

Full Council

Date:	18 November 2024
Title:	Land to the east of Howland Road (B4012) and south of Kingsey Road
Contact Officer:	Graeme Markland, Neighbourhood Plan Continuity Officer

Proposed Development

1. This application description of planning application [P24/S3132/FUL](#) states:

Outline planning application (all matters reserved except for access) for the construction of up to 75 age restricted dwellings (over 55's) (Use Class C3), including 40% affordable housing and communal facilities, together with access off Kingsey Road, landscaping and all enabling ancillary works. (As amplified by additional information received 12 November 2024).

Background

2. This site was the subject of a planning application in July 2020, P20/S2593/O. The applicant had been working with local GP surgeries to provide a new, purpose-built facility for both the Rycote and Unity Health practices. The Town Council and the applicant had many discussions over several years regarding the possibility of bringing this land forward for that purpose. When finally submitted, the application proposed other development that could not be supported by policy. The application was withdrawn ahead of determination on 20 May 2022. Thame Town Council held a pre-application meeting with the applicant regarding this proposal in mid-August 2024.

Policy Considerations – the Development Plan and National Policy

3. The homes proposed would be within C3 Use Class, which makes them dwellinghouses. The homes would be restricted to those aged 55 or over.
4. Policy H3 of the District Council's 2035 Local Plan (2035 LP) states that Neighbourhood Development Plans should seek to meet demonstrable local needs and gives the example of specialist or affordable housing. Policy H1 of the 2035 Local Plan explains that specialist accommodation for older people can sit within either Use Class C2 or C3. It is the District Council's role to decide if the proposed dwellings sit within C3 use.
5. Policy H1 3. explains that residential development on sites not allocated in the Development Plan will only be permitted where:
 - ii) it is for specialist housing for older people in locations with good access to public transport and local facilities; or
 - iii) it is development within the existing built-up areas of Towns and Larger Villages as defined in the settlement hierarchy...; or
 - iv) it is infilling, and brownfield sites within Smaller and Other Villages as defined in the settlement hierarchy...

There are other clauses discussed such as for sites brought forward through a Community Right to Build Order or Neighbourhood Development Plan / Development Order. From this

list, it is believed the applicant will be relying on H1 3. ii) to bring this proposal forward, i.e., the dwellings would be for specialist housing for older people in locations with good access to public transport and local facilities.

6. The National Planning Policy Framework (NPPF) states that the need for different groups in the community should be assessed and reflected in planning policies, including those of older people. The District Council have reflected these needs within Policies H1 and H3. The NPPF glossary explains that older people are those:

“People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs”.

7. This glossary entry helps provide some clarity on the types of homes that should be provided on any such development as that proposed. The homes need to be accessible and adaptable housing, or greater. They must not be general needs homes due to the proposed age restriction.
8. The Design and Access Statement states that the applicant has assessed the headline benefits of the proposed development as required by local policy:

Economic:

- Creation of construction industry jobs – these are ephemeral and are rarely given much weight in decision making;
- The new homes bonus from central government – the bonus would be available to the District Council for use for revenue or capital projects and is not unique to this proposal;
- Increased local expenditure – it is likely a proportion of any new residents will already live, work and shop in the Thame area.

Social:

- Provision of new homes, including 40% affordable – Thame’s Housing Needs Assessment demonstrates that affordability depends very much on the model and discount applied;
- Delivering homes for which there is a “significant” need locally;
- Freeing up family homes through people downsizing.

Environmental

- New landscaping as part of the development – without the development there would be no need for landscaping
- Minimum 10% net gain in biodiversity – without the development there would be no need to provide a gain in biodiversity
- Provision of more energy efficient housing – this is not unique to this proposal.

Access and transport

9. The applicant has provided a Transport Statement, dated September 2024. Within this document it is explained that a full Transport Assessment was undertaken as part of the withdrawn scheme and agreed by Oxfordshire County Council. The Statement has been submitted to respond to this proposal, which they claim is a reduced scheme in transport terms.

10. The applicant has produced walking and cycling Isochrone lines to local facilities and services (Figures 4.1 and 4.2, Transport Statement). The distances and travel times shown are accurate and could be managed by someone in good health. The diagrams do not account for local road conditions / lack of footpaths nor the recommendations that 400 - 800 metres is the distance most commonly quoted as being the target for distance to services, as explained in the emerging Thame Neighbourhood Plan 2 (TNP2). The distance to the High Street from the site is estimated within the statement to be about 1,350 metres. The Statement correctly identifies the nearest bus stop at Churchill Crescent and Queens Road but the Transport Statement also proposes two new ones either side of Howland Road, south of the Fanshawe Road junction.
11. The Transport Statement proposes that access would be made off Kingsey Road, served by visibility splays set by the proposed 40mph speed limit that would be introduced in line with the County's agreement for the prior application. A ghost island would assist with right-turns into the site. The Statement estimates that during peak hours 10 vehicles would move in or out of the site during the AM peak and 7 during PM peak.
12. Pedestrian access would be made through the provision of signal-controlled crossing north of Fanshawe Road. It is, again, proposed that a new footpath from this will connect to that already existing in Fanshawe Road. It appears that the carriageway at Fanshawe Road would be narrowed to 4.8 metres in width.
13. In terms of parking, 94 spaces would be provided while it is claimed bicycle provision will be made to Oxfordshire County Council (OCC) standards. EV-charging will be provided in accordance with Building Regulations.

Flood risk

14. The site is not considered to be at risk of flooding by river. A small part of the site is potentially at low risk of surface water flooding due to a natural / man-made depression.

Water and sewage

15. Thames Water have stated they would not have issues with foul water connections but would not be able to provide fresh water without upgrades or a phased infrastructure / development plan from being agreed.
16. The Environment Agency (EA) have also responded on the matter of sewage. The EA state they are aware that the Sewage Treatment Works at Thame is not complying with its current permit limits. Further connections will risk deterioration of the environment of the Scotsgrove Brook. They state upgrades and/or improvements will need to be taken to make them fit for purpose. It is assumed this is in effect a holding objection pending proof of how Thames Water have or will comply with their environmental permit.

Heritage

17. Confusingly, the first section of the Design and Access Statement refer to the need for the development to respect the onsite heritage assets. The applicant has submitted an Archaeological Assessment (desk-based at this stage in the planning process) that appears to agree with the Town Council's knowledge of the area. It states there are no known heritage assets within the proposed development areas. The Statement explains that previous

geophysical surveys and evaluation trenches did not show any significant assets although there are likely features nearby.

Ecology

18. The applicant has submitted an Ecological Impact Assessment and Biological Net Gain Assessment (August 2024). This document and its findings has not been appraised in detail as this would be liable to be updated at Reserved Matters stage following any potential review of the site's design.

Dwellings

19. Details are necessarily sparse, but the applicant states the layout as shown would lead to the following indicative mix:

Market homes:

- 15 x 2-bed apartments
- 22 x 2-bed houses
- 8 x 3-bed houses

Affordable

- 9 x 1-bed apartments
- 21 x 2-bed apartments

Design

20. The applicant has submitted 5 parameter plans which they believe are suitable to set the precedent for how a subsequent Reserved Matters application would be brought forward. These are:

- A land use parameter plan that aims to define how much of the site could be used for built development, and where it should be placed
- A density parameter plan which aims to demonstrate how changes in density could be managed across the site
- A building height parameter plan identifies the maximum height of the built development and how and where this should change across the site
- An access and movement parameter plan showing how access to and through the site for pedestrians and vehicles would be made
- A blue and green infrastructure plan to identify where areas of open space, private amenity and essential landscaping would sit.

21. The above must necessarily inform each other, e.g. green open space cannot be provided under roadway. The success of any parameter plan will be to make sure that fundamental constraints for the site and its location lead in the generation of the plans meaning the built elements respond to those. In this, the proposal fails.

22. The applicant has drawn particular attention to a conceptual layout for the scheme as an illustrative Masterplan. This helpfully combines the outcomes of the five parameter plans into a potential design.

23. From plan-view, the site appears as a square block of development dropped into open countryside. On this site, there are no natural features to act as boundaries on the eastern

and southern boundaries, meaning it would be difficult to suggest a rational means of treating the edge of the development. No attempt, however, has been made to do this.

24. Within the site the buildings have been arranged around the central core apartments and resident facilities. All other buildings reference this core, meaning the development on the north, south and east boundaries look inwards; it is not clear if the apartments on the western flank would present a “face” to the adjacent Town. It appears to make no attempt to be seen as welcoming and part of Thame. While this approach might help internal navigation the development immediately appears insular and inward looking. This might make the occupant feel safe but the design, with backs to the surrounding roadways and countryside, has the potential to make them vulnerable.
25. The central core of the development is wrapped around what appears to be a semi-communal space that will be overlooked from all directions. Given that the number of residents living in apartments would be high it would have been helpful if an area of quiet amenity space was identified, ideally away from Howland and Kingsey Roads.
26. The inner ring-road is somewhat dominated by parking spaces. An illustrative concept the plan cannot easily show the applicant intends to follow Design Code guidance on regarding the introduction of soft planting and landscaping. There is a risk, however, that the need for parking (94 spaces) could dominate the street scene.
27. Working from west to east across the site, the density / height plan places higher buildings adjacent to Howland Road and the Kingsey / Howland Road / Tythrop Way junction. As shown on the illustrative plans, these would be sizeable, hybrid-roofed properties, with flat elements spanning ridges at near ridge-height. These are described as 2.5 storey in height but are arguably closer to three-storey in nature, introducing a new scale and form for domestic properties out of keeping within the Howland Road and Tythrop Way street scenes. The remainder of the site is described as 2-storey in height. While illustrative plans appear to show 1.5 storey heights (e.g., the axonometric plan) it is the detail shown on the parameter plan and within the Design and Access Statement that matter.
28. In terms of policy, the proposal is contrary to Local Plan Policies DES1 and DES2 and TNP Policy ESDQ16 and ESDQ17 in failing to respect the character of the area. The Design and Access Statement is also inadequate. The Statement fails to explain what led the applicant to the proposed design solution. This is contrary to 2035 LP Policy DES3 and TNP Policy ESDQ15.

Landscape

29. The site would be located in a prominent corner on the edge of Thame’s settlement. This would in effect introduce a new gateway into the Town; indeed, the applicant has gone so far as to suggest the placement of new welcome gates at the point Kingsey Road would become 40mph, to the site’s east.
30. It is intended to keep the majority of the wooded / scrub area in the northwest of the site. This does reduce the opportunity for the site to host a landmark building. The key Policy as far as the TNP is concerned is ESDQ22, which aims to minimise the visual impact of development on views from the countryside. This requires an adequate visual impact assessment to be submitted explaining how the site layout and form minimises visual impact.
31. At this outline stage it would perhaps be unreasonable to expect images that fully demonstrate how the proposal would site within the landscape. The views from Howland Road, from Kingsey Road and the longer views from Windmill Road, Towersey and the nearby bridleway are currently only impacted by the edge of Thame’s settlement, and to a

lesser degree by the Chinnor Rugby Club's assemblage of buildings. Sporting facilities are, however, frequently located and expected on the edge of settlements.

32. Viewed from Windmill Road, Kingsey Road and the bridleway the development will introduce a new, stark built edge with only narrow, partial mitigation. The impact will be notable year-round, but especially in winter months when lighting and vehicle movements will be more notable. The intervening hedgerows are not sufficient to conceal the proposed development, and the increased height of the 3-storey element fronting Howland Road will be particularly notable.

Summary

33. The proposal is not without benefits. The potential for harm, however, currently greatly outweighs them.
34. The proposal neither reflects nor enhances the local character of its location. The design approach is not explained and the proposal is, therefore, contrary to 2035 LP Policy DES1, DES2 and DES3 and TNP Policies ESDQ15, ESDQ16 and ESDQ17.
35. The application will cause harm to the landscape and how Thame is experienced from the countryside. There is minimal mitigation proposed. This is contrary to the 2035 Local Plan Policy ENV1 and TNP Policy ESDQ22.

Recommendation:

36. For the reason given above, it is recommended that Thame Town Council objects to this application.