



GM/AO

Tom Smith  
The Planning Inspectorate  
Room 3P Kite House  
2 The Square  
Bristol  
BS1 6PN

31 July 2018

Dear Mr Smith

**Planning Appeal reference: 3173982**

**Site Address: Thames Valley Police Station Greyhound Lane Thame OX9 3ZD**

**Description: Redevelopment to form 41 sheltered apartments for the elderly, including communal facilities, access, car parking and landscaping.**

Thame Town Council wish to present their final comments on this scheme. Please note that we are altering some of our earlier comments due to communication received from the applicant's agent, Simon Cater, on 18 May 2018.

Details of our concerns are included below. Headline summaries follow here:

- We withdraw our earlier objection regarding air quality in the proximity of the proposed development.
- Subject to the adoption of an amendment suggested by the applicant, the Town Council withdraws its earlier objection regarding pedestrian access into the scheme.
- The Town Council's concerns regarding parking levels remain extant.
- Our concerns regarding vehicle access remain extant.
- The extremely small amenity area identified for the 41 households at the easternmost-end of the development is contrary to Thame Neighbourhood Plan policy.
- The Town Council's earlier concerns regarding the quality of external amenity provision remain.
- We are raising concern over the setting of heritage assets within the Thame Conservation Area, in relation to the scheme's design.
- The Town Council's objections in matters related to design remain extant.

## Air Quality

Within our original representation to you, dated 10 January 2018 (Markland G 289214), it was stated by us that the matter of air quality had not been resolved between the applicant and the District Council's Air Quality Team.

The appellant's agent has, in his letter to Thame Town Council of 18 May 2018, helpfully drawn to our attention further communication between the Air Quality Team, the District's planning case officer and their air quality consultants, most of which is not in the public domain. Thame Town Council confirms that on the basis of this, plus confirmation of the fact from the District Council's Air Quality Team, we withdraw our objection on the grounds of air quality.

## Parking

The applicant's agent has helpfully made the Town Council aware of Appendix 15, their Transport Hearing Statement, was made available only after our original hearing comments were submitted on 10 January 2018.

The Town Council has the following comments to make regarding Appendix 15:

1. the bus stops closest to the site, identified on Figure 4 as A and B, are single poles with timetable information, not the covered, seated facilities with real time passenger information, as claimed;
2. Local bus services 120, 123 and 124, described within Table 1 as operating within easy reach of the site, were withdrawn from service in July 2015;
3. The use of "neutral days" in which to carry out car surveys at each of the selected Churchill Homes sites was questioned by both the Town Council and the County Highways Team. One of the days chosen was Tuesday, Thame's market day, which can be busier than some Saturdays. Greyhound Lane becomes a car park in itself, with queues to access the Waitrose Car Park forming for several hours across Tuesday, Saturday and most Sunday mornings (see photographs, below).

The Town Council's earlier comments, driven by local, peak-day knowledge and the comments made by Oxfordshire County Council regarding both trip generation and car parking provision, both in numbers and the availability of disabled spaces, remain extant.



Figure 1 Greyhound Lane queue, 09:50, Tuesday 3 July 2018



Figure 2 Greyhound Lane Queue 10:40, Tuesday 3 July 2018

## Access

Within the agent's letter of 18 May 2018 the agent has clarified that the pedestrian access into the proposed scheme will, at its narrowest point, be 1.2 metres in width. The applicant also states that, through drawing D6/19A, a doorway opening from the ground floor, southern corridor has now been recessed to avoid opening onto the pathway. Should this amendment be incorporated as part of any approved scheme, Thame Town Council can confirm its concerns over pedestrian access would be mostly mitigated. Some concern remains over the interaction of pedestrians, mobility scooters and vehicles.

Our previously stated concern regarding vehicle access remains, however. The agent has helpfully declared the height of the proposed access, under the bridging structure on the western wing, to be 2.3 metres. As described, the access opens onto Greyhound Lane, which is just 60 metres long from its junction at the northern, roundabout end to the blind 90 degree bend at its southern end. The land rises between 5-10% along the length. Greyhound Lane provides the sole entry for customer and vehicle access to the main supermarket in Thame, plus 10 other businesses. The roadway and pavements are narrow, and the road is lined along its length with double-yellow lines, with no waiting or stopping permitted.

Within his letter to us, the agent declares that "if there is an emergency and an ambulance attends the development, the ambulance would park either on Greyhound Lane or pull in and block the entrance of the site. This would also be the same for any deliveries or refuse collection and due to the limited time the vehicle would be present, would have minimal disturbance to the access or to Greyhound Lane."

Our first observation is that in placing a vehicle across the entrance to the site, within its bellmouth, safe pedestrian access across the entranceway to or from North Street would be compromised by the presence of unmanned, tall, wide vehicle or vehicles blocking the safe crossing point.

Our second observation is, therefore, that delivery vehicle drivers would have to place themselves in the position of committing an offence by parking in a no stopping or waiting zone. Deliveries will need to be made to the door of each flat. Supermarket food delivery drivers are expected to not only deliver items to the door, but to help the householder unpack the items, should they request it. Loading and unloading will not,

therefore, be quick events. Regrettably, the Town Council can see that the appellant will argue that the presence of double yellow lines means that any uncontrolled parking issues can be handled through parking enforcement. The double yellow lines in Greyhound Lane, though, primarily act to ensure public safety. The overburdened Thames Valley Police, who would be responsible for enforcement in this road, should not be forced to allocate resources to a matter that is avoidable, should the condition already requested by the County Council's Transport Team be put in place.

The County's Transport Team has requested a condition that vehicles, including refuse vehicles, can enter the site, turn and leave in forward gear. This was purely recommended in the interests of highway safety, in accordance with SOLP 2011 Policies T1 and T2. The idea was to prevent waiting on Greyhound Lane. This condition was not proposed by the Development Management Team, nor were these concerns conveyed to the Committee. Thame Town Council stated the Transport Team's concerns at the Planning Committee of 5 April 2017 and repeats those same concerns, now.

The Town Council have previously pointed out that the height restriction caused by the bridge structure would prevent access by taller delivery vehicles, day care transfer vehicles, and all refuse vehicles and ambulances. This is particularly significant given the concentration of older people who are more likely to receive home deliveries and visits, plus both emergency and planned ambulance transfers. As stated by Thame Town Council in its earlier representation, the South Central Ambulance Service NHS Foundation Trust ensure that as many patients as possible now receive emergency treatment at home. Around 50% of calls will result in treatment on-site ("see and treat") and this results in the ambulance unit remaining outside the patient's home until the patient has been stabilised (source: SCAS Oxfordshire Community Engagement Forum, 31 May 2017). Each visit can take, literally, hours; please see this news article where a reporter recently spent a day with a SCAS ambulance crew:

<https://inews.co.uk/news/health/paramedics-ambulance-crew-typical-day-emergency-medicine/>

Due to access restrictions within the proposed development all delivery, mini-bus, refuse and ambulance visits will need to wait on Greyhound Lane in the no-waiting zone. This would require vehicles having to pass them, crossing into the path of any oncoming vehicle leaving the Waitrose car park or the Waitrose / Greyhound Lane service yard. Vehicles visiting or delivering/collecting people and goods to the development will "stack", further endangering highway safety.

## **Noise**

Thame Town Council's objection to the proposed scheme with regards to the level of external noise the amenity areas would experience remain extant. It is noted that noise levels are likely to be met in the proximity of the pergola area, the "designated external amenity area", as shown within the appellant's Noise Impact Assessment. However, the District's Environmental Protection Team notes that the levels of noise recommended by the World Health Organisation for external amenity areas will be exceeded over most of the site.

Within paragraph 7.3 of the Noise Impact Statement it is suggested that the pergola and patio structure adjacent to the Waitrose Car Park is the only amenity area. It is described as the "designated area of external amenity...". It is therefore implicit that

patio areas adjacent to ground floor flats and the other grassed and planted areas around the development are **not** seen as external amenity areas by the applicant.

If this argument is accepted, then the scheme is clearly contrary to Thame Neighbourhood Plan Policy ESDQ28, which requires that good quality, private outdoor space is provided for all new dwellings. It should not be argued that the outside amenity space for 41 households can be limited to an area that can be counted over only a few square metres, in only one part of a development, and that could seat only a few individuals.

Should the remaining landscaped areas and patios be accepted as amenity space, however, then the scheme would remain contrary to Policy ESDQ28, as good quality, private outdoor amenity space would not have been provided. Put bluntly, if the outdoor areas are too noisy, they will not be used.

The presence in the area of nearby short and long walking routes does not, in the view of Thame Town Council, replace the need to provide good quality private outdoor space. This has been argued as a partial solution by the appellant's agent in their letter to Thame Town Council of 18 May 2018.

Thame Town Council also does not recognise the suggested, alternative paved entrance area adjacent to the car parking as an amenity area, although it is identified as such in the applicant's Noise Impact Assessment. There are no seats or planted areas shown on the design. It is likely this is the main assembly point in case of emergency; this has not been refuted and so we believe this must be the case. It would not, therefore, be able to be "cluttered" with furniture or features. This should not be treated as an amenity area as it will not be capable of being used as such.

### **Impact on the Thame Conservation Area**

It has been previously noted by Thame Town Council that the District Council's Conservation Officer perhaps dwelt a little too much on the consideration of how the current scheme compared to earlier, appealed, 2014 scheme (P14/S0880FUL). Having considered these comments further, the Town Council has become aware that no consideration has been given to the setting of the listed buildings within it. The following Grade II listed buildings will be visible in direct views, looking towards the development:

- 9 Bell Lane;
- 16, Aylesbury Road (Godbegot);
- 18, Aylesbury Road (Gable Cottage).

There is, therefore, the potential for the proposed development within the Conservation Area to directly improve, or cause harm, to the contribution the setting of these listed buildings. Other listed buildings nearby would not be directly visible to or from the proposed scheme, yet the potential for improvement or harm to their setting exists, too. These include:

- 6 – 8 Bell Lane;
- Tripps Cottage, Moorend Lane;
- Bishops Palace, Moorend Lane;
- Ash Tree Cottage, Aylesbury Road;
- Lashlake Cottage, Aylesbury Road;
- Lashlake House and former warehouse building, Aylesbury Road.

The application site has the potential to make a better contribution to not just the Conservation Area, but to the setting of the heritage assets within it. The threshold for good, sympathetic design in this gateway location should be set very high.

### **Design**

Due in part to our comments on the setting of Thame's heritage assets above, Thame Town Council's representations regarding design, made 10 January 2018, remain extant.

### **Communal facilities**

The applicant's agent, within their letter to the Town Council of 18 May 2018, points out the guest suite is their contribution to communal facilities. The presence of this was not disputed; the agent may well have been responding to a comment by the Town Council that, on reflection, could have been clearer. As part of Thame Town Council's objections we noted that the only communal facility now being offered – the guest room – is also sometimes offered in open market apartment schemes. This was part of our wider point that the applicant was not providing any facility or service associated with elderly living that is not available on other open market, non-age-restricted housing schemes. The scheme is merely a housing project marketed for older people; the benefits should not be overstated.

Thank you for the opportunity of allowing Thame Town Council to enlarge once again on some of our earlier commentss, and to respond to emerging evidence. Please do not hesitate in contacting us should you have any queries regarding our representations.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Graeme Markland".

**Graeme Markland  
Neighbourhood Plan Continuity Officer**