

Full Council

Date:	8 August 2023
Title:	Reserve Site C
Contact Officer:	Graeme Markland, Neighbourhood Plan Continuity Officer

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 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.
4. In February 2021, Outline planning application [P21/S0917/O](#), was submitted to resolve the matter of access only, for this 5.86ha site. Due to the requirement of the TNP and Local Plan policies, a number of matters to be demonstrated at Reserved Matters stage or as issues to be resolved through pre-commencement planning conditions were established. Three relevant plans were also approved through the permission, that covered the site parameters, the site's access and the cycle route arrangement along the northern boundary with Wenman Road.

Proposed Development

5. This application, [P23/S2269/RM](#), seeks approval for the appearance, landscaping, layout and scale of the proposed development.
6. It is proposed that there would be 57 dwellings, 22 of which would be affordable. Some 26 homes would be suitable for occupation by people with mobility issues.
7. Some 0.94 of public open space is proposed within and around the housing development. An area of 1.56ha of publicly accessible natural open space would be available next to the Cuttle Brook and it is proposed that defined pedestrian routes would pass through 1.18ha of retained agricultural land. The latter two add up to 2.74ha.
8. The principle that vehicle access for the proposed housing, open space and remaining agricultural land would be made from Hode Garth in the adjacent Hampden Gardens development has already been confirmed through the Outline permission.

Principle of development

9. 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.
10. Other matters 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 (this constraint has been further informed by a planning condition restricting development to 10m in height).
11. The principle of development should, therefore, be considered acceptable if the TNP principles and other relevant policies have been met.

Access

12. As discussed, access has been secured through the 2022 Outline permission. 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.
13. The Highways Team agreed that the trip generation data calculated by the applicant were 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 was judged by the Highways Team to be negligible.
14. The developer has stated that construction vehicles will be able to enter the site through an existing farm gate off Wenman Road, to reduce inconvenience to Warren Mead / Hode Garth residents. Control would be introduced through an agreed Construction Traffic Management Plan and this should help formalise this arrangement. While the use of this access way is welcome, it should be recognised that both Warren Mead and Hode Garth are public highways and it may not be possible to prevent all vehicles arriving at the site from using these roads, on all occasions.
15. 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 access would be provided through two main links within the northeast and northwest "corners" of the site from Wenman Road and a link to Site C to the west. Cycle access to the site would be made via the main north-

south road and the link to Hode Garth, and once inside, the internal roadways, which will be designed to slow mechanised vehicles.

16. Notwithstanding the existing agreed cycle junction, the cycle path could be extended to meet the border of the adjacent plot to the East. This site has been promoted for housing, has been approved by residents as a housing allocation in recent consultations and could provide at least 25 homes. Providing the link to this site's boundary (the Diagnostic Reagents site) would prevent any frustrating gap in future provision.
17. 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.
18. A main route for pedestrians will be the central corridor which will straddle the protected route of the pipeline. As previously proposed, it is intended to split the vehicle / pedestrian route with part of it to the north of and part to the south of the pipeline which may help in reducing vehicle speeds. The main change from the previously submitted scheme is the routing of the "primary" road through the estate from the south to the north. It is claimed that this will help protect the more relaxed character of the southern part of the development.

Housing

19. Planning conditions relating to the Outline permission ensures that there can be no more than 57 homes on the site and that all of the affordable and 1 and 2 bedroom market homes must meet the Nationally Described Space Standards. Some 5% of the affordable dwellings must be wholly suitable for wheelchair users and 15% of the market homes must be suitable for those with mobility issues, including wheelchair users to be in line with the conditions and 2035 Local Plan Policy H11.
20. The proposed accommodation is:

	5 bed	4 bed	3 bed	2 bed	1 bed
Market housing	14	8	13		
Affordable housing			7	13*	2*

*2 as maisonettes, 4 as apartments **as apartments

21. A 40% affordable housing contribution over 57 homes gives rise to 22.8 dwellings. Within the Outline permission's S106 agreement the precise mix of affordable housing units was prescribed. Five of the homes will be provided for shared ownership while 9 will be provided at affordable rent, with 8 at social rent. A contribution of 0.8 of a dwelling will be made as a financial contribution to off-site provision.
22. The applicant is proposing a slight variance from the S106 in swapping out a 2-bed affordable flat for a 2-bed affordable house. This will be subject to South Oxfordshire District Council's (SODC's) agreement.
23. The applicant notes that the combined affordable / market mix is in keeping with Aecom's 2022 Thame Housing Needs Assessment, with a mixture by type of over 60% of the homes being within the 1-3 bedroom range and almost 25% of 5 bedrooms. The 4 and 5-bed homes

proposed are within 1-2 % of the mix proposed by the Assessment. The 3-bed figure falls short, however, while the 1 and 2-bed homes are overrepresented. The agreed S106 document has somewhat skewed delivery towards the provision of small affordable units.

24. A separate test of market housing conformity against the LP 2035 Policy H11 is reasonable, given that the Assessment proposes the mix as relevant to both affordable and market housing.

If applied to the market housing separately, the mix is as follows:

- 5-bed – 40% rather than the Assessment's @ 23%
- 4-bed – 23% rather than @ 13%
- 3-bed – 37% rather than @ 54%.
- 2-bed – 0% rather than @ 10%
- 1-bed – 0% rather than @ 2%

25. The mix is therefore at risk of being contrary to LP 2035 Policy H11, in not having regard to the latest evidence on housing mix.

The parameter plan

26. The successful translation of the TNP's site-specific policies into the developments on the ground has been a key factor in the success of the adjacent, new estates. Primary concerns were the consideration of each site's relationship with / on the landscape. This led to the TNP design approach for this site, which was followed when agreeing the Parameter Plan through the Outline permission.

27. TNP Policy HA7 requires 2.7ha of landscaped publicly accessible open space and a green corridor on the western boundary of the site. The Policy also requires:

- a wide green corridor to the open space to the south that creates a high-quality environment, and enhances biodiversity
- a positive frontage to Wenman Road to provide "breathing space" to the employment buildings opposite. This must be designed as an extension of the space provided as part of the adjacent, Site C development
- that the approach to form, street layout, landscape and density minimises the visual impact of the development. Buildings must not exceed 2 storeys, except along Wenman Road, where up to 3 storeys were seen as potentially acceptable.

28. Condition 2 of the Outline permission demand that the development is carried out in accordance with the agreed Parameter Plan ([P21/S0917/O PP 01-002 Revision F](#)). This Plan responded to Policy HA7 and now has material weight in certain matters.

29. The Parameter Plan is by nature a sketch that establishes principles of matters such as location, green areas, and access points. The Plan largely follows the Masterplan established by TNP Figure HA14 but adds specific information on building heights and a narrowed range of acceptable densities for different areas of the site. Other features agreed include access points for pedestrians, vehicles and agricultural vehicles; the position of the cycle route along Wenman Road; potential play areas and the approximate location of the necessary waste water pumping station and the area for on-site water run-off storage.

30. Parameter plans, therefore, inform and establish "book ends", and items such as areas of green infrastructure, but do not prevent further detail from being added as the design is progressed.

Landscaping

31. The frontage treatment is notably different to that on the adjacent site. Site C benefits from a wide strip of green verge, with the cycle / footpath sandwiched between a second, narrow strip of grass. The path is lined on both sides with trees.
32. The Reserve Site strip between the access road and Wenman Road is several metres narrower than the adjacent site. It is not considered to provide the “breathing space” required by TNP Policy HA7 in depth or design.
33. The detailed landscape plan indicates that the existing vegetation would be retained and in places would form the significant green element, bolstered with some thin strips of meadow grass. On the detailed plans, tree root protection areas are shown which suggests that there are significant, mature elements worthy of preservation.
34. This does not, however, match the ground truth. While noting the requirement in HA7 to show the frontage as an extension to what is present on Site C, it could be considered reasonable to provide a green screen. The proposed retention of existing elements is normally welcomed but in this case the frontage is mostly scrub and bramble. The proposed cycle / footpath comes so close to the Wenman Road frontage (immediately in front of the affordable housing) that it would not be possible to establish any form of substantive foliage. The design of the frontage is, therefore, contrary to TNP Policies HA7, ESDQ16 and the agreed Parameter Plan.
35. The western landscaped corridor has pinch points near to the substation and apartments (plots 32-37) and hosts the main play area for the estate. It is considered that it would, however, act as an adequate buffer to Site C and a sufficiently attractive route to the main play area. The play area itself is formed within its own cul-de-sac that has no connection to the publicly accessible area to the south.
36. TNP Policy HA7 required that a green corridor be provided to the open space to the south and this has been proposed on the eastern boundary. While it is not immediately clear if the mix of wildflower meadow planting and native trees would be considered sufficient to meet the policy need to enhance biodiversity along this route, it should provide the appropriate quality to fulfil its amenity function. It may not, however, be sufficient to screen the development from long views and as such is likely to be contrary to TNP ESDQ22.
37. The Central open space appears less generous in width compared to the matching area in Site C. This is due to the placement of a footpath along its length and the addition of visitor parking bays. The parking bays appear to be partly sited within the buffer area for the aero fuel line. Feedback from the pipeline’s owner indicates an amendment may be required.
38. The publicly accessible open space shown on the Parameter Plan as being split between an area adjacent to the Cuttle Brook, which will allow for relatively free roaming and an area retained for agricultural use that has defined pedestrian routes. The publicly accessible space is shown as separated from the retained agricultural land by post and rail fencing. This area will incorporate the basin for slowing the release of surface waters; a relatively small part of this would be designed to be permanently wet.
39. A large area adjacent to the proposed path would be laid down to what is described as a flowering lawn. Around this would be areas of traditional meadow grassland. Two “islands” of native tree and shrub species would provide structure and habitat and a number of native trees will be dispersed around the area. A particular set of trees are proposed for the south-east of the area that will help visually reinforce the belt of trees south of the Cuttle Brook.

40. This should provide an area of high amenity value that would link to and be consistent with those provided / intended to be provided south of Site C. It appears that there are no seating areas or bins proposed for this area; given the experience of how the equivalent areas are used below Site C, these would be considered essential.

Biodiversity

41. The proposed scheme will be expected to provide a minimum 10% net gain in biodiversity terms due to the 2021 Environment Act. This is measured against the site's existing habitats. Any habitats provided will have to be managed for at least 30 years to ensure that the terms of the Act are fully complied with.
42. The applicant has submitted a biodiversity metric that is stated to show an increase above the minimum in both habitat and hedgerow formation. The proposed growth in habitats appear to be caused by the addition of grassland and shrub, urban gardens and individual trees. A number of bird and bat boxes are proposed for installation on existing, mature trees.
43. It is expected that native species hedgerow will be lost but that there will be an increase in hedgerow, mostly species-rich. It is believed that this will more than compensate for the loss. It will be the role of the District Council's Countryside Officer to establish if the calculated metric is correct.

Design

44. 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.
45. The height of buildings across the whole site has been limited to 10 metres, or 2 storeys, through the Parameter Plan. Density reduces from the front of the scheme to rear. It is claimed the northern-most section is 33.4 dwellings per hectare (dph), the centre 22.2 dph and the southern section 18.1 dph. These figures are within the ranges defined for each section by the Parameter Plan.
46. The site is divided into three separate character areas, roughly following the pattern set by the division of density and the adjacent, existing development. Common to all areas would be white fascia, rain pipes and guttering.
47. The element facing Wenman Road is characterised by orange brick and red/brown roof tiles. The architectural style is simple, with a contrasting, 3-course red brick stringer and contrasting window and corner details, as per the homes fronting the estate to the West.
48. A central belt straddles the oil pipeline with homes fronting / adjacent to the eastern and western boundary. These homes would be built from light red bricks and have grey tile rooves and stone cills to the windows. Some of the prominent homes would have front gable features and / or hung grey/brown tile feature walls but have fewer brickwork embellishments. The apartments would share this style.
49. The southern range would be made of dark red bricks with light contrasting brick stringers and window surrounds. Gables and tile-hung walls would also feature in this area; a few would have external or internal chimneys.

50. “Character” buildings sit on the corners of the main north-south route of the development and the north-west corner. These would use some common elements, such as stringers, contrasting brick and stone cills that could help knit the three different areas. These homes would be made of grey brick with grey or grey/brown roof tiles; red brick plinths and scalloped barge boards would allow these to stand out while not appearing discordant.
51. Blank gable walls also feature on some of the market house styles in particular locations, such as the Arkwright and Draper intended for the central belt. Very limited stringers (just several bricks in length) at ground floor level are not considered sufficient to meet SODC Design Guide criteria on this matter. This would, therefore, be contrary to LP 2035 Policy DES3.
52. The layout and distribution of the various styles should work to provide surveillance of common spaces, such as the network of footpaths and play areas. The District’s Urban Design Officer and Thames Valley Police’s Crime Prevention Design Advisor have / will submit detailed and expert commentary on this matter. It is notable, however, that the main play area sits adjacent to a large house with a blank gable wall and a high brick wall to its garden. This park is within its own cul-de-sac and would, therefore, have no casual passers by to help maintain safety. Close by, it would appear that at least some of the apartment’s parking spaces would not be directly observable from nearby homes as there would be only two windows (serving kitchens in the apartments) with restricted views over the area. This is again contrary to the design guidance.
53. There is insufficient detail shown for hard landscaping such as walls, fences and parking areas. There are some matters of concern (e.g., parking areas passing over root protection areas) but this matter has been made a pre-commencement planning condition through the Outline permission and so could not be addressed at this time.
54. The affordable housing has been split across the site, in 2 relatively small blocks. It is claimed that these dwellings are “tenure blind” in terms of design. Two of the market homes, both “Mason” in style, are similar to the “Tillman” and “Baker” affordable home in materials and finishes. Size aside, they are, however, distinguishable from one another as the affordable homes are shown with a slightly different door glazing style and as having smaller ground floor front windows (theirs, like the “Cobbler” affordable home’s is shorter in height by @30cm). Furthermore, the gable elevations of both Baker and Tillman are presented as lacking features or windows, unlike the “Mason” style, one of which has tile hangings. This is contrary to SODC Design Guidance and, therefore, LP 2035 Policies DES1, DES3 and DES4. They are also less set back from the road frontage and many have correspondingly narrower front gardens.
55. Notwithstanding that, the majority (18) of the affordable homes are proposed as apartment or terraced forms. Their plot and amenity spaces also single them out as very different to the market homes, which are all detached and occupy generous plots with proportionate spaces between each dwelling. It is not felt that LP 2035 Policy H9, and TNP Policy H8, which both seek to ensure that affordable housing is visually indistinguishable from the market housing on site, have been complied with.

Other key matters

56. **Air quality** The District’s Air Quality officer has noted this matter was adequately dealt with through the relevant condition applied to the Outline planning permission.

57. **Heritage and archaeology.** At Outline planning stage, the County Archaeologist confirmed they did not expect any archaeological features to be found. Further detail may arise through the County Council's single response.
58. **Noise.** The District's Environmental Protection Team has advised that the scheme should be conditioned to ensure the recommendations made within the applicant's Noise Impact Assessment are followed. This suggests minimum standards for glazing and ventilation for the dwellings on the Wenman road frontage and notes the windows will not be able to be opened in hot weather. The details of how these properties will avoid overheating will be detailed through the relevant Energy Assessment.
59. **Flooding and drainage.** At Outline planning stage, the District's Flood Risk Engineer was only concerned that the SUDS (attenuation) basin was wholly located in Flood Zone 1 (the area identified as having a low risk of river / surface water flooding). A planning condition will require an appropriate flood risk assessment to be agreed prior to work starting on site.
60. **Parking.** It is proposed that 23 spaces would be available for the use of visitors across the site, which is double the OCC (maximum) standard. Each dwelling will have access to an EV charging point from within their allocated space. The proposed parking arrangements are 1 space per 1 or 2 bedroom flat, and 2 spaces for all other houses. Overall, 110 space have been allocated to plots. Garages add another 40 spaces among the market homes.
61. Secure bicycle parking has been proposed, although it is not clear if it will be fully complied with as the submitted Transport Statement declares provision will be made "where achievable". It is proposed, for example, that where garages are available, these will be used for bicycle storage. Other properties will have a secure shed or store; the capacity of the sheds are not declared. Without demonstrable evidence of how the provision would be met, the proposal is contrary to LP 2035 Policies DES1 and TRANS5.
62. **Active Travel.** This is the first application that we have seen with a response from Active Travel England. They have passed a guidance note to the case officer appropriate for a development of this scale. This gives advice on matters such as walking and wheeling routes, street and junction design, etc.

Summary of policy matters – Thame Neighbourhood Plan and Local Plan 2035

63. **TNP Policies H7: Provide new facilities; HA7: Reserve Site C; ESDQ2: Allocated sites to provide open space in locations specified in Section 3.** It has been demonstrated how the provision of 2.7ha of publicly accessible open space would be provided and connect to other spaces. TNP Policies H7, ESDQ2 and site-specific HA7 can be considered complied with.
64. **TNP Policies 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). However, it is recommended that the cycle / footpath on Wenman Road be extended to the site's eastern border.
65. **TNP Policy H6: Design new development to be of high quality.** This is linked to the specific allocation. The principles of TNP Policy HA7 and TNP Figure HA14 have largely been complied with, although some design concerns (blank elevations, surveillance of open spaces) remain. Unfortunately, the need to design a positive frontage to Wenman Road with "breathing space" to the industrial buildings opposite, in line with the adjacent Site C, has

not. The proposal is in this respect contrary to TNP HA7, TNP Figure 14 and the agreed Parameter Plan.

66. **TNP Policy H8 Provide Affordable Housing and LP 2035 Policy H9 Affordable Housing:** The affordable housing is distinguishable from the market housing for the reasons given in paragraphs 53 and 54, above. The proposal is therefore contrary to TNP Policy H8 and LP 2035 Policy H9.
67. **TNP Policy H9: provide a mix of housing types** has been met. The most recent housing mix assessment is Aecom's, 2022 Thame Housing Needs Assessment. While the mix of affordable housing has been agreed through a S106 agreement, the market housing varies substantially from the preferred mix. This is contrary to LP 2035 Policy H11 and, arguably, TNP Policy H10.
68. **LP2035 DES1: Delivering High Quality Development, DES3: Design and Access Statements, DES4: Masterplans for Allocated Sites and Major Development:** There is a presumption within the SODC Design Guide against blank elevations yet there are many among the market and affordable houses. This is contrary to these LP 2035 Policies.
69. **ESDQ9: Sites C, D and F to provide riverside walks within natural green space.** The proposal is compliant with this policy.
70. **ESDQ15: Developers must demonstrate in a Design and Access Statement how their proposed development reinforces Thame's character.** The form and style of the housing is argued through the submitted Statement and is close to the development approved and built on Site C, to the west. This policy requirement has been met.
71. **ESDQ16: Development must relate well to its site and its surroundings.** The proposal should have followed the site-specific principles, but its frontage treatment does not relate well to the adjacent Site C. The development is, therefore, contrary to TNP Policy ESDQ16.
72. **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.
73. **ESDQ22: The visual impact of new development on views from the countryside must be minimised.** If the eastern boundary is reinforced as originally proposed, then the visual impact from the east will be minimised. As currently proposed, this development is at risk of being contrary to ESDQ22. It is unlikely that there will be a negative visual impact from other directions, including the high ground within Thame Park to the south.
74. **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.
75. **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.

76. **LP 2035 Policy TRANS5:** In failing to demonstrate fully how bicycles will be parked (and, where appropriate, charged) the proposal is contrary to LP 2035 Policies TRANS 5 and DES1.

Recommendation:

77. It is suggested that Thame Town Council object to this application.