



GM/LF

Mr William Sparling  
Planning Department  
South Oxfordshire District Council  
135 Eastern Avenue  
Milton Park  
Milton  
OX14 4SB

9 June 2021

Dear Mr Sparling

Planning Application Reference: P20/S4801/RM (as amended):

*Reserved Matters application following outline approval and subsequent Section 73 application P20/S1852/FUL for approval of appearance, landscaping, layout and scale. Application under S73 of the Town and County Planning Act 1990 for variation of Condition 2 - amended plans and 5 - amendment to means of access for the full application and Condition 4 - amended plans for the outline application of P18/S3143/O. "Hybrid planning application with: Outline permission (all matters reserved except for access) sought for demolition of existing buildings and development of 1511 sqm (gross) of offices within Class B1 and up to 129 dwellings within Class C3 and associated works. Full planning permission sought for erection of a 68 bed care home within Class C2 and associated access, vehicular parking, landscaping, ancillary infrastructure and other works (As amended by plans and information received 19 May 2021).*

The original application was considered by Thame Town Council at a meeting of its Full Council on 9 February 2021. Due to the Committee cycles, etc. the Town Council's Neighbourhood Plan Continuity Officer is providing a delegated response to the proposed amendments, based on the principles established through the Town Council's earlier response.

The Town Council continues to **object** to this application, on reduced grounds. More detail is provided below:

- It is contrary to the following Local Plan Policies:
  - STRAT5 in not meeting minimum density requirements
  - LP CF5 in providing inadequate open space
  - TRANS5 in failing to support the take up of low emission vehicles
- The application is also contrary to the following design policies:
  - Local Plan DES2, Thame Neighbourhood Plan (TNP) ESDQ15 and ESDQ16 in failing to both reflect local character and adequately explain the overall design approach

1. **Housing density.** The proposal would deliver housing at approximately 41.6 dwellings per hectare (net). Local Plan Policy STRAT5 seeks more than 45 dwellings per hectare, unless there are design conflicts or other justifiable planning reasons for a lower density. No reason has been given within the application pack, or the amendments for the

proposed lower density rate. It is recognised that the shortfall is only around 3 dwellings per hectare, but given the proposed boundary screening, mitigation and neighbouring employment uses, plus the “blank canvas” the site provides, it is not clear why the developer is not now seeking to provide a scheme compliant with STRAT5.

2. **Open Space.** Policy CF5 requires that open space provided on new residential development meets the standards set out in the District Council’s Open Spaces Study. It is noted that the S106 document that accompanies the associated Outline permission, P18/S3143/O, contains certain standards of play. Within the S106 agreement there is no recognition that the local area is in deficit in terms of access to a NEAP and that the District’s adopted Open Spaces Strategy would seek provision. Paragraph 7.67 of that strategy states:

“For development sites with any housing located more than 400m from a LEAP, or 1,000 m from a NEAP or youth facility then the approach should be, *in priority order*, to:

- Develop on site new LEAP or NEAP, and teenage facilities as required to meet the standard
- If not possible on site, then to a new site(s) immediately adjacent to the housing development and with safe, lit access on foot”

3. Table 33 of the strategy also notes that Thame needs both new, and enhanced NEAPs. As discussed within the Town Council’s previous response, the Council has not had the opportunity to comment on this detail within the S106 document and so has been unable to raise the need for a NEAP within this area of the Town before now. Notwithstanding this reasonable objection, the Town Council believes the proposed open space is lacking in terms of design:

- The north-east LAP should be relocated away from the noise and pollution of Howland Road
- The proposed central LEAP is bordered by parking yet is relatively small. Conflict between users and vehicle owners is likely, especially given the lack of alternative provision suitable for older children.

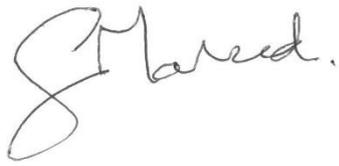
4. **Vehicle charging.** It was originally proposed that each property will be supplied with an external 13A power point “suitable for a fast charger to be installed”. Details have not been provided as to what this will provide charging for; a 13A supply will only enable the slowest form of charging and family-sized vehicles will not be able to be charged, even overnight. This proposal is contrary to Policy TRANS5 ix) in failing to enable the provision of suitable charging facilities for plug-in and other low-emission vehicles in safe, accessible and convenient locations.

5. **Design.** The Town Council recognises the amendments have introduced a more contemporary design approach to the areas described as The Lanes and The Square. The principle established by The Square provides a strong sense of place and will be perceived as a more natural gateway to the development than that offered by the adjacent care home, flats and office building. There will be sight lines both to and from the modern adjacent employment units, and adjacent former railway line. Due to its current use and the proposed screening from the adjacent residential uses, the Town Council does believe the design could be bolder still. This would better achieve the aspiration of TNP ESDQ16 in responding to the character of the site and its local surroundings.

6. It has not been adequately explained how the development works as a whole to reinforce Thame’s character, contrary to TNP Policy ESDQ15. It is, therefore, similarly contrary to Local Plan Policy DES2 in failing to demonstrate how the site’s design has been informed by and responds positively to the site and its surroundings and reinforces the site’s identity by enhancing local character.

Please do not hesitate to contact us, should you require any further information.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'G. Markland'.

Graeme Markland  
Neighbourhood Plan Continuity Officer