South Oxfordshire Core Strategy Examination
Statement on behalf of Banner Homes Ltd
By RPS Planning and Development
Day 3: Thursday 3 November
Thame (Chapter 11)

This statement addresses the questions set out in ID/19 in turn.

(A) Does the CS (as amended by the Proposed Changes advertised in July-August) make sound proposals for the town in terms of housing, employment, retailing, transport and other infrastructure? Would these proposals appropriately serve the particular needs of the town and any wider area and take proper account of local opportunities and constraints?

We consider that the allocation of 775 dwellings to Thame is inappropriate. Although this figure represents a significant increase on the 530 dwellings proposed in the Submission draft, that increase only came about as a result of the Council being obliged to comply with PPS3 paragraph 59 on the matter of windfalls in order to remove an obvious and fundamental source of unsoundness.

This was a necessary but not a sufficient step, however. The 60:40 ratio between the towns and larger villages, and the principle of proportionality, appear to have been applied again in circumstances where in our opinion they are even less appropriate than they were originally. In these circumstances the Council should have gone back to first principles and reassessed the position at Thame having proper regard to (for example) its demographic and economic characteristics, relationship to higher order settlements, and role in its hinterland, as well as the demand for market housing and need for affordable housing to the extent to which these can be separated.

Once again we must emphasise the fundamental point that Thame, unlike Henley and to a certain extent Wallingford, is not affected by any higher order environmental designations or other serious constraints.

We reaffirm the view expressed in earlier representations that the provision of two hectares of employment land in Thame is wholly inadequate in relation to the level of...
housing provision proposed. It was insufficient in relation to the 530 dwellings proposed in the submitted version of the CS, insufficient in relation to the total (775) now proposed, and would be insufficient in relation to the even greater level of housing provision needed if as we believe, Thame should be the location for any provision which cannot be made at Henley and also for some of the housing currently proposed for the larger villages. It is inadequate in relation to the numbers of economically active people likely to arise from the housing development, and will not help to reinforce the degree of self reliance in employment which must be one of the most important criteria of sustainability for towns of this kind.

We therefore conclude that the Core Strategy’s proposals for housing and employment are not sound.

We address the scope and status of the Thame Neighbourhood Plan under Question (C) below.

(B) Is the identified strategic site allocation at North-west Thame ‘justified’ in terms of its location and size? Is it founded on a robust and credible evidence base? Is there a clear audit trail including appropriate SA/SEA (culminating in the recent schedule of changes to the December 2010 SA) and other evidence indicating the steps by which the selected site was chosen as the most appropriate when considered against the reasonable alternatives? Would development at the selected site be ‘effective’, in terms of being deliverable within the expected timetable?

Our conclusion below is that on balance, and in present circumstances regarding the Neighbourhood Plan, it would be more appropriate for the Core Strategy not to make a strategic allocation at Thame.

Nevertheless, if it is eventually concluded that a strategic allocation should be made at Thame, then we consider that the proposed strategic allocation North West Thame is not the most appropriate and is not justified.

As already made clear in earlier representations, Site D was consistently the Council’s preferred option as a strategic site from its first identification to the series of meeting in late 2010 preceding the submission of the Core Strategy. The Council clearly took the opportunity afforded by the newly elected Government’s intention to
abolish regional strategies to reconsider the strategic options at Thame (see Strategic Housing Allocations report, paragraph 44) on the basis that only 530 dwellings needed to be provided for by means of a strategic site. This appears to lie behind the very late decision to allocate site F instead of Site D.

One of the underlying purposes of the development plan system introduced by the 2004 Act was to prevent the very long local plan inquiries which had marked the later stages of the local plan system. The first version of PPS12 emphasised front loading and the assumption that submitted plans would be sound. Although the latter point was modified in the current version of PPS12, nevertheless the implied objective that there be as little disturbance as possible to a Council’s plan on its way to adoption seems to have remained. This places a heavy responsibility on LPAs to get the plan right, or a right as they can, in the first place, and this requires a detailed and transparent justification for choices made and alternatives rejected.

In this context the documentation produced by the Council to support the Core Strategy is in our view unsatisfactory. Much of it appears to be a rationalisation of choices already made, rather than leading to the consideration of reasonable alternatives and the eventual decision.

In particular, in the Strategic Housing Allocations report which was considered in quick succession in late 2010 by the Cabinet, Scrutiny Committee and full Council there is no balanced and systematic discussion of the comparative merits of Site D and Site F to justify the recommendation at paragraph 68 that site F be allocated for 530 dwellings. This is in our view the most important single document in the “audit trail” to which the question refers.

The paragraphs leading to paragraph 68 set out in bullet point form the advantages and disadvantages of Sites D and F. If, as the Council appears to have claimed, there is little to choose between the merits of the sites, a much more detailed discussion of the advantages and disadvantages could be expected to support a decision on favour of one site or the other.

To take the disadvantages first, those for site D refer to transport issues and the physical boundaries of the town. In the former case, detailed highways design could without difficulty mitigate some of the implied effects, and detailed design of the development for site D as a whole could overcome any perceived disadvantages
relating to the urban edge; indeed, the relationship between urban and rural could be significantly improved by the proposed development, and that possibility is actually acknowledged in the list of advantages.

In contrast, the disadvantages of Site F, in terms of landscape impact and setting of the parish church (Grade 1 listed), and the lack of accessibility to some of the town’s primary schools are in our opinion much more significant disadvantages which could not readily be overcome.

Turning now to the advantages, the first bullet point for Site F and Site D is identical – but the degree of proximity to the town centre is not measured. In terms of opportunities for safe and sustainable travel, site D adjoins the Phoenix trail; Site F is described as close to it, but the exact relationship is not defined.

On the basis of the information presented in this report, it would in our opinion have been appropriate to recommend the (continued) allocation of Site D. Its merits were not undermined by the reduction in housing provision which the Council was then considering but which appears to form the only basis for the reconsideration of options.

This recommendation became even less sound when as a result of the representations by a number of parties on the matter of windfalls in the consultation stage (January 2011) the Council was obliged to remove the windfall allowance from the CS and allocate land for the relevant number of dwellings (about 800) elsewhere. In Thame, this has put pressure on the capacity of site F, and created a situation in which the Council now wishes the SADPD to identify land for a further 175 dwellings where no such further allocations were earlier considered necessary. The latter is not necessarily a problem; but it illustrates the broader difficulties, discussed in the statement on the overall strategy, of applying the 60:40 ratio and the principle of proportionality where the characteristics of the District demand a much more subtle and detailed approach.

(C) Is the proposal to identify 175 additional dwellings at Thame via the Site Allocations DPD sound? If not, why not?

We consider that three issues combine here. The first is that of the total level of housing provision for Thame and its consequences.
The second issue is whether the Site Allocations DPD has a role to play if it is concluded that all of Thame’s housing requirement can be accommodated on a single strategic site. Our conclusion in respect of Henley is that about 200 of the 400 dwellings proposed to be allocated in the SADPD for Henley should be reassigned to Thame, and that some of what we consider to be an excessive number to be allocated to the larger villages (also through the SADPD) should also be reallocated to Thame.

We conclude from this that a SADPD potentially has a role to play, even if the number of dwellings for which it has to find sites is greater or less than 175.

Thirdly, however, the matter is complicated by the issue of the scope of the Neighbourhood Plan. The bid for front runner status, confirmed as successful in a list published in the CLG website at the end of August, was jointly prepared by SODC and Thame TC. This document is clear that the Neighbourhood Plan will identify non-strategic sites for housing. This is not inconsistent with what the Core Strategy proposes, in the sense that the Neighbourhood Plan could, in terms of scope and timing, perform the function of the SADPD in its coverage of Thame parish without difficulty.

However, it now appears that the Town Council, in association with its appointed consultants, wishes to allocate sites to provide for all of the housing requirement in Thame – whatever total emerges from the end of the Core Strategy process.

We therefore conclude, to put the terms of question (C) more broadly, that it would not be unsound for a SADPD to allocate the residual amount of housing for the town once the overall requirement has been set and the capacity of the strategic site (or sites) determined. However, this question has in our opinion been superseded by the issue of the scope of the Neighbourhood Plan and what appears to be a clear difference of view on this matter between the District Council and the Town Council. Bearing on mind the fact that neighbourhood planning is in its trial stages we are not clear what procedures are available to resolve this issue.

Nevertheless, it is clear that neighbourhood planning represents one of the directions of travel for planning in the future. The selection of Thame as one of a number of front runners at the end of August post-dated the close of consultation on the proposed changes to the Core Strategy. This in our view represents a significant
material change in circumstances which should fully be taken into account in the remaining Examination sessions and in conclusions drawn on the Core Strategy.

The one potential adverse consequence of the NP choosing all the sites for housing in Thame is that there might be a slight delay in the identification of a strategic site or sites and thus the delivery of houses on it (or them). However, it is already apparent not only from the proposed timetable for the NP but the progress on it so far that in practice very little delay if at all would occur. There is clearly a great deal of enthusiasm for the NP and a considerable amount of momentum has been built up. The NP is likely to be in place scarcely any later than the Core Strategy, and far more quickly than the SADPD, which will need to consider the allocation of smaller sites across most of the rest of the District, not just in Thame.

We therefore conclude that the Core Strategy should confine itself to setting (minimum) housing and employment land requirement figures for Thame. The NP is in our view capable of allocating sites and moreover is likely to do so more quickly, and with a greater measure of local support, than through established planning processes run by the District Council.

(D) If Chapter 11 is not legally compliant or sound are there appropriate changes which would make it so? If such changes were introduced, what would be the implications in terms of consultation and sustainability appraisal?

We consider, for reasons already given in our January representations, that Chapter 11 is not sound on the grounds that it is neither justified nor effective. Further, we consider that the subsequent changes – the increase in the level of housing provision at Thame as the result of the (appropriate) exclusion of any allowance for windfalls, make the Core Strategy even less sound in that greater numbers are now expected from the preferred strategic site, Site F.

The principal change we recommend is that which we have advocated throughout – that Site F be deleted from the Core Strategy and replaced with Site D, to accommodate 850 dwellings. This implies that the division of responsibilities between the Core Strategy and the Neighbourhood Plan is as set out in the bid for front runner status; although, as we have acknowledged in response to question (C), there are unresolved issues here.
Our experience elsewhere suggest that if the District Council reverts to Site D as its principal allocation in Thame, a further round of formal consultation and sustainability appraisal would be essential.