56% of the proposed total;
- 3 x 4 bedroom properties, 12% of the proposed total.

Affordable:

- 8 x 3 bedroom properties, 32% of the proposed total.

Summary:

- 20 x 3 bedroom properties, 88% of the proposed scheme;
- 3 x 4 bedroom properties, 12% of the proposed scheme.

6. The above compares with 8, 4-bedroom, two-storey properties with studies, as permitted.
7. Fifty-one parking spaces are proposed for the development.

Discussion

8. **Housing policy.** TNP Policies H9 and H10 require applicants to provide a mix of housing types across their scheme, in order to meet the needs of future and current households, and demonstrate that they are reacting to true local need. The applicant claims in their Planning, Design and Access Statement that they have discovered a particular need for 2 and 3-bedroom properties in Thame. They claim to be responding to this but are only providing 3 and 4-bedroom dwellings. There are no two-bedroom properties. The reason for this is not explained within that Statement.
9. More detail is provided within the submitted Thame Specific Affordable Housing and Dwelling Mix Strategy (the Mix). The document states that “it has become apparent that the housing market in Thame has evolved since (the reserve matters) approval” and that changes are therefore proposed in order to take account of that evolution. In paragraph 4.2, the applicant declares “Despite this, comments informing the TNP support a recognised need for smaller homes (e.g., 3 bedrooms or less) within Thame.” It is not certain where, or perhaps when, these comments have arisen from, but more recent anecdotal evidence would support this. Members will be aware of Thame’s attempts to persuade the District Council to refresh their housing needs assessment to establish if the size of the house is the key driver, or the associated relative affordability of smaller units.
10. After reflecting on historic guidance in this matter, the applicants declare in paragraph 4.10 that the demand within the first phase of their development was greatest for 2-bedroom homes. The applicant claims a waiting list for this type of property. There is also, they claim, a high demand for homes of 3 and 4 bedrooms, with garages. The applicant then states that their mix of 2, 3 and 4-bedroom homes represents a mix consistent with the illustrated demand.
11. Although the applicant has included the affordable units in the above statement, they go on to further discuss the mix of affordable unit provision. They contacted SODC’s Housing Policy Team to establish a suitable mix, and were given the following suggestion for housing mix:

- 1 bedroom maisonette, 10%; 2 bedroom house, 50%; 3 bedroom house, 40%.

The applicant then refers in paragraph 4.13 to the mix of affordable homes across the wider Thame Park Road housing estates. The meaning of their argument is lost, due to the absence of key words within the paragraph, but the mix is reported as:

- 1 bedroom maisonette, 4%; 2 bedroom house, 43%; 3 bedroom, 38%; 4 bedroom house, 15%.

- For all of the history and arguments shown within the Mix document, it can only be described as odd that the applicant has submitted a mix that is contrary to all of those arguments in the matter of both the open market, and affordable homes. The applicant states they have evidence of need; they could have submitted the numbers of prospective clients interested in two and three bedroom homes on their scheme, and perhaps called in independent advice from local estate agents. As it stands, and with the mix of homes contrary to that they are arguing for, the applicant has not met the requirement of TNP H10 in demonstrating that they are providing a Thame-specific mix. When judged as an individual scheme, it is open to debate whether the applicant has or has not met the requirement of TNP H9, in providing a sufficient housing mix.
- Housing density.** The applicant claims the site area of their proposed development is 2.97 hectares, giving a density of 8.4 dwellings per hectare. This is wrong. The best estimate of the site area, without the benefit of a full geospatial analysis software package or digital drawings, is 0.5097 hectares; this gives a net density of approximately 49 dwellings per hectare. Within Section 3 of the TNP, the principles of residential density across the major housing allocations is given. It is stated within paragraph 7 of Section 3 that in order to successfully address landscape and visual impact concerns, an overall gross density of 20 dwellings per hectare had been assumed.
- The proposed development is within an area allocated through TNP Policies H1 and HA3, and was called Site D. This site was allocated exactly 175 dwellings through Policy H1 on a site that delivered at a gross 20.5 dwellings per hectare. This policy clearly states that permission will be granted for the allocated quantum of dwellings, subject to the proposal meeting the policies of the TNP and the District's Core Strategy.
- Policy HA3 prescribes that 175 dwellings must be provided within the 8.5 hectares identified for residential development. The number *is* prescribed; no range is offered, nor permissible. The current development proposal would provide 192 dwellings on HA3, Site D and is clearly contrary to HA3. This would yield development at a gross 22.6 dwellings per hectare.
- Figure HA6 clearly demonstrates that the application site borders one of the main green corridors through Site D, and should, therefore, demonstrate **lower** development density than the rest of the site.
- Housing need.** Within their Planning, Design and Access Statement the applicant claims within section 2.4 that the Core Strategy and TNP are both out of date due to the fact the housing allocations within them date back to the days of regional plans. In its place, they argue that the 2014 SHMA figures are more reliable and should now be given regard, as should the proposed allocation for Thame of 510 dwellings.
- The SHMA-related figures are in themselves, similarly out of date. Indeed, they should be given less regard than those from the Core Strategy as they have not been through public examination within the District. The District will shortly find itself in the position of having to either plan for a level of growth that is consistent with the Oxfordshire Growth Deal, and

justify the associated extreme, housing-related economic growth against a background of limited support, or move in line with the national methodology.

19. The District Council has just released the proposed revision to its Local Development Scheme. This is the published statement of the District Council's timetable for its ongoing Local Plan review. The earliest we may know which target the District Council will adopt for housing growth is January 2019, the point at which the District re-publishes its Regulation 19 (pre-submission) Local Plan for public consultation.
20. On the basis of the information in front of the Town Council, it would be unwise to commit to any deviation from the TNP, even if there was public support. The Town Council has, within pre-application discussions with the applicant, always stated support for any re-examination of the proposals as part of the review of the Thame Neighbourhood Plan; similarly, ahead of any review, we would support any review of the existing permission, as long as the quantum of development did not change. The applicant could even simply submit an amended scheme, substituting small houses in the place of larger ones.
21. **Affordable housing.** The applicant states that they have used an approach with other councils whenever they have taken a small part of a site to be redeveloped. Instead of assessing the new area as an individual unit, they amalgamate it with the whole site. It would have been helpful if the applicant could have given examples of such cases, as using this proposed methodology the number of affordable units is reduced from 10 (40% of 25 units) to 8.
22. The applicant appears to be suggesting that the 8 affordable units will be provided *in addition* to the 70 affordable units, previously agreed. This does therefore represent a small gain in affordable housing units, up to 40.6%, against 40%. Achieving 10 dwellings would be possible, should the District decide that the proposal warrants a substantial departure from the TNP.
23. **Design.** Within their Planning, Design and Access Statement, the applicant states the scheme has been designed with reference to the NPPF and the South Oxfordshire Design Guide. In relation to the TNP, the applicant states that linkages to neighbouring sites, public spaces and the countryside will be retained; and they declare they are maintaining the sensitive edges to the development, as required by TNP Policy HA3.
24. In maintaining committed road and pathways, the applicant has kept links to adjoining sites and the countryside. However, in increasing the density of around 50 dwellings per hectare, the planned green corridor now has a highly urbanized street scene adjoining it. Such a street scene is more suited to development adjacent to a major transport node or neighbourhood or town centre of a large town or city. This does not meet the requirement of Policy HA3 in creating a high quality environment for the green corridor that links the countryside to Jane Morbey Road. Furthermore, the scheme as submitted both fails to demonstrate how it to relate well to its surroundings, i.e., the earlier phase of development, and that yet to be built. This is wholly absent from the Planning, Design and Access Statement and is, therefore, contrary to TNP Policy ESDQ16.
25. The Planning, Design and Access Statement does not include an assessment of how the key features of Thame's character has influenced the scheme proposal, and is therefore contrary to TNP Policy ESDQ17. It furthermore fails to demonstrate how the development would reinforce the character of Thame, and is therefore also contrary to TNP Policy ESDQ15.

26. The materials proposed for the development are identical to those already approved as part of the wider scheme, a mix of dark and light bricks and grey and brown concrete tiles. The materials to be used for windows, doors, guttering, soffits, etc., are not mentioned.
27. It is a requirement of Policy ESDQ27 that the often “forgotten” design elements of schemes are included from the start of the design process. On this matter, it is notable that although gutters and downpipes are shown, and the ghost-like images of options for utility meter cupboards, other important items such as bin stores, bicycle storage or parking, are not. Policy ESDQ27 has only been partially met.
28. **Landscape impact.** The site will be one very visible part of a much wider development. Identified as an essential development principle within HA3 was the need to minimise impacts on long views from and into the allocation site. The green corridor that runs from Jane Morbey Road provides one of the key long views. In intensifying the eastern edge of this green corridor the proposal will harm what should become one of the more interesting and attractive views into Thame. This is contrary to HA3, and would undermine key objectives of the TNP, namely those seeking to improve existing open space and the connections to it, and that looking to reinforce the character and quality of Thame.
29. **Transport.** The developer quotes from Oxfordshire County Council guidelines. The Oxfordshire County Council guidance is not, however, part of the South Oxfordshire Development Plan. For guidance on parking the applicant should have looked to the 2011 SODC Local Plan; however, in this case, the allocation from the developer may have been similar in that, against the minimum requirement of 50 spaces, 51 have been provided, excluding 5 garage spaces.
30. In terms of cycle parking, none is indicated, nor sheds to store them in. This is simply contrary to TNP Policy ESDQ27, which requires the frequently “forgotten” elements of planning applications to be designed in from the start. It is also contrary to SODC Policy D2, which would require a minimum of 2 bicycle parking spaces to be identified, plus one space for every two homes on the scheme.

Recommendation:

31. The proposed development is contrary to principles and policies within the Thame Neighbourhood Plan. Members are reminded that Thame Town Council provided significant support to the applicant in their bid to secure the original planning permission for 175 homes and have always stated their support for any new, compliant planning application. It is recommended that this development proposal is recommended for refusal.