
Summary of main points (please see detailed commentary below):

- SODC has not subjected the significant overprovision of housing against viable alternatives as part of the sustainability appraisal.
- The allocation of housing using a method based on the numeric distribution of housing is not sound. This renders the Local Plan, plus the accompanying Sustainability Appraisal as unsound.
- No discernible account has been taken of cross-border strategic issues that would affect South Oxfordshire settlements.

Detailed commentary

Where Thame Town Council indicates we are supporting policies, it normally means we also approve of the policy's supporting text. If we have not mentioned a policy or text, it means we have no strong views. Please note, text in blue is that as written by SODC within the Local Plan Second Preferred Options document. It has been included for clarity. Recommendations for change are indicated in the usual way with struck-through text indicating deletions and underlined text indicating additions. All Thame Town Council text is shown in black.

Spatial Strategy

1. Paragraph 4.6 – Strike out text “... and the market towns of Thames, Wallingford and Henley on Thames.”
2. Paragraph 4.8 – “The preferred option for the Council is a blend of some of these options... It is also complemented by the identification of new settlements and the location of development to fund regeneration”. There is no evidence presented that Thame needs regeneration, driven by housing growth, nor is it obvious that we have a need that can only be delivered through housing growth. Currently, the District is placing development in an area where it has not demonstrated that it is sustainable.
3. Paragraph 4.9 – “Deliver sufficient new homes to meet the needs of our communities and economy supported by appropriate infrastructure, services and facilities”. By applying a blanket 15%, Thame seems to be meeting a part of all of SODC's housing needs. Is there evidence this is where people from the housing market area, including those who need to work in Oxford, want to live? Through the 15% methodology, no evidence has been provided of any efforts to balance jobs growth with housing.
4. Policy STRAT1 - The Overall Strategy – “Supporting the roles of Henley, Thame and Wallingford by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-used developments and by providing new homes, jobs, services and infrastructure”. For Thame, all you have largely suggested in the Second Preferred Options document is the provision of new housing, and a degree of employment that we believe does not match the local need. We welcome however the statement within the Employment Topic Paper of April 2017 that Thame may make further employment allocations.
5. Paragraph 4.22 - “Between 6 & 7 ha... is needed for offices... with some demand in Henley, Thame and Wallingford... The study supports our allocation of a substantial amount at Culham Science Centre and suggests the remainder should be allocated in the Didcot station area and Monument Business Park in Chalgrove with the residual floorspace provided in Henley, Thame and Wallingford town centres. There is a need for some smaller and flexible offices which could well be provided in our market towns”. How “local” did the Employment Land Review look in terms of offices? Was this a paper exercise? Local estate agents suggest a dire need for all business uses across Thame.

6. Paragraph 4.23 “Between 10.5 and 17.7 ha of the total requirement is needed for industry and warehousing...Wallingford and Thame area also areas of demand”. Thame Town Council welcomes this recognition of the demand for new employment land and floorspace in Thame.
7. Policy STRAT2 – “The appropriate level of new housing and employment will be monitored and a review undertaken five years following the adoption of the Local Plan and periodically thereafter...” This review period may well need revisiting, pending the outcome of the Housing White Paper.
8. Paragraph 4.28 – “We will continue to work with the other districts in the HMA to support and plan for unmet housing needs and other strategic matters, recognising the different stages of plan making which have been reached”. The share of Oxford’s unmet needs between OCC and SODC is unresolved. Thame Town Council does not believe you have demonstrated that you have engaged constructively and actively with Oxford in this matter. This is the approach the examining Inspector will expect you to have taken.
9. Paragraph 4.29 – “We will review our LP once Oxford City have adopted their plan to address their examined unmet need and ensure that our plan responds positively to this”. This is at best dooming the Plan to an early review over matters that could be resolved, now. The Oxfordshire Growth Board decided the allocation of Oxford’s unmet need, having taken into consideration the different stages of plan making each District authority had reached. SODC had agreed the evidence base the Growth Board used to make that decision. An agreement should be made with Oxford, now.
10. Policy STRAT3 – “During the plan period, provision will be made to help meet part of Oxford City’s unmet housing need for around 3,750 new homes. This is to be delivered in accordance with the spatial strategy which seeks to strengthen the heart of South Oxfordshire and is not identified at any one site or location”. If the growth is not allocated to any site, it is spread across all towns and villages. There should be a buffer applied beyond which development does not go without the need for a bespoke rapid public transport system. Oxford’s unmet need represents those working or wishing to work and live in the City. The Oxford-Thame bus service is currently inadequate in terms of travel time for the 16-mile journey and at peak times bus and car journeys regularly exceed an hour in length.
11. Paragraph 4.46 – “We support the development and delivery of a new Thames road crossing between Culham and Didcot Garden Town, as identified in Policy TRANS1. This crossing is required to support development proposed in the emerging South Oxfordshire Local Plan and allocated in the Local Plan for the Vale of White Horse and supported by the LTP by 2031”. Contained in this paragraph is a circular reference; the Plan is referring to itself.
12. Paragraph 4.62 – Strike out text “Land to the west... a buffer between an existing Scheduled Monument...”.
13. Paragraph 4.67 – Strike out text “Journey distances are short however...”.
14. Paragraph 4.67 “Employment centres, a primary school and a supermarket are all within an average of ten minutes” (sic) walk or public transport journey”. Given that considerable parts of Thame no longer enjoy public transport routes, we believe this is old research that should be revisited.
15. Policy TH1 – Thame Town Council welcomes this support for the Thame Neighbourhood Plan, and the positive approach taken in order to support and strengthen the Town’s social and economic future.

Housing strategy

16. The method of housing allocation for both the market towns and the large villages is unsound.
 - Regardless of the method of estimating housing need, or any calculated overprovision, allocation on the basis of the number of dwellings a location had at a point in the past is not strategic planning. This is in breach of the Strategic Environmental Assessment Regulations.
 - The allocations should be based on sites or discrete areas that have been subject to a thorough understanding of local capacity and constraints, followed by an adequate sustainability appraisal process that tests a number of reasonable alternative options in order to find the most sustainable strategy for the Plan.

17. Paragraph 5.1 – “One of our main objectives of this plan is to deliver new homes in places where people want to live and they can afford”. Yet you are not investigating if the homes proposed for the market towns and large villages are in the most suitable or sustainable locations. The houses delivered in Thame in recent years have been desirable to many but are affordable for too few local residents, even those who consider themselves affluent.
18. Paragraph 5.2 – “Sources of housing supply:
- Strategic allocations made in this plan;
 - Retained core strategy allocations;
 - Existing planning commitments;
 - Small scale (non-strategic sites) to be identified through NDPs or identified in this plan”
- The latter **are**, or rather should be, strategic sites. If you are telling us they are not, NP groups will have far less duty to respond to them. Your role is to allocate the strategic development across all of the market towns and large villages, following a sound sustainability appraisal process, as per paragraph 156 and 157 of the NPPF and by the Strategic Environmental Assessment Regulations. It is the function of NPs to fulfill identified strategic allocations. Should you wish to leave the detail to the NPs, as it appears that you do, you will need to allocate strategic development to areas of search within each NP area. Such growth would have to be finite, unique to each NP area (i.e., you cannot make discrete plan-making areas responsible for the unmet allocations from other discrete plan-making areas) and have been part of an adequate sustainability appraisal process.
19. Paragraph 5.9 – “Whilst the overall level of development required to support the existing and future needs of South Oxfordshire, and a proportion to assist Oxford City’s unmet needs amounts to 20,800 new homes, we are providing development to exceed this requirement. This provides additional flexibility to enable the management of our housing land supply trajectory going forwards and to respond to changing circumstances”. It does not appear that a comparison has taken place comparing this drastic over-provision of housing against reasonable alternative options through the sustainability appraisal process. It is noted though that the overprovision, when annualised, equals 1,066 homes. This is in excess of the 925 per annum homes tested and discarded as an option through your Sustainability Appraisal process. It appears that the overprovision has only been compared against a choice of delivery models, based on an arbitrary distribution methodology. The Local Plan will be found unsound.
20. Paragraph 5.12 – “In each of the towns of Henley, Thame and Wallingford we propose the provision of an additional 15% growth of housing stock... In previous consultations, we had considered 10% growth, but this was on top of Core Strategy allocations where these existed. The market towns have already collectively delivered 5% growth from the start of the plan period and we are planning positively for further growth over the remainder of the plan period. This will be delivered in accordance with the Policy H3 (sic)”. So – instead of 10% growth on 2011 plus Core Strategy allocations (4,875 + 775 for Thame) which equals 565 dwellings you consider we should take 731 (15% on 2011 alone). This is an extra 166 dwellings – so 452, instead of 286 - just because you think as Thame has delivered well until now, we should continue to deliver. This has not been subject to any assessment of capacity, or any allowance taken of constraints. A true capacity figure has not been tested against reasonable alternatives. This is not strategic planning and the Plan, if progressed in this way, will fail at Examination.
21. Paragraph 5.14 – “This 15% distribution process does not take into account of social, economic and environmental factors that may impact upon the ability of settlements to accommodate the amount of development that has been calculated. Similarly it does not take into account the availability of suitable and deliverable sites”. The allocation is untested. As covered above, you are not making allocations for strategic development as required by paragraphs 156 and 157 of the NPPF.
22. Paragraph 5.17 – “Development in the Larger Villages should be proportional, appropriate and dependent on existing infrastructure... A degree of development in the villages will help to support local services and facilities and result in a more sustainable distribution of development that would have a more balanced impact on infrastructure”. Why is this paragraph not within the Market Town

section? As per the market towns, the degree of growth allocated to each village is untested and is therefore, unsound.

23. Paragraph 5.19 – “If a NP does not progress... the Council will... allocate sites for housing... (using) the published SHLAA... This would be done by working with the local community and parish council”. You would then be working on an evidence base that would be approaching 5 years old. It will not take account of the development of allocations and windfall sites, changing traffic patterns, changes in local health and education provision, etc. You will need to refresh the SHLAA first.
24. Paragraph 5.27 – “This 15% distribution process does not take into account of social, economic and environmental factors that may impact upon the ability of settlements to accommodate the amount of development that has been calculated. Similarly it does not take into account the availability of suitable and deliverable sites”. Please see the response given to paragraph 5.12.
25. Paragraph 5.28 – “Some villages are constrained by factors such as Green Belt, AONB, and flood zones. In these villages a 15% growth may not be fully achievable. Other villages are unconstrained and can plan for more than a 15% growth”. Please see the response given to paragraph 5.12.
26. There appears to be little recognition of the possibility of significant expansion at and around Haddenham in Aylesbury Vale. The possibility exists of not only existing development proposals/promoted sites but also new emerging sites.
27. There is no recognition given to the village growth around Thame. There is not only allocated growth, identified through the Core Strategy but windfall sites brought through applications and won appeals. For example, Chinnor has permissions that will already grow it beyond its 15% allocation for growth. Thame is the natural centre for many services for Chinnor residents and the full impact of both planned and future planned and windfall growth is not yet understood.
28. The target for Thame is presented as a single, “target” figure. Yet we understand that the growth allocated through the 15% on 2011 dwelling stock method is a combined, group target. Shortfall in one town will be expected to be picked up in another.
 - This is impracticable in terms of ensuring sound neighbourhood plans, that should have a reasonable design life of 5 years;
 - It is also unsound as this method of allocation relies on assumptions around capacity that have not been tested through a sustainability appraisal process;
 - This, together with the similar method of growth assumed in the large villages must be revisited. It will not pass through examination;
 - The figure for Henley in particular is not believed, unless it assumes they will continue to work jointly with Harpsden.
29. The one-year deadline given for neighbourhood plan revision in paragraph 5.12 and other policies is inadequate, given the resources of neighbourhood plan groups.
 - It has taken over 4 years and 4 consultation events at the same plan-making stage, Regulation 18, for SODC to consider finally preparing a pre-submission plan. Yet Thame, a border town with duty to cooperate issues to consider with its neighbouring authority and parishes, evidence to gather, and allocations to propose is given one year to proceed through to examination with only a fraction of the resources available to the District.
 - This is unrealistic; it is arbitrary; it does not take account of the normal level of work involved in producing a NP, let alone the extra work required by the District and County abandoning their responsibilities. Where is the evidence that this is the correct time period to ensure a compliant neighbourhood plan would emerge that would not compromise the principles of the Local Plan?
30. Policy H1 – Delivering new homes – SODC should be aware of the recent case in which garden land in rural areas has been identified as being brownfield and is therefore now vulnerable to development as it is not in built-up areas. Dartford Borough Council vs SoS and ORS hearing held 9 March 2017. <http://www.bailii.org/ew/cases/EWCA/Civ/2017/141.html>. [The NPPF, paragraph 53 offers the opportunity to develop a policy to counter this change in the interpretation of law.](#)
31. Policy H1 – ii) “It is infilling within the existing built up areas of towns, larger, smaller and other villages...” Are conservation areas included within this part of the policy?

32. Policy H2 – New housing in Didcot – “At Didcot, provision will be made for at least 6,500 new homes...” Didcot, plus all other “at least” policy areas will require a maximum density per site. This will prevent speculative applications that are unrealistic in terms of the effect on the amenity of an area, plus will help reduce the risk of the provision or over-provision of mini-homes or similar homes for weekday rent.
33. Policy H4 – The word “minimum” should be removed from the policy, as should “collectively”. Subsequent strategic environmental assessments of sites, or other evidence may well significantly reduce the potential sustainable development at specific large villages. With the current wording it would fall to other larger villages to deliver any shortfall through planning applications as joint responsibility is implied. This should be changed to “~~A minimum of 1,122~~ A maximum of xx (the final agreed figure)homes will be collectively delivered through NDPs and Local Plan site allocations at the Larger Villages. Any shortfall will be met through reserve sites xx (insert list)where a 5-year supply of housing land is not available, or through a review of the Local Plan”.
34. Policy H10 – “A minimum of 500 new homes will be delivered in the smaller villages through NDPs, infill development, and/or small suitable sites of up to 10 dwellings.” The word “minimum” should be removed. In this case, SODC is effectively planning for windfall, without an appropriate assessment, as no evidence has been offered to suggest that the proposed growth will be likely to continue. A strategic approach is required, to ensure that sustainable levels of growth can be sought. This would permit protection for some of the smaller villages that would struggle to resource a neighbourhood development plan while maintaining an overall positive approach to development.
35. Policy H14 – Self Build and Custom Housing – “The Council will use its housing strategy and the evidence from the self-build register to identify appropriate locations for self-build and custom build projects.” When? The self-build register will be constantly moving; people can register interest in more than one area. “Specific sites will be identified through NDPs.” No. The Self-build and Custom Housebuilding Act 2015 and separate Government guidance is clear on what relevant bodies are for the purpose of the Act and Regulations. There is no onus on a NDP in helping deliver self-build or custom housing. This is because there is no expectation that NP groups hold serviced plots or similar land they can dispose of for housing, which the scheme relies on. The second sentence should be amended to “Specific sites ~~will~~ may be identified through NDPsneighbourhood planning groups working in cooperation with the District”.
36. Policy H18 – Please add text “...nor an important public or historically significant view spoil”. There may be heritage assets that “borrow” landscapes from adjacent land, such as the as the “borrowed landscape” enjoyed by the private house “The Elms” in Thame. Historic England noted the importance of this view, and how The Elms represented one of the last remaining edge-of-town private homes set in its original landscape, in the Country. There may be other similar examples of private views with national significance.

Housing need

37. It is not clear if the emerging Housing Strategy will define housing needs for older people to the level of the market towns or large villages.
- It will be essential to ensure the intelligence covers not just the demand by type (sheltered, extra care, retirement, adaption of existing properties) but the tenure. Older people will usually wish to remain in the communities they have become familiar with and it is vital that local people are not crowded out of the market by migrant retirees.
 - As Policy H15 is currently written, it would prevent Thame or any of the other market towns or villages from introducing a local occupier clause, similar to the existing housing strategy. Thame feels this would be yet another example of where we should work with neighbouring parishes, including those within Buckinghamshire. This would be with the intention of understanding the needs of the older populations of these areas, and to explore how we prevent a future imbalance of housing between age groups.
38. Policy H15 – “The Council will use its housing strategy to identify appropriate locations for specialist accommodation for older people. Specific sites will be identified through neighbourhood development plans.” The District-wide housing strategy may be at too coarse a grain to enable

local allocations to be made. Thame Town Council is keen to provide housing for older people for its local centre of gravity, but does not wish to become a net importer of older people in the same way it is seeking to avoid being a net importer of commuters.

Affordable housing

39. The share of affordable housing reserved for local people is criticised by local residents as being too low. The share, 20% of the 75% social rent works out as being too low a number, just 6% of a qualifying site; and no shared ownership schemes are reserved for locals. Frustratingly, the 6% is treated as a maximum. A suggested minimum threshold to make a significant difference in reducing the dormitory effect would be 30%, and apply this to shared ownership properties as well.
40. House prices within Thame are causing significant problems for new employers wishing to move to the area. They have reported to us their employees are unable to afford to move to the town and nearby area and are having to commute in to their jobs, often from distances that would be regarded as unsustainable. It is not believed that the usual policy response of increasing the amount of housing allocated to the Town in order to boost the supply of associated affordable housing will help. This is because the affordable housing supplied is still relatively unaffordable.

Meeting Oxford's unmet need

41. Thame Town Council questions the sustainability of placing Oxford's unmet need in Thame. Indeed, this strategy appears to undermine many of the objectives of the draft Local Plan, including Objectives 1.3 and 5.1. It can be argued that by dispersing Oxford's need to outer lying areas this aspect of the Plan is unsustainable. It is leapfrogging the Green Belt to less sustainable areas in terms of travel choice.
- Oxford City Council Head of Planning has publicly stated that Oxford City's unmet need must be met within a 12 mile radius of Oxford Town Centre. It is assumed this would be in association with rapid public transport. Thame is 16 miles from Oxford, and at peak travel times the most direct bus route takes 1hr 20 minutes to get into the centre of Oxford.

Employment

42. Objectives 3.1 – 3.3 are laudable but are not compatible with the Plan's strategy as it is clearly intended that Thame takes some of Oxford's unmet need in Thame, some 16 miles from Oxford. This is at least an hour's peak-time travel by car or public transport. This will undoubtedly boost out commuting and cause an imbalance in our housing/jobs ratio:
- Objective 3.1 "Improve employment opportunities and employment land provision, providing high quality local jobs to help retain more of its skilled residents in the local workforce"
 - Objective 3.2 "Support business growth... which provide the opportunity to reduce commuting distances"
 - Objective 3.3 "Support economic and housing growth are balanced, to support sustainable journeys to work".
43. We welcome the recognition that Thame has existing commercial stock and estates that are in need of regeneration for employment use.
- However, we are increasingly aware that the stock of employment land in Thame is not meeting the needs of local employers, let alone businesses hoping to move to the Town. Within our regular business forums we hear of employers at all scales from SMEs to multi-nationals who wish to remain local to keep their employee base but who are struggling to find premises to expand into.
 - We currently have no vacancies among decent properties, and nothing like the 10% figure for vacant premises generally acknowledged as being necessary to ensure a healthy employment base. Thame Town Council believes that vacancy rates in most sectors are near or at zero. This is especially true for town centre stock and small-medium enterprises.

Large companies are being forced to take up multiple small units in order to meet their floorspace needs.

- Permitted development and windfall development have robbed Thame of good quality, useable space. Through full planning permissions, loss of employment has been permitted despite the District's evidence documents stating no loss should be countenanced. We are aware of at least one landowner who wishes to demolish one of our larger industrial estates in favour of housing. It is vital that the District plans more effectively in order to manage the loss of employment. An assessment of the District's employment areas should be undertaken that identifies:
 - i. those sites best suited to reuse, with the presumption being land will not be released until replacement land and floorspace has been completed;
 - ii. those sites that require improvement, or renewal, with a commitment from the authority as to how they will help the owners undertake regeneration. No loss of these sites should be permitted;
 - iii. those sites that are meeting the needs of modern business and industry and require no intervention. No loss of these sites should be permitted.
 - The above approach represents a more strategic approach in planning for employment land in order to ensure a balance between jobs and employment opportunities and prevent out-commuting. This approach has been used in other authority areas and can be defended.
44. We have evidence that the population who have recently moved to the Town's new estates are moving from more expensive locations in the country, and are out-commuting. It is probable that the 2 ha extra allocated to the Town is not sufficient to provide for new employers who would bring new options for employment to help counter these unsustainable travel patterns. Through our NP review we will test the viability of strategies to ensure that local employment floorspace is linked in a proportionate way with our economically active population.
45. Policy EMP3 – Retention
- No comparison is made of the most suitable employment land against the worst; experience suggests the most attractive sites come forward first, especially in change of use or permitted development applications. This policy requires a condition to only allow the poorest of land to be proposed for redevelopment, backed by evidence based criteria. See comment 43, above.
46. Paragraph 6.30 – “[In addition, this local plan...](#)” The sentence is repeated in Policy; amend, or remove.
47. EMP10 – New employment land at Chalgrove – “[In addition to the strategic allocations at Chalgrove Airfield, at least 2.5 hectares of employment land will be delivered at Chalgrove](#)”. Avoid setting a minimum target; this will be challenged with developers assuming this will be to the limit the market can provide, rather than an assessed need. There is a risk Chalgrove will become a significant net importer of employees.
48. Paragraph 6.50 – It appears that the loss of visitor accommodation is taken more seriously than other businesses. Is this because all other matters are covered in the guidance note discussed in paragraph 6.27? Is this guidance note attached, or will it become supplementary guidance to the Local Plan?

Infrastructure provision

49. We are glad that the link between establishing sustainable communities and sustainable growth is given prominence within Objective 4.1.
50. Currently 620 dwellings have been granted permission, and are under construction or built from the 775 allocated to Thame through the SODC Core Strategy. There have been a further 250 windfall permissions and completions. Thame strongly suspects that community infrastructure may force a delay or slowdown in the future rate of delivery of housing. Support within a Local Plan policy would be welcomed for where identified bottlenecks such as health or education provision can be evidenced.
51. The Cattle Market site in Thame will be redeveloped within the lifetime of the next plan period. SODC is a willing landlord who will presumably offer the site following the end of the next lease in

2021. Essential to the future viability of Thame is the long-stay car park that provides essential business and shopping/leisure parking for the Town Centre. This site also offers a sequentially sound opportunity for extended retail facilities; evidence exists for the need for these retail allocations (see Town Centres and Retailing). Within the delivery of this project recognition must be made of the effect on the Town's vitality of even a temporary loss of long-term parking provided by the Cattle Market.

52. Paragraph 7.1 – “Improving accessibility to services and employment is fundamental to sustainable development and to meeting the objectives of this plan. The challenge is to do this in a way that minimizes the impact of the transport system on the environment and provides for necessary improvements in a cost-effective way”. It is essential to realise the pressure on the existing infrastructure in Thame from current levels of growth.
53. Policy INF1 – Infrastructure Provision – “New development must be serviced and supported by appropriate on-site and off-site infrastructure and services. Planning permission will be granted for developments where the infrastructure and services needed to meet the needs of the new development is already in place or will be provided to an agreed timescale. Infrastructure includes the requirements set out in the Council's IDP, any relevant made NDP, and/or infrastructure needed to mitigate the impact of the new development. The provision of infrastructure will be required to an agreed timescale”. What happens where a development cannot happen until (e.g.) a school or health facility is provided? A development providing one-third of a health centre might be constrained until the whole health centre is completed and fully running. Will planning permission really be withheld until the provision has been made?
54. Policy INF1 – “Types of community benefit could include improving skills levels of residents, the use of local labour in construction, promoting access to the jobs the development creates and/or the provision of skills training related to the type of new development”. These are ephemeral. Normal infrastructure provision is permanent; these skills could move away, the construction jobs are temporary. The gains from these benefits should not be overemphasised.
55. Policy INF2 – Thame Town Council are unable to support this policy without a definition of what SODC consider superfast broadband is. Please note that the Government measure of superfast differs from that of Ofcom. Many local authorities are specifying that developers ensure the higher Ofcom standard is the minimum adopted:
<http://researchbriefings.files.parliament.uk/documents/SN06643/SN06643.pdf>
56. Policy INF5 – Thame Town Council supports this policy.

Community and recreational uses

57. Access to certain community facilities is increasingly becoming a matter of concern. Thame's health facilities are, for example, at capacity. The importance of ensuring access to essential community services and facilities is welcomed:
- Objective 6.1 “... provide support to ensure NDPs are deliverable, achievable and sustainable”
 - Objective 6.2 “Provide access to high quality leisure, recreation, cultural, community and health facilities”
 - Objective 6.3 “Ensure all communities have access to the services and facilities they value, supporting the health and wellbeing of everyone”.
58. Policies CF1 and CF2 – Thame Town Council supports these policies.
59. Policies CF3, CF4 and CF5 – Thame Town Council supports these policies. We would however like to remind SODC that the Core Strategy identified in 2012 that Thame had a striking deficiency of 13.04 hectares for parks and gardens. Other insufficiencies include 4.58 ha of amenity greenspace and a two-badminton court-equivalent sports hall, among other things. In spite of sizeable allocations, there have only been minor increases in such provision, mainly through small locally equipped areas for play. Thame would like to work with the District in order to provide for further formal and casual recreation areas that are not subject to other uses such as agriculture.

Transport

60. Policy TRANS1 – “Ensure that the impacts of new development on the strategic and local road network, including the A34 and M40 are adequately mitigated”. This does not seem to include out-of-District/County schemes.
61. Policy TRANS2 – Thame Town Council supports this policy.
62. Paragraph 7.16 – “In NDP areas, it will be important to ensure that sustainable transport movements are incorporated into NDPs. These improvements will also need to be complimented by relevant and reasonable upgrades to surrounding highway networks to mitigate impacts of development”. What is reasonable? This is presumably development that can be mitigated?
63. Policy TRANS5 – “Proposals... where appropriate” (x2). What is appropriate? For example, surely the only thing stopping provision for the safe entry and egress of refuse vehicles would be heritage concerns?
64. Policy TRANS7 – Thame Town Council supports this policy.

Town Centres and Retailing

65. Thame Town Council welcomes the proposed allocation small/medium format convenience foodstore for Thame, it being in line with our own evidence base (Thame Retail Capacity & Impact Study, November 2015). An appreciable amount is not, however, required until 2025; development can coincide with the redevelopment of the Cattle Market site in Thame. This is the most sequentially preferable site available in Thame, being edge of centre.
66. A smaller amount of comparison goods floorspace capacity has been identified through our retail capacity and impact study. This suggests that by 2025 there will be a need for around 715 sq m of comparison goods floor space, rising to 1,800 sq m by 2031. This is much less than suggested by the optimistic studies undertaken for the Core Strategy, which was undertaken at the peak of retail growth. Thame will allocate land accordingly and may revisit some of our outstanding retail allocations and would welcome this need being reflected in Policy TC4.
67. The above comparison goods floorspace demand can be further justified by the fact we have zero vacancy for retail space of any size within our Town Centre, and are not aware of any vacant units that are available outside it. Local businesses and estate agents confirm that when a retail business announces closure no gaps in tenancy occur – the units are immediately re-let or sold.
68. Policy TC1 – Thame Town Council supports this policy.
69. Policy TC2 – Thame Town Council and Paragraph 10.10 – The Thame Retail Capacity & Impact Study, November 2015 identifies that convenience and comparison foodstore capacity will be available within Thame by 2025:
 - Including the population growth coming from the housing allocations there will be 657 sq m of convenience floorspace and around 715 sq m of comparison goods floorspace by 2025 (Tables 6.2 and 6.4)
 - This excludes any attempt to increase market share
 - It is recommended a deep discount supermarket of around 1,300 sq m net floorspace is allocated in order to help claw back leaked expenditure, while causing as little harm as possible to existing independents and national operators (paragraph 8.30)
 - The Thame retail study recommends ensuring any new foodstore is as close to the town centre as possible, to support linked trips with existing businesses (paragraph 9.4).
70. Policy TC4 – Please add text “Proposals for a smaller/medium format convenience/food store in the town will be supported. This should be located close to the existing Town Centre in order to support linked trips on foot to existing businesses and shops.” Suggest also adding “Proposals for new comparison goods floorspace in the town centre of up to 800 sq m by 2025 will be supported. The evidence for the provision of further comparison goods floorspace will be reviewed after 2025”.
71. Paragraph 10.14 – Suggest text “An appropriate site has been identified as part of the comprehensive mixed-use redevelopment of the Cattle Market site, but the current made Neighbourhood Development Plan excludes this use in its allocation. The review of the Neighbourhood Development Plan should consider the allocation of ~~at this or other town centre sites in order to deliver~~ a smaller format convenience store ~~at an appropriate location in the town.~~ The”

identified comparison goods floorspace will be directed to existing or new town centre retail allocation sites within the Thame Neighbourhood Plan.”

72. Policy TC6 and paragraph 10.22 – Please see point 29 above on the lack of justification for giving neighbourhood plan groups just one year in which to prepare a plan for submission.

Natural and historic environment

73. Thame Town Council welcomes the emphasis on protecting the natural and historic environment, as evidenced by the following objectives:

- Objective 7.1 “Protect and enhance the natural environment, including biodiversity, the landscape, green infrastructure and waterways...”
- Objective 7.2: “Conserve and enhance our rich and varied historic assets and their settings, celebrating these as some of our strongest attributes”.

We are becoming increasingly aware of the presence of hitherto-unknown archaeological constraints on the high ground around Thame. We are concerned that capacity assumptions are being made without any further assessment of constraints.

74. Policies ENV2, ENV3 and ENV4 – Thame Town Council supports these policies.
75. Policy ENV5 – Please note that there are outstanding green infrastructure items that still require delivery, from the Core Strategy. A deficiency was quoted in the Core Strategy of 13.04 ha of parks and gardens; 4.58 ha of amenity greenspace in “Thame South”; 2.9 ha of allotments; an equivalent 2-badminton court sports hall; one community hall; 3 rugby pitches (Open Space, Sport and Recreation Facility Assessment August 2008). SODC Green Infrastructure Strategy July 2011; SODC Leisure and Sports Facilities Strategy March 2011. The majority of these still require delivery.
76. Policy ENV6 – Thame Town Council supports this policy.
77. Policy ENV10 – Thame Town Council supports this policy.
78. Policy ENV12 – Thame Town Council supports this policy.
79. Policy ENV13 – “Development proposals should be located in sustainable locations and should be designed to ensure that they will not result in significant adverse impacts on human health, the natural environment and/or the amenity of neighbouring uses. The individual and cumulative impacts...will be considered when assessing development proposals”. This is laudable. SODC is, however, attempting to disperse Oxford City’s unmet need across the whole of the District. This is unsustainable by any measure; it will affect the quality of life of the dispersed individuals, and lead to unnecessary private vehicle use. This in turn will have an effect upon the environment and public health that should be mitigated either by the selection of sites that are serviceable by rapid public transport or sites that are much closer to the area of housing need.

Built Environment

80. Policy DES1, DES2, DES3, DES4 and DES5 – Thame Town Council supports these policies.
81. Policy DES7 – We suggest adding text: “Fully exploring opportunities to reuse existing buildings and land before committing to demolition and renewal”.
82. Policy DES8 – Check where the Gov. is on zero carbon... probably nowhere... might also need to talk about Code Level 4 and the WMS.

Climate change

83. Thame Town Council welcomes the recognition that flood risk will increase with climate change. We also welcome the recognition of the harm noise and light pollution cause.
- Objective 8.2 (sic, should be 8.1) “Minimise carbon emissions and other pollution such as water, air, noise and light, and increase our resilience to the likely impact of climate change, especially flooding”. Thame will be looking to preserve land through its NP renewal that assists with flood alleviation or mitigation.
84. Paragraph 8.53 – “Neighbourhood planning groups considering proposing development within areas of risk of flooding should apply the Sequential Test to the whole neighbourhood area. If necessary, the Exception Test should also be applied”. Agreed.

Monitoring and Review

85. Paragraph 12.1 – It is worth stating that monitoring and review processes are also essential in order to prevent the saturation of certain types of development, such as identified retail need, housing for older people, etc. This will be particularly important when using secondary documents such as the Housing Needs Strategy in order to set targets.
86. Economy table – Given the need to retain employment space demonstrated within the Employment Land Review and Employment Topic Paper the following course should be taken:
- Employment uses should be defined by use class order
 - The amount of employment land lost to other non-employment-generating uses should be zero, rather than “no target but annually assessed”. The exception being brownfield allocation sites.
87. Economy table – Gross weekly earnings of full-time workers – What would trigger an alert? Would it be levels dipping below, or rising significantly above the south-east and national average?
88. Climate Change table - 10% of energy demand from major sites... – How will this be effectively monitored? It is almost impossible to track output of renewable energy delivered on-site (the developer all too frequently declares they cannot estimate the predicted energy requirement until the site is under construction/completed).
89. Natural and Built Environment table – Net changes in the number of Listed Buildings, Registered Parks and Buildings, etc. – The title should be changed to “~~Net~~ Changes in the number of Listed Buildings, etc.”. Similarly, the target should be changed to “No ~~net~~ loss”. Otherwise you are stating that it would be reasonable to lose a heritage asset by type as long as an equivalent heritage asset by type was provided in its place. By their nature, these heritage assets are irreplaceable.

General

90. Please check all policy and paragraph headlines. There are inconsistencies in terms of capitals, colons and hyphens, etc.
91. Mention is needed within paragraph 1.17, or the accompanying diagram, of the Local Transport Plan.