

**Full Council**

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**Date:** **22 September 2020**

**Title:** **Land east of Tythrop Way and south of Kingsey Road**

**Contact Officer:** **Graeme Markland, Neighbourhood Plan Continuity Officer**

**Background**

1. The need for new facilities within Thame for our GP surgeries was recognised in both the Thame Neighbourhood Plan (TNP) and the South Oxfordshire District Core Strategy 2012 (SODCCS, paragraph 11.7). Within the TNP the improvement of healthcare infrastructure is an identified Objective. Policies H7, D1 and CLW4 require contributions from the developers of new housing to help fund additional healthcare facilities. Its provision was rated as a Necessary item of infrastructure within the TNP Delivery Strategy (November 2012) and SODC were identified as the body who would collect financial contributions from the new development towards its provision.
2. In England, GP practices work under contract to NHS England. They are effectively private companies, the practices commission services from other providers. When new facilities at the level of a GP practice are required expansion is normally undertaken without public funds although grants may be available from NHS England via the Local Clinical Commissioning Group. Developers in the area have since 2014 contributed funds towards the improvement of health services to help offset the extra burden brought by new residents. These funds have presumably been kept by the District Council for proper distribution towards an appropriate project.
3. Councillors will recall that the Town Council has undertaken several meetings with the managers of the Rycote and Unity practices, their preferred developer, Montpelier Estates and the promoter of the site, Hallam Land Management, since December 2014. Montpelier are specialists in the development of health centres, care homes and assisted living facilities.
4. The process has been necessarily complicated by Thame's border location and the fact that the Buckinghamshire and Oxfordshire NHS Trusts and CCGs all have an interest in the proposals. This has inevitably led to delays in commencing the planning phase. Recent meetings between the Town Council and the practices / Montpelier have included that in October 2017, when it was formally established that Rycote and Unity were working together on the project, and their preferred location was the land identified within this application. It was agreed at that meeting that it would be sensible for Montpelier to enter into pre-application discussions with SODC. They shared the feedback from the District and County Councils with us in November 2018. This included guidance on matters such as site access and design, and landscape and drainage.
5. In December 2018 a further meeting with the applicants was held. It was commonly felt more guidance could have been given within the pre-application feedback. The applicants, including the practices, all stressed the need to make progress though or risk services valued locally being shifted to other practices or health centres. The Town Council expressed concern over the increasing interest in Thame from the providers of residential care and retirement living / extra care providers. It was agreed that a community public exhibition would help gather in the community's views.

6. David Lock Associates held a public consultation exercise on behalf of the applicants in April 2019. A summary of each unique comment made was shared with the Town Council. There was considerable support for a new health facility, and majority support for the co-location of health, care home and assisted living services. Just over half of all respondents expressed concern over the amount of car parking on offer, and there were less numerous concerns over pedestrian routes and crossing, and the frequency of public transport.
7. At a meeting between the Town Council and the practices / Montpelier on 6 November 2019 a new site plan was shown that included a children's nursery for the first time. It was understood that no commitment could be made by the practices as to what services would be offered by the combined practices on the day any new facility opened. This was due partly to the flexible way in which services are commissioned across the CCG, and partly through ever-advancing improvements in medical science and practice. Furthermore, it was difficult to aim to over-provide space for future expansion of services as the CCGs and NHS Trusts were not committing to an understanding over existing, let alone future requirements.

## **Proposed Development**

8. Application P20/S2593/O is seeking to provide on 2.11 hectares:
  1. a 3 storey health centre containing two GP practices, a dental practice, a pharmacy and other complimentary services
  2. a 3 storey care home of up to 75 bedrooms in number under Use Class C2
  3. a 3 storey building for up to 51 assisted living units under Use Class C2
  4. a 2 storey day nursery for up to 110 pupils
  5. new vehicle and pedestrian access and associated infrastructure.
9. It is intended the site will be served from the Kingsey Road allowing both vehicular and pedestrian access. A pedestrian / cycle entrance will also be provided off Howland Road with a puffin crossing provided on Howland Road.
10. In terms of car parking, 170 car parking spaces are proposed across the site, with each building having its own allocation.

## **Discussion**

11. **Health Centre.** This is a two and three-storey, dual-winged building with flat roofs occupying the north west corner of the site, overlooking the roundabout. It will sit behind a line of established trees identified for protection. The core of the building will be partially illuminated with a large roof light with voids below to the ground floor. The first and second floor will form a pillared canopy over the entrance. The south-western wing will be two-storey in height.
12. The building's exterior is shown finished in a mix of brick and render. Large windows would illuminate the reception, pharmacy and community use areas while the consultation rooms would have smaller windows to ensure privacy. The building is legible in that it should be sufficiently clear that it is neither domestic or business use and its placement in the site means that it will be prominent when viewed from Kingsey and Howland Road/Tythrop Way. This will help visitors locate it.
13. The building offers three reception areas and 35 consulting rooms for the practices spread over three floors. Also proposed are four community rooms for use by social services or

support organisations such as Citizen's Advice. One of these is sizeable and could offer room for meetings or treatment in groups.

14. A dental practice with three treatment rooms is also proposed. For all of the uses there are multiple offices, a pharmacy, store and utility rooms, and staff and training / meeting room facilities. There are fully accessible toilets and changing rooms available on each floor.
15. The building has 95 parking spaces identified for its own use, 6 of which would be for disabled users. A taxi-drop off point is identified on the plans as are two areas of bicycle parking for an unspecified number of bicycles.
16. It is claimed the building lends itself to future expansion, should that prove necessary. It seems likely this would be through the addition of an extra floor on the south-west wing.
17. **Children's nursery.** This flat-roofed building sits at the south-west corner of the site. It is two-storey and has a terrace at first floor level in front of the rooms identified for the care of babies. The ground floor would host older children, toddlers and pre-school.
18. The design is said to have been influenced by children's building blocks. It has led to a proposal for a building with a bold, blocky form with a small but bold colour palette formed by rendered finishes. Linear rectangular windows emphasise the simple forms. The lift shaft mechanism echoes a brick chimney. The entrance canopy is shown to be held up with what seem to be coloured straws/pipewalkers, a feature of many nursery projects. The building's light hearted form will advertise its function.
19. It is notable that the upper floor on the south/south-east elevation is rendered solely in white as though to help reduce its prominence from this direction.
20. Although the size is not declared, there will be green space around the school which can presumably used as a play area, weather-depending. An external staircase leads up to the roof terrace. Some 22 parking spaces are allocated to the nursery, two of which would be disabled users, a taxi-drop off point and bicycle parking area are also shown.
21. **Care home.** Occupying the north-east corner of the site, this approximately "L" shaped building is proposed to have 3 storeys and a ridged roof form. It is intended that it will look domestic in nature, with brick construction, faux chimneys, differing eaves treatments and a mix of slate and clay roof tiles. The shortest range at the south of the building is proposed to be slightly higher than the other two parts of the "L". It is felt that attempts are being made to avoid suggestions of any institutional form in its function.
22. The windows are largely domestic in nature, too, with the exception of those serving the communal areas. Terraces are shown at first and second floor levels, two of which look into the proposed formal garden area which would sit within the "L".
23. The building's 75 residents would benefit from a bar and cafe area. Montpelier, who would run the home, aim to open this area to the general public as part of their "open doors" policy. They claim they wish to encourage the community to join in with any formally arranged quiz nights, music recitals, wine tasting keep-fit and film nights, etc. It is also intended to open the beauty and therapy areas to the public, too, and make space available for local groups to meet.
24. The building's rooms are intended for single occupation by those who would struggle to function in their own homes. Rooms are typically between 17 and 26 sq.m. in area, and

have their own en-suite facility. Each floor has day rooms, some with terraces, and assisted bathrooms. The second floor has a cinema and activity room. The first floor has a hair and beauty salon, a spa, a gym and a quiet room.

25. It is clear that the occupants will be those who require very high levels of care. Paragraph 3.21 of the applicant's Planning Statement declares it will be rare for residents to leave the site due to physical or mental disability. The facilities within would offer extremely good opportunities for enriching the lives of residents as compensation.
26. It is claimed within the Design and Access Statement (p.31) there will be "opportunity" for patients visiting the GP surgeries to be referred for overnight stays, to avoid sending local people to hospital further afield. It is not clear if this is to be on an as-available basis, or if some rooms will be kept for that purpose.
27. The site is identified as having 25 parking spaces dedicated for its use, 2 of which would be for disabled staff or visitors. Two areas of bicycle parking are shown for staff and visitors.
28. **Assisted living.** Councillors will recall assisted living is synonymous with extra care housing.
29. The building is again shown as domestic in appearance but with an exterior of brick and render. The rooves are more staggered, with a mix of slate and clay tiles and the eaves treatment varies across the whole. Certain otherwise blank gables are adorned with faux chimneys while each corridor ends with floor to ceiling height windows. Balconies with fold-back doors are shown for twenty six of the first and second floor dwellings; the others have wide-opening juliet balconies.
30. Most of the flats are two-bedroom units, with only 7 out of the 51 having just one double bedroom. The rest have one double, and one single bedroom. All of the units are demonstrably shown to comply with and slightly exceed national space standards, and properly demonstrate the practical elements of the standards, such as identifiable storage space.
31. The ground floor shows a communal lounge, over 100 sq.m. in area, and an enclosed office. It is not explained who will use the office. The first and second floors each show single activity rooms of just over 29 sq.m. and each has a single assisted bathroom. There are no other facilities apparent, for staff or residents.
32. Some 28 parking spaces are linked to this use, 2 of them for disabled use. An area for bicycle parking is shown near the entrance.
33. **Affordable housing.** The applicant has assumed that affordable housing, in the form of either direct provision, or a financial contribution towards off-site provision, will not be required. This is discussed further under the section headed "Planning matters".
34. **Need.** The site is not allocated for development within any part of the development plan and the use is proposed on an area of open land that has been in very long term agricultural use. There is a need to justify the requirement for these facilities in this location.

35. The proposed health centre is answering a need noted in the current development plan for the area (see paragraph 1, above). The expansion of GP facilities has been recognised as necessary to help meet the needs arising from a population that was expected to grow following the allocation of 775 homes to Thame through the SODCCS. Furthermore, there has been modest natural growth in the villages surrounding Thame that use it as a centre for such services. The nature of primary care has been changing too, with more services (such as ultrasound) being devolved from hospital settings. Health practices have also had to grow in terms of the number of patients they serve in order to remain economically viable.
36. The applicant quotes from research undertaken by the Oxfordshire Clinical Commissioning Group (OCCG), Locality Place Based Primary Care Plan: South East Oxfordshire Locality (January 2018). This is a report that looks only at the provision of practices under the Oxfordshire Clinical Commissioning Group, and so does not cover the Unity Practices in Thame or Chinnor. It does raise the issue that the practices are close to capacity and that housing growth will force investment, and it prioritises care for an ageing population. The applicant quotes a couple of facts from the report, namely that the over 65 population of Thame is 4% higher than in Oxfordshire (it is 2.5% as of 2019) and that 3 of the wards with the highest population of over 65s are in the CCG's South East locality, which is not relevant as Thame is not one of them.
37. The applicant does usefully point to the work the OCCG has committed to in coordinating support within care homes, as part of a proactive care regime and in integrating better with Social Care services. This would of course be simpler to carry out in the care home proposed as part of the co-located development.
38. The nursery use is a need that has been recognised by the Town Council. Local residents and those from surrounding parishes have given anecdotal evidence that there is insufficient childcare available in our area. Residents have been forced to travel to other areas in order to find services, particularly those that will accept childcare vouchers. Some households have struggled and found places at local childminders, normally a more expensive option. The Town Council has received several expressions of interest from individuals or organisations looking for land or buildings in which they can provide or expand pre-school childcare in the past year alone.
39. The case for the need for the care home and assisted living facilities is given within the applicant's Planning Statement. The applicant relies heavily upon work presented by Oxfordshire County Council, the Needs Analysis for Older People in Oxfordshire 2018. Comparisons between Districts or County-level data are not necessarily helpful. For example, as reported by the County's District Data service 21% of Thame's population was aged 65 or over, compared to 18.2% for the County, as indicated by the mid-year 2018 projections published by the Office of National Statistics (ONS). The latter does, of course, include the perennially young, student-inflated population of Oxford, over 50,000 people aged between 18 and 30 alone.
40. The simple projections are a better indicator. In Table 1 of their Statement the applicant repeats a table from the County's report, that predicts an extra 2,500 people over the age of 65 will live in the District between 2016 and 2031. Regrettably, no data is presented for Thame in isolation. This can, however, be extrapolated. With the 65+ population of South Oxfordshire being 29,322 (Source: mid-year estimates 2018, ONS), Thame's over 65 population of 2,575 represents some 8.78% of the District total. When applied to the numeric growth of over 65s up to 2031, as in the County study, that suggests Thame will have only an extra 220 individuals over 65 years of age.

- 41.** It is clear that the above extrapolation is not by any means definitive and does not begin to indicate need. A good proportion of those individuals will live with others in the cohort, for example, as a single household. A smaller proportion will share a household across generations. Many of the households will never want or need the facilities being proposed. It is, however, a better indication for the likely scale of the future requirement for specialist housing for older people in Thame by population projection up to 2031 than that offered by either the applicant or suggested by the report from County.
- 42.** Regardless of attempts to calculate projections of the age of our local population, there will be a need for residential care for some residents from Thame and the local area. We do not have an assessment of need for the particular type of care that would be provided within the care home. We are not, therefore, able to say whether this is appropriate provision, or not.
- 43.** We do, however, have a better indication of the need for the assisted living units. As part of their submission against the most recent planning application at The Elms in Thame, the County Council's Housing and Social Care Commissioning Team wrote "The extra care housing projected to be built in South Oxfordshire by 2031 is in line with the needs of older people according to our population profiling therefore we are not seeking extra care housing proposals at this time. That may change". That response was written on 3 April, 2020. The response to this application from this Team is still awaited.
- 44. Design.** Within their Design and Access Statement (page 18) the applicant states that their layout for the site in terms of the placement of each unit was affected by the pre-application process. The applicant identified what they believed to be the key challenges and opportunities the site offers. The site is open, on the edge of Town, and has no valid design reference nearby. Although near to a reasonable density of housing, the pedestrian and cycle access is not simple. The impact on both landscape and adjacent housing had to be considered.
- 45.** Also shown are what have been identified as opportunities; they are, however, mostly a list of reasons for why the applicant believes the development is needed. The two relevant points relating to the proposed use on this site are the potential good connectivity to the surrounding area and ability to co-locate the buildings due to the availability of space.
- 46.** The applicant notes the feedback from the public consultation event in April 2019. The majority view was that road access off Kingsey Road would be a better option, childcare provision was needed in the Town, and the co-location of services was seen as beneficial.
- 47.** The Design and Access Statement describes how transport, ecology and the form and function of each of the units has driven the final design solution in terms of site layout. Previous schemes had, for example, considered a central square but this would have apparently led to a design that was compromised in ways that have not been specified.
- 48.** Pages 47 and 48 of the Statement discuss the important principle of Secure by Design. This is a long-standing initiative from the Police that looks to encourage best practice in "designing out crime". This can, for example, be achieved by ensuring otherwise vulnerable structures and areas are overlooked by active windows, and buildings are secured with appropriate fittings. It is not declared, though, how the principle will or has been applied to the proposed development.

- 49. Visual Impact.** The TNP identifies the roads approaching the Town, including the Kingsey and Towersey Roads and public rights of way as examples of those offering main local views of the Town. Policies ESDQ22 looks to minimise the visual impact of new development on views from the countryside. This requires a visual impact assessment with the Design and Access Statement explaining how the site layout and forms minimises visual impact.
- 50.** There are no images provided that demonstrate how the buildings will look either individually or as a group in the landscape. The views are currently open, bar the scrub and trees in the north-west corner of the site. An illustrative landscape and biodiversity strategy supplied within the Landscape and Visual Appraisal and the Ecological Impact Statement (parts 2 and 3, respectively) shows a relatively sparse planted boundary to the east of the care home. In comparison, the assisted living complex has a boundary formed by both hedges and trees.
- 51.** Looking at the care home and assisted living buildings, it is probable that their east elevations will appear prominent when viewed from Kingsey Road. The hedge and tree boundary to the assisted living building is likely to lessen the impact of that building. The cluster of buildings is likely to detract from longer views from the bridleway and showground to the north of the site. This is confirmed within the Landscape and Visual Appraisal (see Photoviewpoint EDP3).
- 52.** The impact on the wider landscape from Howland Road will be lessened to some extent by the 2-storey form of the nursery and the west wing of the health centre, and the large car park between which is shown as planted with native tree species. The nursery and assisted living unit would have the main impact on longer views.
- 53.** The development will also be visible from Towersey Road, the allotments, some of the Rugby Club and the more sparsely-hedged sections of the Phoenix Trail. Although around 1km away, those using or living on Windmill Road are likely to be able to see the development, too; the land is quite flat and the two intermediate hedgerows are not significant. Beyond Windmill Road, the development would have an impact on the long view from a short section of the footpath linking to Towersey near the Kingsey Road, although that is approaching a distance of around 1.5km. The overall impact on all of these views is likely to be particularly notable in winter, when lighting is used more and foliage is absent.
- 54.** Local residents to the west of Howland Road and the Tythrop Way roundabout are likely to have their views impacted. The main impact will be from views from upstairs windows although it is likely, even though most houses are bounded by high walls or fences, that some will be able to see the development from their ground floor rooms. This has to some extent been mitigated by the two-storey nature of the nursery and the health centre's west wing, and the placement of the car park between them. Number 1 Fanshawe Road may be the most directly affected property, although it is noted that they have grown a mature evergreen hedgerow on their property's boundary, which may help mitigate the impact.
- 55.** The applicant's Landscape and Visual Appraisal document considers that the harm in terms of impact on the site's landscape character would be as high as a moderate adverse effect in the first year following the development's completion, leading up to a minor adverse effect by year 15 (paragraphs 7.4 – 7.5). The Appraisal continues by explaining that the hedgerow to the east (adjacent to the MP Cricket Academy) is being actively managed to act as a future buffer and that the site is a logical area in which to extend the Town. It is also suggested that the site offers a means to integrate the developed context of the area, by which is meant the rugby club and allotments to the north, and commercial / residential area to the south (paragraphs 7.9 – 7.10).

- 56.** As discussed above, each unit has been designed to a greater or lesser extent advertise its form and function. The care unit and assisted living unit both take on a residential appearance, perhaps to distance them from the function of the institutional health centre and nursery. The result would appear as a significant extension of residential use into the surrounding countryside. It is not considered that references to non-domestic uses such as the rugby club is helpful as such uses are often viewed as being compatible within a landscape whereas major residential uses are not.
- 57. Ecology.** A comprehensive Ecological Impact Assessment has been submitted as part of the proposal. To summarise, the habitat value is considered to be of at most local importance only, mostly site-level, with no impact on protected or notable species and no wider impact on other areas of conservation value (such as the Cuttlebrook Nature Reserve and Ham Wood).
- 58.** The report was written using desktop assessment and following visits by an experienced surveyor using an approved methodology. Visits were made in 2018 and repeated due to the passage of time in June 2020, primarily to ensure that species (such as badgers) that can quickly establish themselves in an area were not missed. It has been recommended that the mix of oak, hornbeam and maple trees facing onto the Tythrop Way / Kingsey Road roundabout be retained, after thinning and management, as these have the greatest value. The loss of hedgerow on Kingsey Road needed to form a vehicular entrance to the site is judged tolerable too, given that it is currently a shrub-like, flail-cut hedge.
- 59.** It was felt by the author that the main impact would be on the loss of habitat for breeding birds, given the mix of farmland / woodland / scrub and hedgerow habitats in and near the site, although there would be some loss of opportunity for foraging bats. Badgers were recorded as being active within the site, with a sett found at the south-east of the woody area. Small populations of grass snakes, hedgehogs and common toads are suspected by the recording of single observations or records from other surveys.
- 60.** New on-site hedgerow and tree planting and bird/bat boxes aside, it is proposed to offset harm caused by the proposed development by planting 1.2 ha of native broad-leaved woodland on what is currently arable land some 800 metres from the sites' boundary. This would be adjacent to a water course, a large pond and established broad-leaved woodland. It is recommended that this is conditioned, and a woodland creation and management plan be agreed and committed to. It is believed this will result in a net gain of habitats for birds, bats and reptiles. The result is predicted to be a modest gain in biodiversity, but a considerable gain in linear habitat, presumably much of this from the woodland edge. It is also proposed that any lighting scheme for the site is designed to be friendly to foraging bats to prevent them from being deterred. Finally, a full assessment for further badger setts will be made as the site is cleared. Any found in addition to that already identified will be closed under the control of a licenced ecologist at a suitable time of year.
- 61.** A methodology to minimise the risk to the small reptiles and mammals during construction on site is contained within the report.
- 62. Flood risk.** The site is identified as being in the lowest risk category for river flooding. It is proposed that surface water run-off rates should be diverted to the already existing ditch network (with those currently crossing the site moved) at greenfield land rates, while allowing for a 100-year, plus 40% climate change storm. This is likely to involve an amount of water storage to be planned for, on-site. A Sustainable Drainage Statement has been

submitted alongside the application to explore how this is likely to be undertaken. This notes concern from Thames Water about the local network's ability to handle the foul water (sewage) from the proposed development. Thames Water have committed to establish what would be required and to undertake appropriate works should permission be granted.

- 63. Traffic and transport.** As touched upon before, it is intended that vehicle and pedestrian access will be formed off Kingsey Road. The Kingsey Road would have to be widened to allow a "ghost island" turning into the site approximately 150 metres north-east of the roundabout with Tythrop Way. It is proposed the 40mph speed limit area be extended further eastwards down Kingsey Road.
- 64.** Further pedestrian access would be taken off Howland Road into the site. A puffin crossing will be provided with the aim of encouraging pedestrian traffic via Fanshawe Road. It is claimed 2 metre-wide footpaths will be provided, including into Fanshawe Road itself.
- 65.** The applicant has submitted a Transport Assessment (June 2020). The Assessment starts with a review of national and development plan policy. The author records what they believe to be the relevant transport-related objectives from the TNP, namely the aim to improve existing pedestrian and cycle connections within Thame, to improve connections to surrounding destinations and to plan public transport to better meet users' needs. They do not, however, refer to the associated policies GA2 and GA3.
- 66.** The key matters are highway safety for all users, and impact on the existing road network. The Assessment declares that County records on injuries from collisions were assessed for a five-year period up to December 2018. Figure 4.2 of the Assessment shows this covered the entire Tythrop Way / Howland Road / East Street and the road spurs leading onto each of the junctions with those roads. It is declared that the forecast traffic generated by the development would not lead to material changes in peak hour traffic volume. The author believes there would not be any adverse impact on road safety.
- 67.** The baseline traffic count surveys that underpin other matters within the report were made during "normal" traffic conditions in April 2019 for a range of junctions identified by the County Council. The counts were then used within traffic modelling software to test the performance and saturation (breaking point) of the identified key junctions.
- 68.** A site accessibility audit was also undertaken looking at the destinations available within practical walking and cycling distances of the site, taken as 2km for walking, and 5km for cycling (Figures 4.4 and 4.5 of the Assessment). Although the analysis uses the footpath, road and bridleway network, an incorrect assumption was made for the 5km distance, namely identifying the Stockgrove cross-country footpath as capable of being bicycled. The whole of Thame does fit within the 5km cycling distance, and much of the Town within the 2km walking distance. The bus services that could be used by staff and visitors were also correctly identified, and their service frequency.
- 69.** Other matters covered within the Assessment include the likely trips at peak time for each of the four proposed uses on the site could generate. These assumptions are based on recorded arrivals and departures at similar developments elsewhere in the Country. This was correctly made with an assumption that each unit would function independently e.g., there would be no car sharing) and before the introduction of an independent or site-wide Travel Plan. This represents the worst case for what the site could yield. One reasonable assumption that the author makes is that the trips to the health centre and nursery would be re-direction of existing trips but again, this was not built into the model.

70. The traffic model was then run again, assuming “business as usual” background traffic growth projected up to 2024. The likely traffic trips generated by all 4 uses was then applied on top.
71. The County Council’s Highways Team has provided a response to the Transport Assessment. Greater information is requested for many items, such as whether a 2 metre footway can be accommodated on highway land where shown.
72. Some key matters noted by County include:
- the trip generation data provided for the uses has been tested and is robust
  - there will be an impact on the local highway network at the key junctions but is not severe, around 10 seconds delay per junction
  - the applicant needs to confirm the proposed puffin crossing is suitable for the location
  - northbound and southbound bus stops will need to be provided on Howland Road as the 40 service travels both ways, and future service expansion may occur
  - contributions will be sought for improvements to local bus services. To calculate these total daily trip data will be sought, not just peak time data
  - bicycle parking to County standards will need to be demonstrated
  - full details of the number of vehicle and car parking spaces to be provided is required (worker / visitor split, etc.)
  - the internal layout of the site needs to be altered to provide more direct pedestrian routing, to avoid pedestrians crossing car park areas
  - full travel plans for each use are required.
73. It is notable that no mention has been made of electric vehicle charging points being made available on-site. No secure storage areas for mobility scooters have been identified either, which is an odd omission given the intended occupants of the assisted living housing.
74. Particular reference is made in the TNP to improve the pedestrian crossing at the Howland Road / Tythrop Way / Kingsey Road junction under Policy GA2, but improvements do not seem to have been raised within the Assessment.
75. **Employment.** Within the Planning Statement it is stated the proposed development would yield up to 179 full time equivalent jobs (fte) comprising:
- assisted living – 20 – 25 fte
  - care home – 80 fte
  - health centre – 54 fte
  - children’s nursery – 20 fte.
76. The planning application gives a more conservative number, 140 fte jobs. It should be remembered that the majority of those arising at the health centre will not necessarily be new ones, although a required expansion of services and staff is a key part of the recognised need for the facility.
77. **Planning matters.** The applicant states their development consists of only D1 Use Class uses (non-residential institutions) and C2 (residential institutions, in this case for those in need of care). This does appear to be correct in terms of the intended use of the building.
78. Although having no special protection for either role, the development site is currently open, greenfield land with both visual amenity and biodiversity value. Although neither is

considered of high value, identifiable harm would still occur should the development proceed.

79. The need for new health facilities is recognised by the Town Council and is recorded within the TNP. Although no formal statement has been made regarding the provision of pre-school places, the perceived need has been identified and reported by the public, businesses and Members alike, and noted in Council meetings. It is believed the benefits of their provision would outweigh the harm to the site's setting in the landscape, and the associated loss of habitat and short-term impact on biodiversity.
80. There is no identified allocation for elderly peoples' housing identified within the currently adopted Development Plan. The Town Council does not receive notice of need from the public, or service providers, only from developers. The National Planning Policy Framework and associated guidance would in this case guide the decision maker under these circumstances towards the presumption in favour of sustainable development outlined in Paragraph 11.
81. For the proposed care home, the Town Council does not have any information about local need for residential care of the type that would be provided. This is very high-end care, for those with considerable physical or mental disabilities. The three-storey unit will, however, be quite prominent in the landscape. Its proposed form would introduce a domestic form of architecture within an area of open countryside on the edge of the Town that currently has none. The building will appear as contemporary flats, or even town houses. The Design and Access Statement declares that the materials chosen for the buildings have taken their design lead from Thame's Town Centre, while the scale reflects that of the industrial buildings off Howland Road, over 500 metres south.
82. The same comments have been applied to the assisted living unit. In addition though, the form of the building's units brings an issue that has recently been aired in Thame. Each unit is self-contained, and is therefore very likely to be viewed by the District Council as a dwelling. This would be regardless of the planning unit's intended use as a C2 residential care home. Members will recall a very similar situation arising at The Elms, Thame, planning application P18/S3595/FUL, proposed development for 76 units of C2 use. The Town Council believed they were dwellings, being self-contained units whose residents would not need to use the facilities proposed on-site; the District, residential care units, eligible for affordable housing contributions.
83. Once refused permission, the scheme was appealed and the Inspector found that each unit was in C2 use but was also a dwelling, and again refused permission in September 2019. A subsequent legal challenge was dismissed on all grounds in July 2020. This is now the most recent authority on this matter. It is raised within this report partly because if the District were able to call for either on-site affordable housing, or a contribution towards off-site provision, it would become a material matter in the District deciding the benefits of this application.
84. The application at The Elms clarified that C2 uses, if self-contained, are dwellings. This is significant as Policy CSTHA1 of the SODCCS states that within Thame, "...housing on suitable infill and redevelopment sites" will be permitted. The scheme has dwellings, is therefore housing, but is neither infill or a redevelopment. The proposed scheme would, therefore, be contrary to Policy CSTHA1.
85. It is stated that up to 25 fte jobs' worth of people could be employed in the assisted living scheme, yet there is a lack of staff facilities such as changing rooms, showers and rest rooms. This is an anomaly, given the roles the staff would be expected to carry out (such

as helping wash, or toilet individuals). There is an equivalent paucity of facilities for the residents. It is possible the District will consider the use of the building, as shown, to be normal dwellings.

**86.** The proposal is contrary to the following policies:

- CSTHA1, in seeking to introduce housing other than an allocation, infill or redevelopment location
- Policy H8 of the TNP, in failing to provide affordable housing
- Policy H9 of the TNP, in failing to provide a mix of housing types on a relevant scheme
- Policy ESDQ 16 in that the care home and assisted living buildings do not relate well to the site and their surroundings
- Policy ESDQ 22 of the TNP, in failing to minimise the impact of the whole proposal in the landscape and in not explaining the approach taken within the Design and Access Statement

**87.** There is also no proven need for the assisted living that outweighs the last known position of the County Council's Housing and Social Care Commissioning Team.

**Recommendation:**

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