

Planning & Environment

Date:	17 October 2023
Title:	Reserve Site C – P23/S2269/RM – Amendment No.1
Contact Officer:	Graeme Markland, Neighbourhood Plan Continuity Officer

Background

1. In September 2021, Outline planning application [P21/S0917/O](#), was granted permission to resolve the matter of access 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.
2. Application [P23/S2269/RM](#), which took these matters into account, was considered by Full Council on 8 August 2023. The Town Council objected on the following grounds:

Contrary to Thame Neighbourhood Plan (TNP) policies:

- HA7 – Reserve Site C - Allocation for 57 residential dwellings
- H8 – Provide Affordable Housing
- H10 – Provide a Thame-Specific Affordable Housing and Dwelling Mix Strategy
- ESDQ23 – Streets within new development must be designed as pleasant places to be

Contrary to Local Plan 2035 (LP 2035) policies:

- DES1 – Delivering High Quality Development
- DES3 – Design and Access Statements
- DES4 – Masterplans for Allocated sites
- H9 – Affordable Housing
- H11 – Housing Mix

Proposed Development

3. The application has been amended to address the concerns raised by the Town Council and other formal consultees. Changes have been made to landscaping, layout, access and parking. Affordable housing has been better distributed across the site to help integrate it within the wider scheme.
4. It is still proposed that there would be 57 dwellings, 22 of which would be affordable.
5. As before, some 0.94 of public open space is proposed within and around the housing development. A larger area of 1.86ha of publicly accessible natural open space would now be available next to the Cuttle Brook. This has been enlarged through the move of the SUDS basin on to part of the retained agricultural land. The amount of retained agricultural land (with a pedestrian route through) will decrease to 0.84ha. There has, therefore, been a gain in the amount of proposed public open space.

Town Council objections

6. The Town Council's policy objections derived from the following concerns.
7. **Cycle path.** The path on the Wenman Road frontage did not extend across the full width of the site. The applicant has submitted a series of plans demonstrating that the path will now reach the eastern boundary.
8. **Frontage Treatment.** The pedestrian / cycle link on the Wenman Road frontage has been simplified. It is proposed as a tree lined avenue with green verges on either side, in line with the approved Outline planning permission's parameter plan. While the verges are not as wide as that serving Site C, they are now uninterrupted by parking bays. The north verge is proposed to have a hornbeam hedgerow running down its centre with what is assumed to be grass "highway" verge on the Wenman Road side, and grass on the other. The hedgerow would replace the existing, scrub hedge and may help reduce some of the immediate road noise.
9. The verge to the south of the bicycle path is also proposed as grass, with interspersed rain gardens up to 10 metres in length. The proposed design would provide an acceptable "breathing space" as required by TNP Policies HA7 and ESDQ16.
10. **Central open space.** This area has been largely redesigned. All of the parking bays have been removed and there is now only one vehicle crossing point, which improves the quality and function of this amenity area.
11. **Play area not overlooked.** Plot numbers 29-32 (four maisonettes) and 47 (a detached home, WA-5B-2S-P3) have been redesigned / repositioned to provide observation of the play area from habitable rooms. There is also now a second means of access to the scheme's southern road, meaning it is more likely there will be some "through" traffic to help with surveillance.
12. **The eastern boundary.** The Town Council thought there could be a risk of the development having a negative impact on views from the countryside. It has been proposed that the eastern boundary is reinforced with native tree and shrub planting belts. This matter was also raised by District's Landscape Officer and will therefore receive the appropriate attention.
13. **Provide bins and seating** within the Cuttle Brook open space. The applicant has submitted plans showing a dog waste bin on the western boundary, and two areas of seating, each with a litter bin, next to the proposed Cuttle Brook path.
14. **Blank gable walls.** The market and affordable homes (Arkwright and Draper, Baker and Tillman, respectively) were notably plain, contrary to the Joint Design Guide and best practice. The applicant has stated exposed gable / flank elevations that address the public realm will now have additional windows to improve surveillance and to add aesthetic appeal. Their style and placement do not appear to have been demonstrated on any of the submitted plans and it is not clear which plots the changes could apply to. For example, plots 35, 52 and 53 all have gables that would be visible from the public realm but the degree of impact will differ between them. It is suggested this matter could be addressed through a planning condition.
15. **Insufficient landscaping details.** This applied to the mix of fences and walls and their choice of materials, which have not been definitively shown on submitted plans. The applicant's note on this refers to this as a matter for the architect. It is suggested that our objection to this be removed, subject to the District Council's satisfaction.

16. **Bicycle parking.** The maisonettes now have clearly defined amenity spaces and integral or connected cycle stores. Other cycle stores are either within garages or sheds and shown on Plan 062204-BEL0TV-02-B.
17. **Housing mix.** The Town Council noted that the mix of affordable housing had already been prescribed through the Outline Planning Permission's S106 agreement and could not now be affected. The market housing was not prescribed, however, and should refer to the latest evidence on housing mix within the 2022 Thame Housing Needs Assessment, HNA.
18. This report investigated the mix suitable for both affordable and market housing. Within Table 5-9, it proposes a housing mix and declares it is applicable to both affordable and market tenures, meaning it should be applied to each tenure in turn.
19. As before, no market 1- or 2-bedroom homes are proposed. The applicant has slightly changed the proposed mix from the earlier Reserved Matters application. The number of 3- and 5-bedroom homes have each been reduced by one, and the number of 4-bedroom homes increased by 2.
20. The applicant responded to our objection by noting and stating that the Draft Thame Neighbourhood Plan 2 Policy GDH3: "Criterion 6 applies which states...at least 65% of all new homes should comprise 1-3 bed properties. This clearly applies to a development as a whole, not just the affordable or private elements."
21. Policy GDH3 is a Regulation 14 draft policy with little material weight and it may help to look further at the March 2022 HNA for clarity. Paragraphs 176 – 181 discuss the benefits of focusing on mid-sized homes in order to assist with both affordable and market housing affordability and to offer choice for younger households upsizing and older households downsizing. Additionally, given that the affordable housing provision was particularly biased towards the provision of small units it is recommended that the Town Council maintains its objection.
22. **Affordable housing must be visually indistinguishable.** LP2035 Policy H9 and TNP Policy H8 require affordable housing to be visually indistinguishable from the market housing on site. This matter arose as the affordable housing, Tillman and Cobbler, clearly had smaller ground floor windows (shorter) and narrow gardens. The applicant has stated these have narrower frontages and the window sizes are proportionate. However, a proportionate reduction would be expected to affect both height and width. Regardless, the upstairs windows were and remain identical in height / width between the tenures and types.
23. While it is claimed the short terraces of affordable housing have been changed to semi-detached form to help them blend in with the market housing, they will still be discernible in the street scene. Comparing Tillman and Mason, for example, there is a visible difference in internal layout and footprint. The market Mason is a few square metres larger yet is a 4 person home, the Tillman a 5 person home. They are performing a similar function, yet they are clearly distinguishable from one another. The policy test is that affordable housing should be indistinguishable from market housing. "Indistinguishable" should be understood in its plain-English context, i.e., there should be no discernible difference between them.
24. It is recommended that the Town Council maintains its objection.

Other amendments

25. General changes made in response to formal consultees:

- The north-south road has been aligned and turned into a tree-lined avenue. This alignment will provide a further view into the countryside from Wenman Road in addition to that required by TNP Policy HA7 on the site's west.
- The central footpaths have also been straightened as part of these changes, and their junctions to and across the central green space simplified.
- The internal street layout has been simplified and the area of tarmac reduced in favour of block paving.
- A greater mix of housing types has been introduced, especially on the site's southern border with the retained agricultural land.
- All of the affordable housing has been given allocated parking spaces.
- It has been confirmed the applicant will try to take construction traffic directly off Wenman Road. This will be confirmed through a Construction Traffic Management Plan, which will be subject to the approval of the District Council.

26. Landscaping:

- More hedgerow planting has been proposed for the site's western boundary.
- Sections of rain garden have been introduced across the site.
- A greater variety of specimen shrubs introduced through the residential areas.

27. The above changes, including those listed in paragraphs 7 – 16 above, are considered positive. They should help ensure the quality environment for residents and visitors sought by the Thame Neighbourhood Plan.

Recommendation:

28. For the reasons given in paragraphs 17 – 24 above, it is recommended that Thame Town Council object to this application.