



Project: Thame Neighbourhood Plan **Ref:** THP761
Title: Progress Note **Date:** May 2021
To: Graeme Markland **From:** Jon Herbert
Pages: 7 (seven)

Documents:

This progress note is accompanied by a series of papers which include:

- Draft Site Assessment Report and supporting Site Schedule (in Excel format)
- Draft Site Selection Report
- TNP1 Policy Review
- Review of Planning Applications against the policies within TNP1

In addition to these we have preparing and will shortly issue the following:

- Review of the Thame Green Living Plan and potential for incorporating objectives and actions as policies or projects within TNP2
- Review of employment and retail background material

You will also have noted that SODC has now issued the SEA Screening Opinion for consultation with the Environment Agency, Historic England and Natural England.

Focus of work to date (Site Assessment):

An initial meeting on TNP2 was held with SODC on Wednesday 28 April. A key point of discussion during this was the requirement within Local Plan policies for TNP2 to be submitted within one year of the Local Plan being adopted and with site allocations being clearly identified. If this target cannot be met then Local Plan policies enable planning applications to be considered ahead of TNP2.

SODC is well aware that this is a very challenging timeframe (and one that we might be able to meet – see below) but that the Local Plan policy does not give them much flexibility and thus good progress on TNP2 needs to be made.

The focus on our work to date has thus been on Site Assessment and Selection. The status of this being:

- We have reviewed all sites within the SODC SHELAA and those submitted through the Thame Call for Sites process. There are several outstanding queries on the status of sites with SODC and updates outstanding from promoters of those sites put forward

through the Call for Sites process. We also need an update from Oxfordshire CC on their landholdings and future intentions (see, for example, the future of Lord William's Lower School which was allocated in TNP1 but which has not come forward)

- We are also awaiting an update on housing requirements for Thame from SODC. Although the Local Plan establishes a figure of 339 new homes to plan for, there have been further completions over the past year as well as a number of applications that have come forward since the Local Plan was adopted, including a series of live applications due for determination later this month and next. If these were to be approved it would change the housing requirement for Thame and thus the quantum of land that would need identifying and allocating.
- However, the SODC Local Plan notes that the requirement is a minimum figure and, until we have confirmation on any changes to this, have undertaken the assessment in line with practice guidance.
 - The summary report and associated site schedule issued alongside this progress note outline that the assessment has followed guidance established by MHCLG and that prepared by Locality for use by Neighbourhood Planning Groups.
 - The suitability of sites is indicated through use of traffic-light colour coding. Those sites indicated as green are those which we suggest warrant further consideration as potential allocations. Those indicated as amber are also potentially suitable sites, but where challenges may need to be overcome. Those indicated as red are considered unsuitable.
 - The assessment has reviewed the status of the site (e.g.: has it been built out / is it still being promoted) and other factors such as policy and environmental constraints (as mapped in the summary report), as well as access to services and sustainable transport options. It has also drawn upon findings within the SODC landscape capacity study and assessment which assessed the potential for the landscape around Thame to accommodate change.
 - A total of 66 sites were assessed, of which:
 - 13 are rated as 'green'.
 - 13 are rated as 'amber'.
 - 40 are rated as 'red'.
 - We have taken the green and amber sites forward for further consideration, as set out in the draft report accompanying this progress note. This considered those sites against the vision and objectives for Thame to determine which perform best against these and thus might form the basis of allocations in TNP2. To assist with this process the spatial implications of the vision and objectives have been considered and illustrated by way of a series of concept diagrams included in the report and which are based around the following:

- Retain compactness with homes in walking (and cycle) distance of services and facilities
- Retain and protect sensitive environments, including floodplains, green corridors and nature conservation sites etc
- Retain and protect sensitive landscape areas (e.g.: the openness and ridgeline to the east of Thame)
- Retain the separate identity of settlements (e.g.: Moreton as a distinct place from Thame)
- Integrate new development areas with the existing built form, avoiding physical barriers that would lead to isolated, car-dependent places
- Being sensitive to conservation areas, built and natural assets
- Based upon the above, the Site selection report indicates that the following might be the preferred location(s) for new allocations:
 - For housing, the Cala site to the south of Thame, following the pattern of recent development established through TNP1, as well as 'completing' land at 'Reserve Site F' from TNP1
 - For retail (and other mixed uses) the Cattle Market site and, subject to the outcome of the current planning application, potentially land at Goodsons Industrial Mews.
 - For employment, land to the east of Thame adjacent to recent development that has come forward in line with TNP1.
- In addition to these, there are some other sites that might also be suitable, including smaller sites, and it may be that these could come forward through an approach to windfall. Indeed, the SODC Local Plan includes a large allowance for windfall within its housing trajectory. Policies in TNP2 could establish principles under which windfall might be supported (e.g.: reuse of previously developed land within the built-up area and compliance with design principles applicable in that location etc).

Next steps (Site assessment):

We suggest holding a workshop with you to review the outcomes of the work to date, which will also need to be updated in light of any outstanding queries from SODC and others (see above).

Further consideration will also need to be given to the 'achievability' of the sites, particularly in respect of the Cattle Market, which although allocated in TNP1, has not come forward.

Following the workshop with you we suggest preparing a set of summary information boards for consultation purposes (with the community and site promoters) outlining the process followed.

This will help provide a clear update on progress and direction of travel. Subject to the outcomes of this, conversations can then be had with the promoters of the preferred sites to help shape the nature of the allocations and which will inform the design guidance to be prepared for the sites.

Policy Review:

We have been through the policies contained within TNP1 to determine whether:

- They remain relevant and can be carried forward into TNP2.
- They remain relevant but need to be updated.
- They have been superseded by changes to national policy and or the Local Plan and can thus be removed from TNP2.
- They comprise 'land-use and development' policies or are rather projects / aspirations (but which are still important to include in TNP2 and can help direct any funding generated through CIL and / or other funding streams that partner organisations have).
- They have been implemented and thus can be removed from TNP2 (e.g.: site allocations having been built-out).

Alongside the above we have also reviewed planning applications submitted since TNP1 was made and how policies within TNP1 have been used / referred to in the decisions.

It is clear from the above that some policies have been used more than others (indeed, some do not appear to be referred to at all) and that there is scope to 'tighten up' some of the policies. In particular:

- There are cross-references between similar policies in different sections of TNP1 (e.g.: active travel) and these could be amalgamated, providing clarity for applicants and decisions makers.
- Equally, design is covered in numerous policies, but without being clear on the expectations for development. We suggest amalgamating these and providing greater clarity on what 'good design' looks like in Thame.
- Requirements in terms of housing mix are relatively flexible and place the emphasis on demonstrating a Thame housing mix on the applicant. This might not always deliver what is required in Thame. The recommendations of the Housing Needs Assessment to be prepared via the Locality support package will help provide clarity on housing mix, sizes and tenure types, which can be embedded into policy.
- Town centre use-type policies are complicated now given recent changes to the Use Classes Order, but there is still a requirement to plan-makers to demonstrate they have planned to meet requirements for town centre uses. The Town Centre policies in TNP1 could be streamlined to establish the intent for the town centre, with a second



policy on the Cattle Market site (if taken forward as an allocation) providing more detail on the expectations for that site.

A review of the Green Living Plan is currently being undertaken and will supplement the above, indicating how and where the objectives and actions identified in that might be incorporated within TNP2.

Locality:

An application was made to Locality from grant funding and Technical Support (Housing Needs Assessment) at the start of May. The status of those is:

- Locality has requested clarification on one of the cost items (an answer to which has now been provide) and it appears that grant funding will be approved.
- We understand that Locality has also been in touch in respect of the Housing Needs Assessment and that will be approved. The next step will be for Aecom to arrange an initial call with you to run through key areas of research for them to investigate and report back on in the report.

We were unable to apply for the SEA technical support package at the same time as the above as (a) only one package can be applied for at a time, and (b) confirmation is required from SODC that SEA is required before an application can be made. The current status is:

- Having now completed the necessary forms to enable SODC to prepare an initial Screening Opinion, and having received that, an application for SEA can now be made. The outcome of the Screening remains subject to responses from the statutory consultees, but it is clear that the full SEA will be required to support productions of TNP2.
- The making of an application to Locality for SEA Technical Support this week (w/c 24 May) should see this approved for commencement by late June.

Timeframe

The requirement established in the Local Plan for TNP2 to be submitted within a year of the Local Plan being adopted is a key driver, and is one that we have pointed out to SODC is difficult to meet (indeed, we are aware that the Town Council has made the same comments through the Local Plan process).

Efforts are being made to expedite the plan-making process although key requirements, such as the Regulation 14 process and the SEA, have an associated timeframe which cannot be shortened. We have suggested to SODC that, because of these stages, we may not be able to meet submission, but that the process of selection, testing of these through the SEA and Reg 14 consultation, should demonstrate significant progress.



In the interests of making as much progress as possible (but, at the same time, preparing a Plan that can stand up to scrutiny), the following steps are identified (though are subject to review, particularly in terms of the Locality support packages which are outside of our control, and which operate on a different timeline to that which we have suggested). This would see submission taking place after the one-year Local Plan timeframe requirement, but not long after this (by the end of January 2022). We do though think this is ambitious and need to plan review periods into this, as well as any Committee and sign-off processes the Town Council has.



		One-year after-adoption of SODC Local Plan									
		May '21	June	July	August	Sept	Oct	Nov	Dec	Jan '22	
SEA	Consultation on SEA Screening Opinion										
	SEA Screening Finalised										
	SEA support application to Locality (Aecom) made and approved										
	SEA Scoping (and consultation) - TBC by Aecom										
	Environmental Assessment and Report - TBC by Aecom										
SITES	Site review workshop and report updates										
	Consultation on site assessment / selection process										
	Prepare site design guidance										
HOUSING NEEDS	Draft Housing Needs Assessment - TBC by Aecom										
	Finalise Housing Needs Assessment - TBC by Aecom										
PLAN DRAFTING	Commence first draft of policy updates / new policy										
	Prepare general desing guidance for non-site polciies										
	Prepare draft TNP2 (including review)										
CONSULTATION	Prepare for Reg 14 Consultation										
	Reg 14 Consultation period										
	Review Reg 14 responses										
SUBMISSION	Prepare Submission verison Plan										
	Prepare supporting Submission documents										

Indicative programme through to submission. Subject to review, dependencies and confirmation of timeframes for Locality (Aecom) support packages.