

## Full Council

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<b>Date:</b>	<b>27 April 2021</b>
<b>Title:</b>	<b>Reserve Site C</b>
<b>Contact Officer:</b>	<b>Graeme Markland, Neighbourhood Plan Continuity Officer</b>

### Background

1. Thame Neighbourhood Plan (TNP) was made in July 2013. It allocated housing land for the 775 homes identified for Thame within the District Council's 2012 Core Strategy. One key allocation was the use of the Lord Williams's Lower School site for 135 homes which was dependent upon the school moved to the Upper School site off Oxford Road.
2. It was recognised that the allocation, although sound, might not be able to be brought about due to matters outside of the school's control. To ensure that the District's housing need was delivered, Policy H2 of the TNP ensured that if the Lower School Site had not had planning permission secured upon it by 1 April 2021, two reserve sites identified within the TNP would be released to provide suitable land.
3. In August 2019 the Town Council learnt that it would not be possible to move the school as Oxfordshire County Council, who own the Lower School site, were not able to fully back the scheme. It was recognised that without a willing land owner, there was no hope of the site coming forward within the required timeframe and so the reserve sites were automatically released for use in line with TNP Policy H2.

### Proposed Development

4. This application is seeking outline planning permission with all matters reserved, other than access, for housing and publicly accessible open space. The site is 5.86 ha in area.
5. It is proposed that there would be 57 dwellings, 22 of which would be affordable. The indicative mix given within the planning statement is for a range of 2 – 4 bedroom units of differing types.
6. Some 2.7 ha of publicly accessible open space is also proposed, arranged around and within the development itself and south of an area of 1.18 ha retained for agricultural use. It is proposed that access across this agricultural area be provided via defined footpaths.
7. Vehicle access for the proposed housing, open space and remaining agricultural land would be made from Hode Garth in the adjacent Hampden Gardens development.

### Discussion

#### Principle of development

8. As covered in the background above, the site is allocated in the TNP for up to 57 dwellings and 2.7 ha of landscaped publicly accessible open space through Policies H1, HA7 and Figure HA14.
9. Other matters raised within Policy HA7 include the need for a green corridor along the site's western boundary, adjacent to Site C, and for the whole scheme to be planned holistically

alongside Sites C and D through a Design Brief. The Design Brief was to include certain principles (TNP Policy HA7 page 71):

- linking the southern open space provided through the development of Site C to Wenman Road with a wide green 'corridor' to enhance biodiversity and create a high quality environment
- designing a positive frontage to Wenman Road where dwellings overlook the road but - at the same time - are provided with some 'breathing space' to the employment buildings opposite. This 'breathing space' must be designed as an extension of the space provided as part of the development of Site C
- ensuring that the overall approach to built form, street layout and landscape and dwelling density minimises the visual impact of the development. Buildings must not exceed 2 storeys, except along the Wenman Road frontage where up to 3 storeys may be acceptable subject to detailed visual impact assessment.

10. The applicant is relying on the need for the proposed housing on this site through its link to policies within the TNP that are some 8 years old, and it is sensible to question the currency of this assumption. In terms of what has changed locally, the adoption of the District's Local Plan 2035 (LP 2035) has meant Thame has a new headline housing allocation need for some 339 homes. It should be recognised that the existing housing allocation and windfall sites across Thame were incorporated into the housing supply evidence presented by the District for the purpose of the examination in public of their Local Plan. This includes homes that have been completed, are under construction, are allocated or have sound planning applications that are capable of delivery. Policy H3 of the LP 2035 explains the 339-home figure is formed from the housing requirement for Thame of at least 1,518 homes, which itself results from incorporating the 2012 Core Strategy allocation of 775 homes with growth of another 15% of housing stock from 2011 (an extra 743 extra homes). The completions, site allocations and permissions since 2012 are subtracted from the 1,518 requirement to give the 339 figure.
11. The inclusion of existing TNP allocations and windfall permissions was found to be sound at examination and Policy H3 of the LP 2035 and the Plan itself adopted on the basis of it. Lord Williams's Lower School and the two reserve sites are specifically mentioned within the evidence documents. The original Core Strategy-led allocations within the TNP have therefore been recently tested and reaffirmed through the examination and adoption of the LP 2035.
12. The principle of development should, therefore, be considered acceptable if the TNP principles and other relevant policies have been met.

### **Access**

13. The applicant has provided information on how the site will be accessed by vehicles, pedestrians and bicyclists. Details are spread between the Transport Statement, Travel plan Statement and the Design and Access Statement (all February 2021).
14. It is proposed to take vehicle access from the existing junction with Wenman Road and Warren Mead, with vehicles crossing over into the reserve site via Hode Garth. This access would be in conformity with the TNP as show within Figure HA14.
15. Questions have been raised through the public response to this application regarding the use of the existing highway for the volume and type of traffic that will be serving it. The proposed highways match in terms of physical characteristics those in Hode Garth and Warren Mead and those serving the much larger developments at Site D (Sycamore Rise)

and Site F (Thame Meadows). The retained agricultural land will require servicing by farm vehicles, and it has been similarly argued by residents of Site C that this is unsuitable. The area of retained agricultural land will naturally be reduced, meaning there will be a modest reduction in journeys through the estate, especially during peak times in the agricultural year. Questions arise however over the access to the western area of Site C, beneath Hampden Gardens; there seems to be no means for heavy agricultural equipment to access the area, other than over the footpath along the eastern boundary of the open space.

16. The Town Council has informally discussed the principle of accessing the site for the purposes of construction only near to or through the existing agricultural entrance onto Wenman Road. It is not known if this could be safely managed and would be subject to input from the County's Highways Development Control Team.
17. For cyclists and pedestrians, it is proposed that there will be a landscaped frontage with a cycle / pedestrian path set back from the Wenman Road frontage in line with and connecting to that already in place on Site C's frontage. Pedestrian / cycle access is provided through two main links within the north east and north west "corners" of the site from Wenman Road and two separated links to Site C to the west.
18. Within the site itself, it is proposed that there will be a footpath running from Wenman Road on the eastern and western flanks for pedestrian connection to the publicly accessible land in the south. The roads will likely be designated as 30mph routes, but the applicant claims within their Design and Access Statement that they have designed the roads to deliver slower real-world speeds. As such, it is intended that cyclists will be encouraged to access the wider road or cycle path network using the internal road network. Smaller access roads to small clusters of properties are proposed as shared surfaces in a similar manner to those within the Hampden Gardens and Thame Park estates.
19. A main route for pedestrians will be the central corridor which will straddle the protected route of the pipeline. It is proposed to split the vehicle / pedestrian route with part of it to the north and part to the south of the pipeline which will presumably help in reducing vehicle speeds.
20. Within the Design and Access Statement it is stated that County vehicle parking standards will be met. No commitment is made to the standard for bicycle parking; this may require input from County, first.
21. The County's Highway Development Control Team has submitted a response and have given general advice on matters such as bicycle parking standards, suitable planning conditions and improved internal pedestrian connectivity. In addition, they have requested that further details are supplied as to the nature of the junction with the new road and Hode Garth, which looks to be a crossroads, but the applicant refers to as a "T" junction. They also seek further details of pedestrian and cycle access and swept path diagrams proving access across all of the proposed roads for an 11.6 metre refuse vehicle. The Team has not raised any particular concern regarding the proposed scheme, or the access through the estate by agricultural vehicles, but they have requested a Stage 1 Road Safety Audit for the site's access at Hode Garth.
22. The Team has also covered the matter of available bus routes. As Members will be aware, the 280 service was extended to Wenman Road through the use of S106 funds raised from the Site C and D estates. It is claimed the service and patronage is too weak to be sufficiently attractive for residents. The 40, High Wycombe service is described similarly, with the lack of suitable bus stops in the immediate area limiting its use. The Team has requested that the applicant investigates the possibility of adding bus stops (with footpath extension where necessary) on both Howland and Chinnor Roads to improve access to these services and thus improve access to Thame Town Centre for local residents.

23. The Highways Team agrees that the trip generation data proposed by the applicant is acceptable. This claims the 57 dwellings will generate 31 peak hour morning movements (between 08:00 and 09:00) and 34 in the evening peak (17:00 – 18:00). The impact on the surrounding network is judged to be negligible.
24. The access onto Wenman Road from Warren Mead was modelled in its entirety as part of the Outline permission for the entire Site C, with a base date for traffic levels of 2019 used to coincide with the expected completion date for the development. Although the modelling does not appear to have included the extra vehicle movements arising from the Reserve site, the County's Team have explained the impact against the modelled results within their response.
25. Junction capacity is modelled against expected traffic flow and presented as a ratio to flow capacity (RFC). A figure of 1.00 indicates the junction is working to its design capacity and numbers over 1.00, in excess of it. Based on the model for Site C, the Warren Mead / Wenman Road junction was predicted to be working at 0.07 for the morning peak and at 0.04 for the evening peak. The County's Team have concluded that there is sufficient capacity to cater for the extra vehicle movements and overall, there is no reason to refuse the proposed development based on the impact of the development on highways.
26. It has been proposed by the applicant that the site is incorporated into the existing Travel Plan for Site C, which the County Team finds acceptable.

## Housing

27. There are no details provided for the proposed housing types or mix other than a statement that 22.8 affordable housing units would be provided with only 0.8 of those being in the form of an off-site contribution. The Design and Access Statement does comment on suggested design principles and parameters and these are discussed in the relevant section, below.
28. The District's Affordable Housing Development Team have responded to this, stating that Policy H9 of the LP 2035 now applies. This will require 9 of the 22 affordable homes to be provided for affordable rent, 8 for social rent and 5 for "other" low-cost home ownership. Advice is given on a suggested mix, with preference for 2+bedroom properties and for these to be provided as houses rather than flats.

## Open space and biodiversity

29. The applicant states that 2.7 ha of publicly accessible open space, including a play area, will be provided in line with Policy HA7 and Figure HA14 of the TNP. Within the submitted Design and Access Statement, it is claimed that this will be comprised of:
- 0.75 ha public open space within the residential area, which includes the pipeline protection area
  - 1.18 ha of agricultural land "with controlled public access" via defined footpaths
  - 1.56 ha of publicly accessible natural green space along the Cuttlebrook, connected to the existing provision at Site C.
30. The applicant has stated that this gives some 3.5 ha of public open space. A simple addition of the two areas of public open space / publicly accessible open space gives 2.31 ha. It is not clear how the 1.18 ha will function in order to meet the required 2.7 ha.

31. The TNP calls for a green corridor on the site's western flank to link to the open space behind the development. The provided plan suggests it is intended to provide one on the eastern boundary, too. The pipeline protection area provides a further green corridor through the middle of the site.
32. The District's Landscape Officer has requested a holding objection subject to recommended changes. The proposals for tree planting on the eastern boundary are welcomed, to help soften wider views from the east. Recommendations include habitat improvements such as planting boundary areas with wildflower grassland and thickening existing hedgerows with native species. The officer questions the retention of a relatively small amount of agricultural land and notes it should be landscaped publicly accessible open space, in line with TNP Policy HA7 and Figure HA14.
33. The Landscape Officer also recommends revising the plans to show appropriate open space that will allow for formal and casual play, while still allowing for buffer zones and surveillance. It is also felt that the plans should show all elements such as services, easements, lighting etc. to ensure sufficient open space is left for the proposed planting and biodiversity mitigation / improvements.
34. An Arboricultural Assessment (February 2021), Ecological Appraisal (January 2021) and Biodiversity Net Gain Assessment (February 2021) have been submitted. No trees need to be removed to permit the development. The Arboricultural Assessment states that tree planting will be extensive within the publicly accessible green space and within the development itself. The Ecological Appraisal notes a series of surveys for habitats and specifically for bats, badgers, water voles, reptiles and birds, carried out in either 2015 or 2020. The report lays out recommendations for further survey, makes recommendations to prevent harm during and post-construction, and suggests means of improving existing habitats such as installing roosting and nest boxes for bats and breeding birds.
35. The Biodiversity Net Gain Assessment aims to demonstrate there will be a positive gain in biodiversity as a result of the development. It notes a relatively high gain in net biodiversity, some 56% overall. This is managed through increasing available habitats and significantly increasing hedgerow cover. Methods recommended include:
- using a species-rich flowering lawn mix on areas around the dwellings
  - sowing hay mix within the publicly accessible open space in the south of the site
  - engineering the SUDS basin to ensure a permanently boggy substrate
  - underplanting hedgerows and replanting gaps; underplanting tall sections with native shrubs and ground cover, and allowing some tall tree growth.
36. The District's Forestry Officer does not object to the scheme and only seeks conditions to protect the existing trees and hedges during the development phase. The Countryside Officer has commented on the Ecological Appraisal and Biodiversity Assessment and having received further information, believes a more conservative calculation gives a net gain nearer to 20%, not 56%. This does still represent a sound net gain and he will be recommending approval subject to conditions that ensure the gain is both achieved and maintained.

## Design

37. In keeping with the outline status of the application, no details have been given for the dwellings in terms of type, mix, style or materials. The division of the scheme into 4 relatively small blocks reflects both the site's constraint forced by the pipeline protection area and the adjacent development. This division will help with active travel through and within the site, especially if the County's recommendations for additional internal pedestrian links are supported.

38. Within the Design and Access Statement it is proposed that the site will be subdivided for the purpose of built development into a northern frontage, southern area and the rest of the site.
39. The frontage is proposed to have a variety of building forms, set back from Wenman Road with buildings of 25 – 35 dwellings per hectare (dph) “up to” 13 metres in height. The southern edge would be developed at a lower density, 10 – 20 dph, with buildings of maximum 10 metres in height. This is intended to introduce a more relaxed, rural form. The rest of the site will provide for development of a similar height at a density of 20 – 30 dph.
40. It is noted that the immediately adjacent Site C development has buildings fronting Wenman Road of no more than 9 metres in height and the more distant Thame Park development is fronted with dwellings of a similar scale. The District’s Landscape Officer has queried if the proposed, up to 13 metre-high 3 storey development is now considered appropriate. This design detail is specific to this location, and therefore HA7 would have greater weight over other policies; however, the policy states that “3 storeys may be acceptable subject to detailed visual impact assessment”. This would be required at detailed planning stage.
41. It is intended that the central green corridor provides a focal point for the development and most of the dwellings positively address this internal frontage. The Statement also suggests that the improved eastern planted edge will help screen the development from Chinnor Road with the exception of “occasional views”. The development is unlikely to be visible from Thame Park Road due to the existing topography and built development. The frontage is intended to reflect the adjacent Site C development and provide the positive frontage and “breathing space” required by Policy HA7.

### Other key matters

42. **Air quality** (arising from scheme). The submitted Air Quality Note (February 2021) has been appraised by the District’s Air Quality officer. The officer notes the scheme has only noted its own emissions and has not taken into account those from the completed, neighbouring development. A set of conditions are advised to ensure the impact does not give rise to air quality issues in the local area.
43. **Heritage and archaeology**. As suggested by the provisional layout and parameters, there are no registered historic buildings or structures that could be harmed, or have their setting harmed, by the scale of development proposed. Given initial work undertaken prior to the development of Site C, the County’s Archaeologist does not expect there to be any archaeological features underlying the site.
44. **Noise**. The District’s Environmental Team is concerned that the submitted Noise Assessment Report (February 2021) only covers road noise, and not the industrial buildings opposite the Wenman Road frontage. They have requested further noise assessments that take this into account. The Assessment itself declares that the proposed build method (brick, plus standard double-glazing) will be sufficient to mitigate the noise from the road. It is noted that the immediately adjacent scheme required triple glazing and specific ventilation solutions to achieve a similar level of mitigation on the Wenman Road frontages.
45. **Flooding and drainage**. The applicant’s Flood Risk Assessment identifies the proposed built development site as being at low risk of river flooding. There are, however, two narrow areas at low risk of surface water flooding crossing the developed site. The District’s Flood Risk Engineer is not concerned about these and only requires that proof be given that the SUDS (attenuation) basin will be wholly located in Flood Zone 1 (the area identified as having a low risk of river / surface water flooding).

## Policy matters – Thame Neighbourhood Plan

46. **Policies H7: Provide new facilities; HA7: Reserve Site C; ESDQ2: Allocated sites to provide open space in locations specified in Section 3.** The site, like the rest of Site C, borders grounds of Thame Park, which contains the Grade I Thame Park House and Grade II\* listed Park and Garden (and separately listed elements). This, plus the need to soften the hard-edge of the industrial Wenman Road area, and to provide a semi-rural edge to the Town are the reasons why the TNP sought a combined Design Brief for the combined area of Sites C and D through Policies HA2 and HA3 and the policy that covers this site, HA7.
47. As noted within their Planning Statement (February 2021), the Brief, prepared alongside application, P13/S2330/O, included the Reserve Site within a comprehensive masterplan for the three sites. This part of Policy HA7 has been complied with.
48. As for the other matters within HA7, the majority are met. It is not clear, however, how the full requirement for 2.7 ha of publicly accessible open space will be provided. This must be clarified before TNP Policies H7, ESDQ2 and site-specific HA7 can be considered complied with.
49. **Policy H4: Integrate allocated sites; GA1: New development to provide good pedestrian and cycle connections to the town centre and other local destinations; and GA2: Include a strategy for improving pedestrian and cycle connections.** The proposed development demonstrates the principle for connecting the development for both active and motorised travel purposes to the wider town (and adjacent development). If all opportunities are taken to maximise internal pedestrian connectivity, as per the County's recommendation, then Policies H4, GA1 and GA2 could be considered complied with.
50. **Policy H6: Design new development to be of high quality.** This is linked to the specific allocation. As far as the submitted detail allows, the principles of Policy HA7 and Figure HA14 have been complied with. This will be revisited in light of any amendments or detailed submissions.
51. **Policy H9: provide a mix of housing types** has been met. A provisional housing mix has been suggested by the District Council in accordance with LP 2035 Policy H9. This would be likely to also satisfy Policy H10: Provide a Thame-specific affordable housing and dwelling mix strategy.
52. **ESDQ9: Sites C, D and F to provide riverside walks within natural green space.** The proposal is compliant with this policy.
53. **ESDQ15: Developers must demonstrate in a Design and Access Statement how their proposed development reinforces Thame's character.** As far as the submitted detail allows, this policy is considered complied with.
54. **ESDQ16: Development must relate well to its site and its surroundings.** In following the site-specific requirements and principles within the TNP the development is likely to end up relating well to its neighbouring development to the south of Wenman Road. This, plus relevant policies covering character such as ESDQ17 and ESDQ18 will be used to judge more detailed submissions.
55. **ESDQ21: Development proposal, particularly where sited on the edge of Thame or adjoining Cuttle Brook, must maintain visual connections with the countryside.** The purpose of this policy is to ensure long views into the countryside (and, arguably back into

Thame) from existing routes. The eastern and western boundaries provide such long views from Wenman Road.

56. **ESDQ22: The visual impact of new development on views from the countryside must be minimised.** If the eastern boundary is reinforced as proposed, then the visual impact from the east will be minimised. It is unlikely that there will be a negative visual impact from other directions, including the high ground within Thame Park to the south.
57. **ESDQ23: Streets within new development must be designed as pleasant places to be and ESDQ24: Pedestrian and cycle routes must link together potential destinations, such as new housing and the town centre.** The proposal does largely adhere to principles raised within Policy ESDQ23. Pedestrian and cycle routes among the housing follow roads; quieter streets have shared surfaces; building frontages address streets; the roads appear designed to keep vehicle speeds low. More formal pedestrian pathways along expected desire lines should be provided to achieve full compliance with this policy.
58. Regarding Policy ESDQ24, the proposed paths and bicycle route along Wenman Road do link to the existing footpath / bicycle network and then onwards to the Town Centre. The close proximity to the Phoenix Trail also allows for onward movement to other employment opportunities, schools and leisure facilities.

### Policy matters – Local Plan 2035

59. There are some key policies that have a material bearing on this application and that can be evaluated against the evidence provided.
60. **Policy TH1: The Strategy for Thame.** It is expected that Thame's NDP will deliver homes in accordance with market town housing Policy H3. The latter requires at least 1,518 homes to be delivered in Thame across the Plan period. This proposal, utilising an allocation site within the TNP, is in conformity with these LP 2035 policies.
61. **Policy ENV3: Biodiversity.** The proposal is in conformity as it aims to conserve and enhance biodiversity in order to achieve a net gain, supported by an accepted biodiversity metric.
62. **Policies STRAT5: Residential Densities and DES7: Efficient Use of Resources** are both concerned with using land efficiently. STRAT5 clause 3 would require a minimum net density of 45 dph in Thame, except where there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density. Paragraph 3.54 of the supporting text for this policy states that while density will be optimised, the design of a site will need to pay careful attention to the existing character of a local area and any local circumstances.
63. DES7 1. i) promotes densities in accordance with STRAT5. Higher quality and higher density development that minimises land use is encouraged. Supporting text paragraph 8.25 states that through Policy DES7, all development will be expected to use land efficiently, with a density and form appropriate to the site and its surroundings, taking into account local character and accessibility to services and facilities.
64. The allocations for Site C and D were particularly designed to conceal the sudden industrial, southern edge to Thame and reintroduce a more rural, market-town feel. The means of doing this was through careful control of development, including densities. Although the sites have achieved and looked for a low overall net density, this has been to allow transition from a relatively higher density to a lower one to introduce the desired rural edge to main routes into Town, and across longer view lines. This has been a key principle of the southern



estates and has led to a high-quality environment more in keeping with landscape concerns raised during TNP consultations and evidence gathering.

65. With site C established, any increase in density on Reserve Site C would be likely to cause harm; the contrast would be very visible, with no historic or natural feature to account for the difference. It is believed that through the allocation policies of the TNP remain material and together with the need respect the existing character of the area, the proposed development is in conformity with the principles of STRAT5 and DES7.

### **Summary**

66. This outline application is largely in compliance with the site-specific policy from the TNP, Policy HA7. Doubts exist, however, as to compliance with the requirement to provide 2.7 ha of publicly accessible open space. The proposed noise mitigation for the residents fronting Wenman Road does not appear to be of the standard provided at the adjacent Site C. The reinforcement of the eastern boundary, particularly with the encouragement of major tree growth, will be required to meet TNP Policy ESDQ22. Finally, the concerns of District officers regarding the attenuation solution for run-off and the suggested improvements to the internal footpath network should be noted.

### **Recommendation:**

67. It is suggested that Thame Town Council supports this application, subject to a satisfactory provision of 2.7 ha of publicly accessible open space. Members may wish to consider submitting comments emphasising the importance of the eastern boundary treatment, the anomaly with the proposed noise mitigation for Wenman Road properties and the suggested improvements to the footpath network.