

Date:	18 December 2018
Title:	Land at The Elms Upper High Street Thame OX9 2DN
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Background

1. Members will recall that land behind The Elms in Thame was allocated within the Thame Neighbourhood Plan (TNP) for up to 45 homes. In August 2015 a planning application for 37 dwellings and publicly accessible open space, P14/S2176/FUL, was granted permission. In July 2016 an application for 87 dwellings and apartments for extra care homes was applied for but withdrawn prior to determination on 15 November 2016. In March 2017 planning application P17/S1069/FUL, for 85 dwellings and apartments for extra care homes was submitted to the District Council. Permission was refused on 16 February 2018.
2. Since the granting of the 2014 permission a number of conditions have been signed off covering matters such as archaeology, parking, air quality, materials and landscaping. Since the formation of the highway access on Southern Road and a commencement of the foundations of some units that permission will remain extant.

Proposed Development

3. Application P18/S3596/FUL is for 78 units of housing with care, under C2 of the Use Class Order, on around 2.9 hectares of land. The properties will not be available for general rent or sale but will be restricted to those of retirement age. On-site domestic help will be available. The schedule of properties declared within the planning application is:
 1. 1 x 2 bed house;
 2. 1 x 4 bed house;
 3. 16 x 1 bed flats;
 4. 48 x 2 bed flats;
 5. 12 x 3 bed flats.
4. It should be noted that the above definitions are those used by the developer. There is no 4 bed house shown on the accompanying plans; there is a three bed house and 3, rather than 1, two bed houses.
5. It is intended the site will be served using the existing, developed entrance off The Elms road and via the pedestrian entrance from the Upper High Street, with a new one to be formed through to Elms Park. The paths are intended to be mixed use, allowing for cycling through the public open space which will total around 1.1 hectare.
6. In terms of car parking, 65 spaces are proposed. It is proposed that there will be other mitigation (details below).
7. A 2-storey residents centre will provide a small gym, 3 function rooms including one with a bar, and 3 treatment rooms.

Discussion

8. **Housing with care.** The applicant is intending to provide 78 houses allowing independent living for older people, with some care provided. It is worth outlining the difference between the proposed type and extra care housing:
1. Housing with care – this is private market housing for sale without the benefit of subsidies for either capital or revenue purposes.
 2. Extra care housing – this is subsidized, often through a housing association for either rent or shared ownership.
9. Otherwise, the two housing models work in similar ways. Householders live independently but can receive care from the on-site providers. This can be for both personal and domestic care purposes. As needs increase, the level of care rises, too.
10. Considerable benefits are outlined in an evidence document, Housing with Care in Thame, June 2018 (HWCIT) that accompanies the application. This draws on other sources, including a report by the Housing Learning and Improvement Network (HLIN), an industry sharing and learning network. This report brings multiple case studies together.
11. It is worth noting that most of the evidence and studies outlined within these documents are drawn from extra care and sheltered housing schemes. This may be due to the relative paucity of housing with care schemes. Equally, as most extra care and many sheltered housing schemes are run by housing associations, their institutional nature and funding through public sector spending means they are more likely to be both more accessible to researchers, and subject to greater scrutiny.
12. Benefits claimed include:
1. Enabling older people to be confident their future care needs will be met;
 2. Enabling couples to stay together;
 3. Reducing loneliness through increased contact, communal areas and shared social activities;
 4. The release of family homes into the market;
 5. Avoiding unnecessary entry into residential care;
 6. Housing with care has been shown to avert falls (page 3, HWCIT), thus reducing pressure on health services (this specific claim is unreferenced);
 7. In a study of an extra care housing scheme it was found that unplanned hospital stays were reduced from between 8 – 14 days, to between 1 – 2. Routine GP visits also fell by 46%, after a year;
 8. Extra care housing leads to residents requiring smaller “care packages”, with one study showing 16% less expenditure per head (this study is incorrectly attributed in the HWCIT document as carried out on housing with care: see HLIN Case Study 129);
 9. The above cost saving would reduce the need for residents in housing with care schemes to rely on the state, once their personal funds have run out.
13. The benefits listed above are tangible. They show clear gains for the individuals, identifiable reductions on the burden on health services and for the wider society, reduced costs. With almost all of the evidence available deriving from extra care schemes though questions remain regarding the benefits when applied to a premium housing with care scheme.
14. For example, the study that showed a reduction in the costs associated with individual care packages found annual savings of around £2,400 per head. When applied institutionally, this is significant. For an individual in a housing with care scheme though this would represent just a fraction of the annual maintenance fee associated with their scheme.

Although possible, it is less likely that such individuals will be forced to rely on the state for such support.

15. The HLIN report brings together the findings of multiple studies:
 1. A reduced risk of falls (note that 75% of falls do not involve stairs);
 2. The significant savings associated with each prevented fracture;
 3. One study showed that the cost of homing 1,200 residents in sheltered accommodation was over 25% less than housing just 120 in residential care (The Value of Sheltered Housing. National Housing Federation (Berrington) January 2017). It could be reasonable to assume that avoiding unnecessary entry into residential care is a valid reason to encourage extra care/housing with care schemes even if the benefits are not yet similarly enumerated;
 4. An identified saving of £5,000 per person through delaying entry into residential care;
 5. £900 saving through the on-site provision of installed equipment and adaptations aimed at reducing home visits.

16. Once again, these costs savings must be looked at in light of the proposed development at The Elms. The proposal has been identified within the HWCIT study as being a “mid-market” scheme (page 6, HWCIT), mainly because it does not offer shops, beauty parlours and restaurants, on-site; these are obviously found instead on Thame’s adjacent high street. Due to the size of the properties, plus their intended materials and immediate environment it is clear this scheme would be in the upper end of the housing market. Comparisons have been made by the applicant with the nearby Beechcroft retirement housing scheme. These are a mix of 2 and 3 bedroom homes, the smallest of which is over 17 sq. m. larger than the smallest of the similar units at The Elms. The largest is around 76 sq. m. larger than its comparator at Beechcroft. For comparison, 76 sq. m. would itself qualify as sufficient for a 3-bed, 4 person flat using the optional national space standards. As the cheapest Beechcroft property sold for £350,000 (source: Land Registry July 2018), and with the median price for the development being well over £100,000 higher, the proposed dwellings would be priced significantly higher than those at the Beechcroft development.

17. This means that future residents may not achieve a significant enough gap between the sale value achieved on their home and the cost of one of the proposed dwellings to give them the confidence to use their savings to offset their care cost. Maintenance costs for each household, with the one or two hours domestic help a week is likely to run to 10s of thousands of pounds. A reliable private income is likely to be required to afford to live at The Elms.

18. For the cost of one year’s maintenance, a significant amount of adaption, maintenance and general and personal care could be bought while remaining in their existing home. The cost of moving housing should be factored in this decision; £22,200 is the average, all-in cost of a house move in the south-east (Consumer Association, 2018).

19. It is therefore more likely that a household with a dependable income, and who are sitting on a valuable asset will be able to withstand moving into residential care (whether state-funded or not) much longer than a household with a lower income. The cost saving to the public purse will not be as significant as for those who typically move into extra care schemes.

20. Benefits that are not affected by income, such as a reduction in the incidence of falls (49% in the private home, 31% in extra care homes) remain applicable.

21. In page 2 of the Housing with Care in Thame paper it is stated “not all the residents will need care but its availability acts as a sort of insurance policy”. This may need clarifying as both

the Transport Assessment and the Planning Statement state that at least one member of each household will require care.

22. **Affordable housing and obligations.** The Government has prevented local authorities requesting affordable housing from C2 schemes and the District Council is not currently seeking planning obligations from C2 developments. The applicant has once again offered to match the level of contributions sought in respect of the permitted, 37 dwelling scheme. It is worth noting that this scheme will utilise a similar build and infrastructure pattern to the permitted scheme, and so the unavoidable costs of foundations, paths and roadways, etc., would be similar, too.
23. **Need.** Within the HWCIT report (page 6) it is stated that the demand for housing with care is difficult to determine. It is a relatively immature housing model.
24. General commentary is provided within the HWCIT report about the ageing population which would suggest a growing need:
- There will be around 80% more over 85s by 2031 in Oxfordshire (Oxon Joint Strategic Needs Assessment, 2017);
 - People are living with poor health for increasingly longer;
 - Demand for care home places will increase by 70,000 by 2025 and 190,000 by 2035 nationally (The Lancet, 2017);
 - In Oxfordshire, 12% of over 65s live alone in 4-bed houses, against a national average of 7% (Oxon JSNA, 2017).
25. The HWCIT report states housing with care needs to be provided at a very local level as people wish to stay within their communities. An industry report quoted stated that for extra care schemes around 39% of residents came from within 3 miles of a site; and 31%, within 10 miles (Extra care housing: where do residents come from? Carterwood Focus Issue 13, 2014). Page 3 of the report notes that distance of origin increases across rural areas, particularly where a scheme is offering a “lifestyle choice” (The report goes on to note that a travel distance of 20 miles would be expected for a top-end scheme).
26. The author of the note declares the proposed scheme as being mid-market; as discussed above, that is arguable, but the author does choose a relatively conservative 10-mile radius of Thame to be taken for possible future residents (note: it is claimed that this has only been projected into Oxfordshire, to accord with County-led needs assessments).
27. Figures are then given for need, identified by using an Oxfordshire County Council formula of 55 units of extra care per 1,000 people over 75 (Extra Care Housing Market Position Supplement 2017, OCC).
1. For Thame, it is stated that this would result in 63 homes for extra care housing by 2030, rising to 97.5 by 2030, given a current over-75 population of 1,155 (it is assumed ONS 2016 mid-year estimate is the data source);
 2. For an Oxfordshire-only radius of Thame extending 10 miles, this would give 223 units of extra care, based on an over-75 population of 4,049, rising to 342 by 2030.
28. Simplistically, it looks as if Thame has a potential need for 63 extra care homes, now. Thame does however already host 40 extra care housing units at Windmill Place, for rent or shared ownership. If an assumption is made that the methodology is correct then Thame would have an immediate need of 23 extra care homes with an extra 160 to take account of residents who live within the 10-mile buffer.

29. The 10-mile buffer that extends into Oxfordshire would take in Cowley, Chalgrove, parts of both Berinsfield and Benson, Watlington, Chinnor, etc. It should not be simply assumed that Thame will be seen as a go-to destination for either housing with care or extra care schemes; each of these communities, and others within the buffer radius may well have local provision planned. Each community would naturally have the ability to travel in any direction in their search for a suitable scheme; and from each, a large proportion of the individuals would presumably refer to remain within their community, as identified in paragraph 24) above. Establishing the correct level of either extra care/housing with care for Thame will not be a simple exercise.
30. The above methodology does not in any case necessarily apply to housing with care, for which the need/market is unclear. Within their Planning Statement the applicant points to several revisions within the NPPF that support their scheme. Their main points, plus officer commentary, follows:
1. "it is important that sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay" (NPPF, paragraph 59);
 - The allocation of The Elms within the TNP was in response to needs identified within the 2012 Core Strategy. It is noted that the site has extant permission that would contribute to meeting these needs but that the land is not being developed without unnecessary delay.
 - Paragraph 60 of the NPPF states that in order to identify the needs of specific groups, a local housing needs assessment should be undertaken with a view to informing strategic housing policies in development plans.
 2. "the size, type and tenure of housing needs of different groups within the community – including older people – should be assessed and reflected in planning policies" (a paraphrase of NPPF paragraph 61 from the applicant's Planning Statement);
 - Paragraph 61 actually states that within the context of the need to identify the needs for groups via a housing needs assessment the size, type and tenure of the housing required should be assessed and reflected in planning policies. The paragraph lists as examples those who require affordable housing, families with children, older people, students, etc.
 3. "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles, especially where this would address identified local health and well-being needs" (paraphrase of NPPF paragraph 91 a - c);
 - Paragraph 91 actually states "aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres..."
 - It is argued that the extant housing scheme granted under Policy HA4 offers a greater opportunity for people to mix who would otherwise not. In fairness other principles of Paragraph 91 would be met by either the permitted, or proposed scheme (such as street layouts that permit clear, legible pedestrian routes).
 4. "Planning decisions should promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively" (NPPF, Paragraph 118);
 - Helpfully, paragraph 118 goes on to give examples of such underutilised land and buildings: "(for example converting space above shops, and

building on or above service yards, car parks, lock-ups and railway infrastructure)". The meaning of this NPPF paragraph could not be clearer in its interpretation of what is considered underutilised; sites on greenfield land with extant planning permissions for housing supported by adopted development plans are not under scrutiny, here.

5. "Planning decisions need to reflect changes in the demand for land" (paragraph 120); and "Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs, and in the interim, prior to updating the plan, applications or alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for redevelopment in the area" (paraphrase of NPPF Paragraph 120 from the Planning Statement);
 - Paragraph 120 is sensibly reminding planning authorities to ensure that allocations are relevant. It also gives planners the option to deallocate sites that have not been successful. However, this argument is largely irrelevant in this case as it is aimed at preventing sites being held for decades for aspirational leisure or commercial schemes that will never materialise, not housing for which there is a proven need.
 - The site has extant permission for a use identified within an adopted development plan with extant housing policies. It has been suggested by the applicant that the homes within the permitted scheme are too large for the market, hence the need to change the scheme; the simple idea of reducing the size of the larger properties has not been explored.

31. The applicant also paraphrases planning guidance paragraph 020 Ref ID 2a-020-20180913. They state need to provide housing for older people is critical as people are living longer lives and the proportion of older people in the population is increasing. Excluded from this guidance paragraph is that it is expected that "strategic policy-making authorities will need to determine in relation to their plan period the needs of people who will be approaching or reaching retirement as well as older people now", i.e., work from a needs assessment through to policy and site allocations.

32. As ever, all of the above has to be read in conjunction with the rest of the NPPF, associated guidance and the local development plan.

33. It appears that the Oxfordshire Clinical Commissioning Group (OCCG) share this concern; they have responded in a similar manner to the last two applications, citing concerns over the introduction of around 80 units of extra care homes (sic). The OCCG point out that only residents with health concerns can live within the properties. They object as no mitigation is proposed to alleviate the pressure the new households would have on local health provision.

34. **Design.** The latest scheme has been reworked to fit more within the footprint of the approved scheme, with some alterations. The visitor centre has been reduced in size, and glazed links between homes and garage/studio offices have been removed. The latter was perhaps inevitable, given the wholesale change away from garages with offices above to carports with flats above. All garage doors have been removed from parking structures.

35. There have been considerable changes to the fenestration and wall arrangements on the eastern-most units, formerly known as "Parkside". These are described as being in an area of "lower sensitivity" in that they cannot be seen from The Elms. Balconies have gone from the western elevation, and the elevation is now more or less uniform between floors. This is regrettable, given the prominent position the properties will occupy in Elms Park.

36. Similar treatment has been given to the western elevations of the two main crescent blocks. Again, this simplification is to be regretted given their prominent place in the parkland and the setting of the adjacent listed buildings and Thame Conservation Area.
37. It is clear that the mews flats adjacent to both the crescent and eastern flats fail to meet the minimum distance requirements between properties indicated within the South Oxfordshire Design Guide (November 2016). The Guide should be referenced when responding to Core Strategy Policies CSQ3 and CSQ4, and TNP Policy ESDQ15, which are of relevance, here.
38. Windows have been added to the ends of the eastern terrace at ground and first floor levels in order to provide passive observation over the new footpath/cycleway between Elms Park and The Elms. This is sensible and an arguable aesthetic improvement.
39. The 3 terraced houses that backed onto The Poplars in the original design have been replaced by 2 semi-detached houses of 2 and 3 beds and 4, 1 bed flats. These have been reorientated to look north-south.
40. It is not possible to report materials in depth as a section of the Design and Access Statement is missing. This will be reported verbally, at Committee, if they can be established in time.
41. **Ecology.** The site has now been subject to an investigation in 2011, with updates in 2013, 2014, May 2016 and January 2018. The applicant's consultant and the District ecologist are broadly in agreement. The following observations and recommendations were made:
- Bats – roosting opportunities exist among the mature trees, which also provide a foraging habitat. The site will act as a bat commuting route;
 - Badgers – there are 3 sets on site, one of which is only 5 metres from the nearest development. This will require closure, under licence;
 - Fitting 10 bat boxes and 5 sparrow terraces will help improve opportunities for improving biodiversity;
 - Protect the existing tree root network from harm;
 - Improve the southern and western tree lines with new native species trees.
42. With regards to flora, the semi-improved grassland on The Elms offers little diversity and can generally be recreated elsewhere. The trees and shrubs on site currently offer limited attraction for foraging insects and mammals.
43. **Flood risk.** The accompanying flood risk assessment notes no major concerns. Between 25 – 50% of the site is at risk of groundwater flooding, although no record exists of this having occurred. Only one record of sewer flooding is found within the postcode area. As for surface water flooding, the assessment concludes that the housing is all within areas of very low risk; however, it is noted that updated data available for surface water flooding from the Environment Agency shows a low-mid risk area where the 2 semi-detached houses and 4, 1 bed flats are proposed. It is probable this new data is reporting greater accuracy, as adjoining risk contours in East Street and Park Street have changed considerably, too. This may require further investigation in order to establish if mitigation will be required for the properties potentially at risk.
44. **Heritage assets.** There are four listed buildings within the immediate area; Gallup Poll Garfield, a grade II* property fronting the Upper High Street; The Elms; the adjacent Barn and the Poplars. The applicant's Heritage Statement (September 2018) identifies 77 Park Street as being potentially harmed, too.

45. The recent Heritage Statement offers a fair appraisal of the assets and the potential for harm the proposed scheme represents to each. The statement notes the “minor changes” such as the changes to the windows, removal of garage doors, etc. It concludes:
- There will be negligible impact to the setting of The Poplars, and no harm to the building itself;
 - The impact on The Barn will be similarly negligible;
 - There will be a minor adverse impact on the setting of both The Elms and the Thame Conservation Area (TCA) (paragraphs 9.6 and 9.20, respectively) due to “a partial loss of openness to the south”;
 - The large area of open space will act as a transition one between the commercial activity on the High Street and the residential areas to the south;
 - It concludes in paragraph 9.23 there will be no harm to the character or appearance of the TCA;
 - Overall, there will be less than substantial harm but there will be no inferred loss of significance by way of impact on the setting (paragraph 10.6). As the harm is less than substantial, the impacts of the development should be considered against the public benefits of the development, in line with paragraph 196 of the NPPF.
46. The conclusions reached within the Heritage Statement, particularly in relation to The Elms and its setting, and to a lesser degree the TCA are optimistic. The approved and subsequent schemes did not receive the approval of Historic England or the District conservation officer. The development has not been a necessary element in preserving the future of any of the nearby historic assets. The permission was granted contrary to supporting text attached to Policy HA4 of the TNP in that development was not restricted to the eastern and south-eastern side of the site. This had been required in order to prevent harm to The Elms listed building, and its setting.
47. With both Historic England and the District’s conservation officer objecting to the approved scheme it is clear that the level of harm was considered to be high. It is therefore essential that further harm is prevented. The simplification of the western elevations of the crescent and eastern flats risk bringing the scheme to the level of the mundane from which even quality materials may not save it. The Heritage Statement maintains that the changes happen away from the sight line of The Elms; this is insufficient. The Elms, the TCA and their setting will still be within sightline of the prominent, changed elevations, most notably when entering the scheme from either Elms Park or from Southern Road. Paragraph 200 of the NPPF directs that only proposals that preserve the elements of the setting of a historic asset that make positive contributions to it (or that better reveal its significance) should be treated favourably.
48. Paragraph 194 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Paragraph 196 states that where a development leads to less than substantial harm (with substantial meaning demolished, or harmed to a level that is equal to demolition) then the harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
49. With an extant permission given under TNP Policy HA4, the use of the land behind The Elms is already secured for its optimum use, i.e., public open space, with mixed accommodation aimed at meeting the housing need identified within the District’s 2012 Core Strategy. The housing with care scheme is not needed to secure the open space and, as has been discussed above, the benefits to the community of Thame are less clear than the delivery of 37 dwellings.

50. **Transport.** The applicant has submitted a Transport Assessment (October 2018). As mentioned above, the vehicle and pedestrian access from Elms Road has been completed. The internal access road is designed to be 5 metres wide to allow larger vehicles to pass one another.
51. It is noted within the Transport Assessment that no parking standard exists for housing with care schemes within either SODC or OCC policy documents or guidance. The level of parking “has therefore been proposed that will meet the operational needs of the site” (paragraph 2.15).
52. The authors have assumed a typical resident as being in their late 70s, with not all owning or needing a car. Of the 65 spaces five will be reserved for staff, and 10 for visitors. The remaining 50 will be leased to some of the householders. The latter will be leased under a claw-back arrangement, to prevent unused leases being wasted. The car parking spaces themselves will have generous maneuvering space around them for ease of use. In paragraph 2.21 the author declares “the above parking strategy will prevent overspill onto the local highway network”.
53. A “minimum” of 2 electric/hybrid pool cars will be provided for the use of residents although no mention is made of any wider charging infrastructure. For cycle parking, it is claimed that provision will be in accordance with local standards; again, it is noted that housing with care does not have an assigned standard.
54. In terms of traffic generation, it is declared there is no comparable data available for housing with care schemes. The author declares that it is best to use sheltered accommodation trip rates as such uses also employ staff on-site and compares these against the trip rate estimates from the approved scheme (Section 3, Transport Assessment). The daily trips generated by sheltered accommodation would be typically lower, with fewer at peak hours.
55. Data is also supplied for retirement flats. It is reasonably argued that these are more likely to be occupied by residents who do not require care and so might not represent such a good match as the sheltered housing model. Like the sheltered scheme, peak trips are lower in number than the approved scheme, although the overall number of daily trips is higher.
56. With a likely younger target audience than those typically entering sheltered accommodation, it is probable that the number of daily trips will be much higher than assumed within the Transport Assessment, but not as high for a retirement flats scheme. It might be reasonable to assume a similar number of trips generated as per the permitted scheme, with the benefit of few peak-time arrival and departures.
57. The statement on bus provision within both the Transport Assessment and Travel Plan again refer to services that have been withdrawn for over 2 years; service 120, and 123. Service 124 is given as an example of one available for use but this is a single, market-day only service run from Watlington via the Oxfordshire Comet community service. It only operates from Chalgrove, to Watlington and Thame, meaning any use from Thame is unlikely.
58. The 5-year Travel Plan that accompanies the application is comprehensive and, weak targets for modal shift aside, is sound in its proposed actions and follow up.
59. One oddity in the Transport Assessment is the statement about Nelson Street in paragraph 2.3, which “is understood to be becoming one-way southbound in future”. This is not within any current plan that could deliver this and to the best of our knowledge, OCC have not initiated any work in this area.
60. **Policy matters.** The application is contrary to the following TNP housing policies:

- TNP Policy H1, allocate land for 775 homes;
- HA4: The Elms – Allocation for no more than 45 residential dwellings;
- H8: Provide affordable housing, in not providing dwellinghouses on a housing allocation site;
- H9: Provide a mix of housing types; and
- H10: Provide a Thame-Specific Affordable Housing and Dwelling Mix Strategy.

61. The cap on numbers that TNP Policy HA4 brings is still appropriate. The cap sought not only to control the physical dimensions of any development but also the type of activities that would occur on site. This would include both within the sensitive setting and townscape of The Elms, and within what would become a public park. HA4 aimed to control not just vehicle movements but also noise, air and light pollution. Policy HA4 was also written with the expectation that the allocation site would be occupied primarily by families, who would embrace the daily “park life”, events and festivals the immediately adjacent Elms Park hosts.

62. The applicants correctly state that the 78 units would count against our housing needs. The units would not, however, count within the current plan period the TNP covers and Thame would have to await both the renewal of the SODC Local Plan and the TNP before it did. Until then we could only count 37 units against our current housing target but this would not prevent other sites being promoted on the strength that the need fulfilled through HA4 has not actually been met.

Recommendation:

63. It is recommended that Thame Town Council objects to this application.