# THAME TOWN COUNCIL NEIGHBOURHOOD PLAN (TNP2)

CONSULTATION STATEMENT
FEBRUARY 2024
VOLUME 4: REPORT OF
REGULATION 14 CONSULTATION



Thame Town Council

Thame Neighbourhood Plan (TNP2)

Consultation Statement: February 2024

Volume 4: Report of Regulation 14 Consultation



Thame Town Council

Town Hall

**High Street** 

Thame, OX9 3DP

www.thametowncouncil.gov.uk

# TNP2

# **Thame Neighbourhood Plan Review**

Consultation Report

Summary of Regulation 14 Consultation

January 2024

**Thame Town Council** 



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# 1. Introduction

The Regulation 14 consultation of the pre-submission draft Thame Neighbourhood Plan took place for a period of eight weeks between Monday 12th June and Monday 7th August 2023. This report presents a summary of the process followed and feedback received.

Consultation material was available to view online and in person:

- The Town Council website was updated to include news items announcing the launch of consultation, a series of summary display posters, links to the draft Neighbourhood Plan and all supporting documents (see Figure 1 and Figure 2).
- A video was made to introduce the role and purpose of the Plan, summarise the policy direction in this and invite feedback. The video was viewed more than 150 times (Figure 3).
- Five drop-in events were held at the Town Council offices during the course of the Regulation 14 consultation and which members of the Steering Group were in attendance at to answer any questions and walk people through the material as required (Figure 4).

Banners were displayed prominently around the Town Centre to inform people of the drop-in events (Figure 5).

The posters prepared to summarise the Neighbourhood Plan and displayed at the drop-in events are presented in Appendix A.

People were encouraged to provide feedback via an online survey which was also available in print format for those wishing to complete by hand (see Appendix B).

Notification of the consultation was sent directly (see Appendix C) to:

- Statutory consultees, as advised by South Oxfordshire District Council.
- South Oxfordshire District Council, in their role as a statutory consultee.
- Neighbouring Local Authorities and Parishes.
- Developers, including the promoters / agents of sites.
- Residents and other organisations who had responded to earlier consultation activities and said they would like to be kept notified of future events. In total, around 700 individuals were contacted.

A full list list of organisations notified of the consultation is presented in Appendix C.

It is to be noted that during the consultation period one of the site promoters prepared material setting out the benefits of their site. It is understood this was distributed to households living close to the largest of the preferred site allocations in the Neighbourhood Plan (land at Oxford Road), and thus sought to influence their response to the consultation. Whilst it is unclear how much of an impact this had, it is noted that some respondents to the survey did respond to say they preferred the alternative. The material distributed is not endorsed by the Town Council but is included in this document as a record of activities and to note that this may have unduly influenced responses to the consultation run by the Town Council. The material is presented in Appendix D.

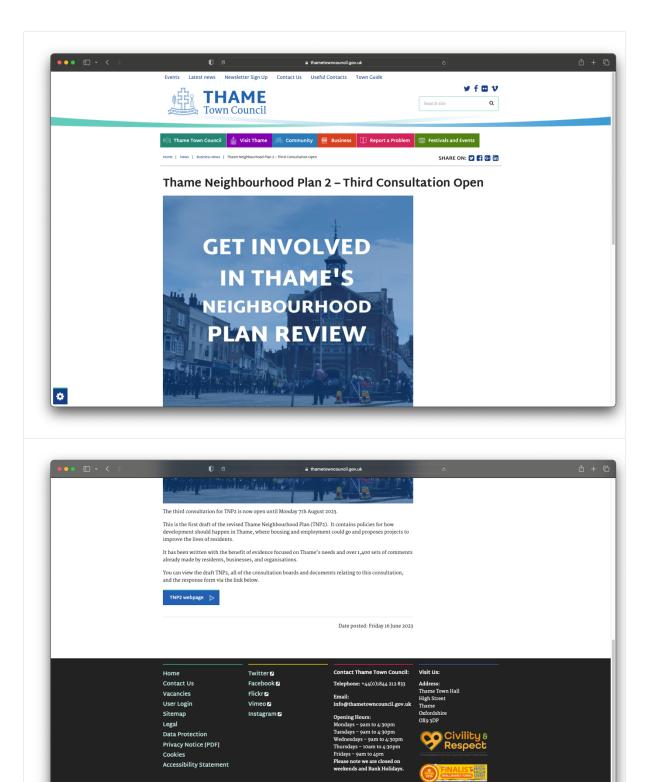


Figure 1: Screenshots of news item on the Thame Town Council website announcing the launch of the Consultation period

Site built by Connect 🗷



Figure 2: Screenshot of the consultation section of the Neighbourhood Plan page of the Thame Town Council website

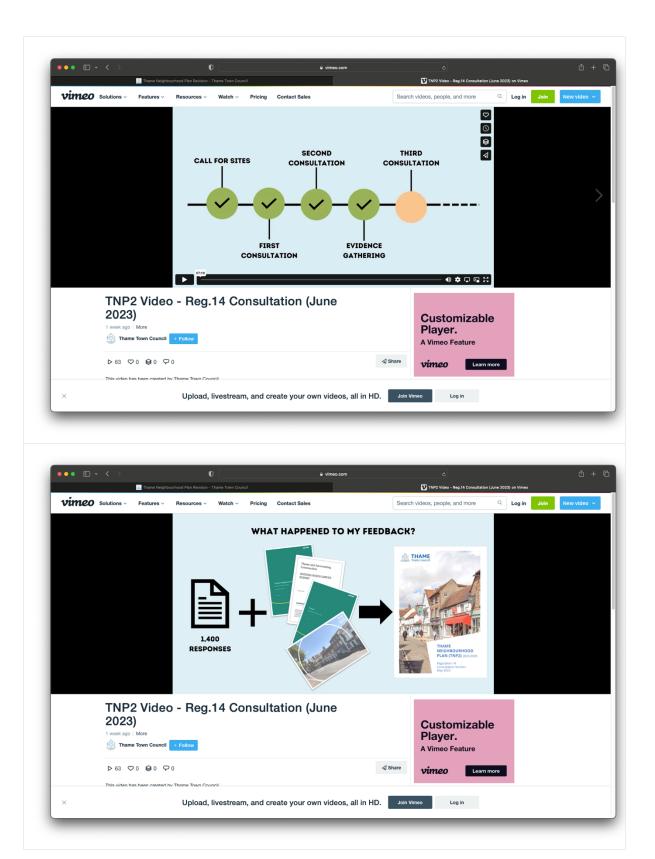


Figure 3: Screenshots of video prepared by Thame Town Council to communicate the purpose of the Neighbourhood Plan.







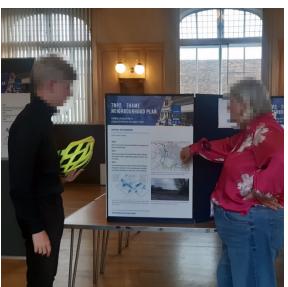


Figure 4: Selection of photos taken during the drop-in events. Faces obscured for privacy reasons.









Figure 5: Banners displayed around the town centre and at the Town Council offices advertising the consultation drop-in events

# 2. Response rate and headline messages

A total of 143 responses were received to the survey with a further 40 responses received in letter and email format.

Responses were received from a mix of residents, including people who live and work in the area, as well as from the statutory consultees, site promoters and other interested organisations.

In terms of responses to the survey:

- Not all expressed an opinion about all policies but, where they did, most
  policies were supported, with respondents expressing agreement or strong
  agreement to them (Figure 6). Those policies particularly well supported were
  those associated with sustainability and environmental measures. There were
  though three policies were more respondents said they disagreed than agreed,
  these relate to:
  - o Policies associated with proposals for 'windfall' housing development.
  - o The Cattle Market Site.
  - Approach to car parking in the town centre.
- There were also a small number of policies where opinion was divided and although more were in agreement than not, the level of disagreement was still relatively high. These relate to:
  - Land at Oxford Road.
  - Housing type, tenure and mix.
  - The approach to proposals for 'windfall employment proposals.
- A relatively high proportion of people responding said they neither agreed nor disagreed with policies. On average, and across all policies, around 20% of respondents did not express an opinion either way.
- If those who neither agreed or disagreed to policies are removed, we see that, on average, all policies received a 81.5% response in agreement or strong agreement (Figure 7). Policies noted above are 'outliers' and are addressed in following sections of this report.

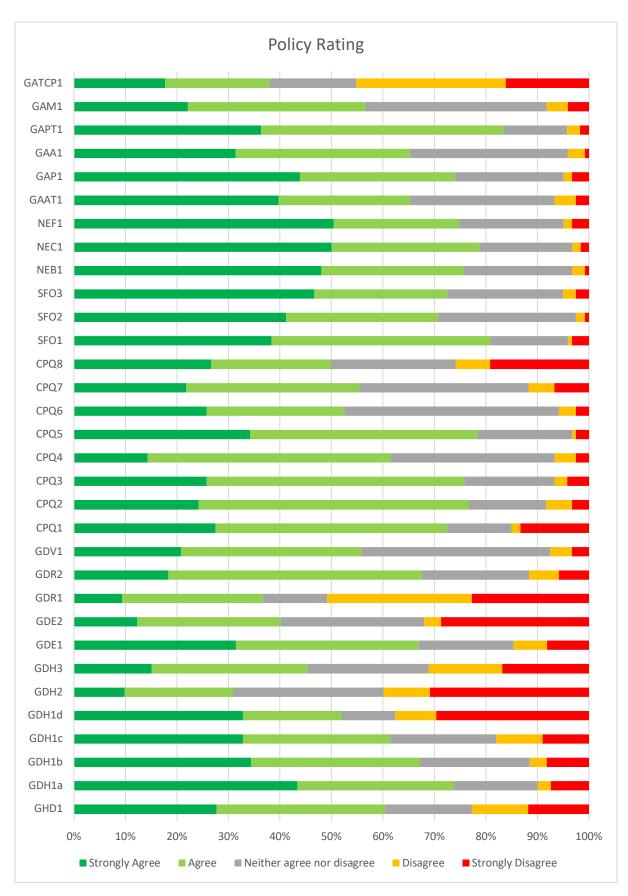


Figure 6: Chart displaying overall responses to each of the policies in the draft Plan

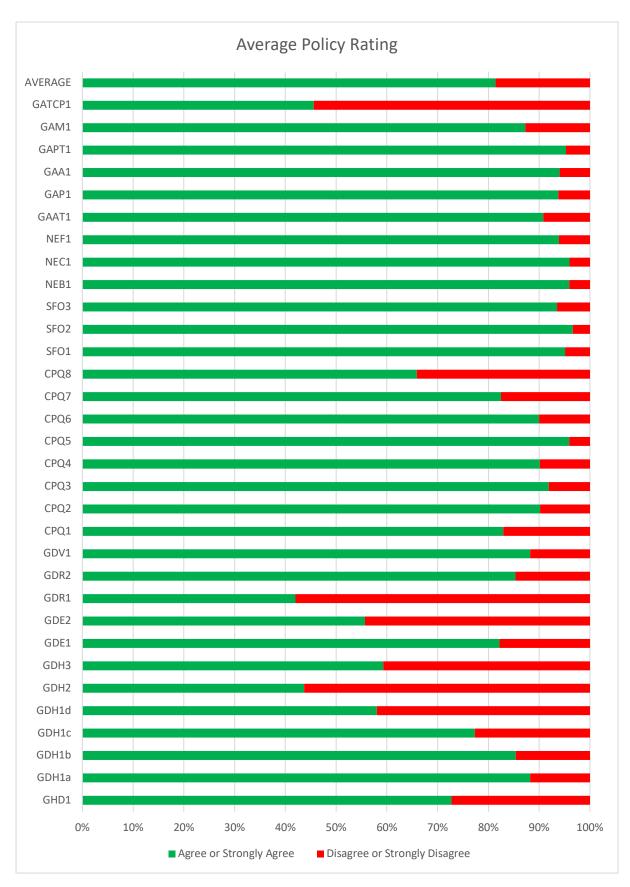


Figure 7: Chart displaying summary response to policies with those neither agreeing or disagreeing having been removed.

# 3. Comments on the policies

Comments made in response to policies are summarised below and presented according to the section of the Plan in which they appear. This includes comments made through the survey as well as those received by letter and email.

Responses made by the Steering Group to the comments received are presented in italics.

Comments from SODC and site promoters are summarised in the subsequent sections of the report.

# **Growth and Development (section 4 of the Plan)**

## >> Policy GDH1: Housing allocations

Of those who responded to the survey, 60.5% agreed or strongly agreed with the policy, around 17% said they neither agreed nor disagreed, and 22.5% either disagreed or strongly disagreed.

- Concern was expressed about the increase in housing on the Cattle Market in comparison to previous consultations which estimated that the site might accommodated around fifteen homes as part of a mixed-use development as opposed to the 45 now indicated.
  - Reference to 45 homes reflected more detailed design work undertaken in respect of the site and mix of uses it might be able to accommodate. However, this is to be amended to provide greater flexibility in the approach to design and development of the site. This is addressed further in respect of the Cattle Market site (Policy GDR1) below.
- Suggestion that alternative housing sites included in previous consultation events would be preferable.
  - The results of previous consultations indicated the sites allocated in the draft Neighbourhood Plan to be the preferred sites. This is supported by the Environmental Report prepared alongside the draft Neighbourhood Plan.
- Clarity was requested as to the number of new homes being planned for, which appears to exceed the overall housing requirement having taken account of recent developments.

- Ongoing monitoring of development completions and commitments has resulted in a change to the housing requirement or Thame. At the time of the Regulation 14 consultation this had been reduced from 339 homes to 256. Further updates as calculated by SODC in the emerging Joint Local Plan being prepared with Vale of White Horse District indicate that the requirement has fallen again to 143 homes, albeit over the period 2021 – 2041. Since the Regulation 14 consultation was undertaken the land south of Wenman Road has been granted permission and is counted as a commitment in the calculation of housing supply. The outstanding requirement is met through the allocation of land at Oxford Road, Windmill Road and Diagnostic Reagents. Accounting for changes to the Oxford Road site resulting from consultation feedback (as discussed below), these sites have the potential to accommodate approximately 155 homes. This is closely aligned with the housing requirement figure. In addition to these, it is recognised that there is potential for new homes to be accommodated on the Cattle Market site. However, and in order to allow flexibility through the design approach to this site, this does not count towards meeting the housing requirement figure (though will do as and when development takes place).
- OCC acknowledged reference to the requirement for archaeological evaluation in the policy and that this is acceptable.
  - This is noted.

## >> Policy GDH1a: Land south of Wenman Road

Of those who responded to the survey, around 73.5% agreed or strongly agreed with the policy, 16.5% said they neither agreed nor disagreed, and 10% said they disagreed or strongly disagreed.

- It is inappropriate to build on land that is in or close to the floodplain.
  - The extent of the development area is outwith areas of flood risk and wider policies in the Plan require provision of Sustainable Drainage (SuDS) in new developments.
- Development of the southern part of the site should be retained as public open space.
  - The policy notes that this area should remain undeveloped.
- Points of access into the main road should be minimised, with access for this site and the adjacent Diagnostic Reagents site shared if possible.

 This is noted and reflected in the policy for the adjacent site, with references to be made in this policy to and including reference to pedestrians and cyclists.

#### >> Policy GDH1b: Diagnostics Reagents

Of those who responded to the survey, 67% agreed or strongly agreed with the policy, 21% said they neither agreed nor disagreed, and 12% said they disagreed or strongly disagreed.

#### In terms of comments received:

- It was suggested that it would be preferable for access to the site to be from Wenman Road rather than via the network of streets through adjacent development
  - This is reflected in the Policy, though opportunities for links to the adjacent Wenman Road site should not be precluded and may be required depending upon junction design
- OCC note that the site is adjacent to a children's home and that development should not adversely impact on this.
  - o This is noted and will be reflected in text in the Plan.
- BOC note that the allocation is in close proximity to their site on Chinnor
  Road and that noise mitigation measures should be required by the policy. It
  notes that a condition was attached to the adjacent development on
  Wenman Road in respect of noise mitigation and that the Local Plan requires
  applications to be considered in terms of noise.
  - This is noted. Although the SODC Local Plan includes reference to noise assessments, the Neighbourhood Plan policy will be updated to include a site-specific criteria around noise for this site.

#### >> Policy GDH1c: Land at Windmill Road

Of those who responded to the survey, 61.5% agreed or strongly agreed with the policy, 20.5% said they neither agreed nor disagreed, and 18% said they disagreed or strongly disagreed.

- Concerns were expressed about the suitability of access to the site and impacts on the Phoenix Trail.
  - The comments are noted. The site benefits from a resolution to grant planning permission and matters associated with access and crossing of the Phoenix Trail are to be addressed through that. This includes a detailed junction design approved by OCC and Sustrans, and which

notes that the junction should be put in place before works on the site commenced. This will be referenced in the supporting text and Part 2a of the policy amended to refer to safe crossings.

- Concerns were expressed about the impact of the site on flooding.
  - Wider policies in the Plan require provision of Sustainable Drainage (SuDS) in new developments.

# >> Policy GDH1d: Land at Oxford Road

Of those who responded to the survey, 52% agreed or strongly agreed with the policy, 10.5% said they neither agreed nor disagreed, and 37.5% disagreed or strongly disagreed.

The spatial distribution of responses to this question is presented in Figure 8 and Figure 9. This indicates that, of those respondents based in Thame (Figure 8), the majority of respondents disagreeing to the policy are those living in close proximity to the proposed allocation. Responses were received from those based further afield too (Figure 9), comprising a mix of agents, statutory consultees and visitors to Thame.

- Development will cause traffic congestion (with some comments suggesting a second access to Oxford Road or the ring road might be needed).
- Development will impact on the quality and character of the meadows and Cuttle Brook Corridor.
- Development will increase the risk of flooding.
- Development will damage nature and the environment.
- Development will involve the loss of arable farmland.
- Development will impact on an area of archaeological interest.
- Development involves building on green spaces that the first Thame Neighbourhood Plan said should be retained.
- Development will impact on views and cause disruption to existing residents.
- The area suffers from noise pollution from the ring road.
- This part of Thame is already over-developed.
- Too many homes are proposed as part of the allocation.
  - All comments are noted. All sites subject to consideration through the process have challenges that need further assessment and consideration. The site is currently subject to a live application and

- issues associated with impacts on the meadows, Cuttle Brook Corridor, flooding and views etc are being refined through that.
- It is important to note that although the land subject to allocation is that land allocated as green space in the first Neighbourhood Plan, this is to be offset by a landswap with land that was previously identified for development but has not come forward, i.e.: Reserve Site C and the school expansion site. The proposed allocation seeks to retain the same overall quantum of open space but effectively provides this in a different location, i.e.: there is no net loss of open space. Development will also be subject to biodiversity net gain requirements and will provide opportunities for making improvements to the open space and Cuttle Brook corridor.
- The density of development is low in comparison to SODC Local Plan policy, being informed by the local context and seeking to respond to this.
- Feedback to consultation, including that from SODC, has been fed back through the masterplanning undertaken to inform the development quantum and design principles included in the allocation. Through this a reduced development quantum of 100 homes is envisaged, responding in particular to concerns around the setting of heritage assets and landscape.

It is also noted that a third of respondents who provided comments about this proposed allocation on the survey form also said that they preferred the 'alternative proposals' for land to the south of Thame proposed by the promoters of that site. The material prepared and distributed is presented in Appendix D. The high proportion of respondents referring to this indicates that it has influenced the Town Council's consultation. Previous consultation on potential allocations undertaken by the Town Council indicated preference for land at Oxford Road.

Other comments were also received in addition to those summarised above (which were primarily from residents):

- Historic England note that part of the site is currently subject to a live application and that although they haven't made formal comments on this the policy should emphasise the sensitivity of local heritage, including views of the listed farm building group as experienced form the permissive footpath to the east of the allocation, and positioning development so as not to obscure this.
  - This is noted and will be reflected in the masterplanning document and policy wording. This effectively reduces the scale of development within the eastern parcel, minimising impacts on the view come from Oxford Road out towards the surrounding countryside, and from the

- permissive footpath alongside the Cuttle Brook to the cluster of listed farm buildings adjacent to the allocation boundary.
- Buckinghamshire County Council note the site has potential to be open to views from the ring road and landscape beyond within Buckinghamshire and that account should be taken of the Aylesbury Vale Landscape Character Assessment.
  - The comments are noted. The masterplan and design work undertaken alongside the Neighbourhood Plan includes analysis of the site and context and has informed proposals that respond to these. However, reference to the landscape setting will be incorporated in the Policy.

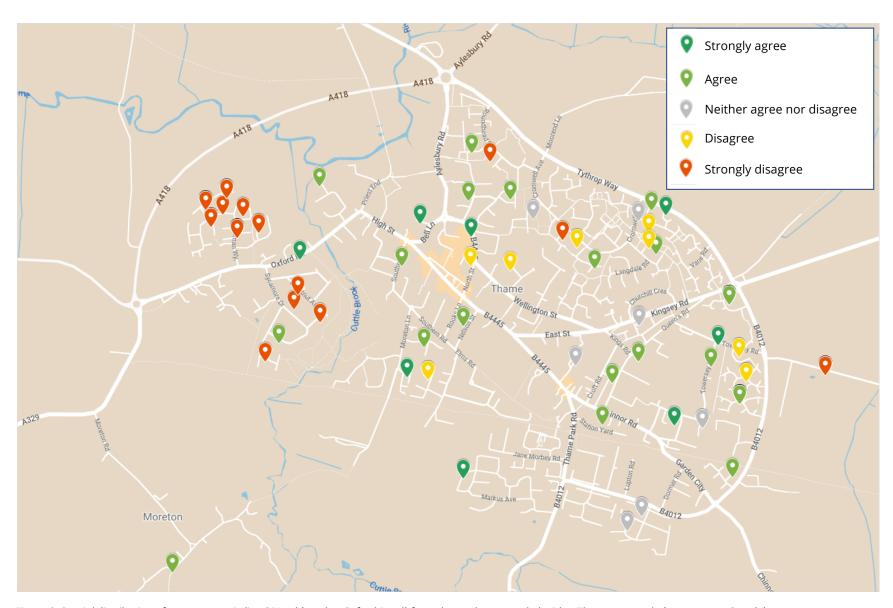


Figure 8: Spatial distribution of responses to Policy GDH1d (Land at Oxford Road) from those who responded with a Thame post code (map source: Google)

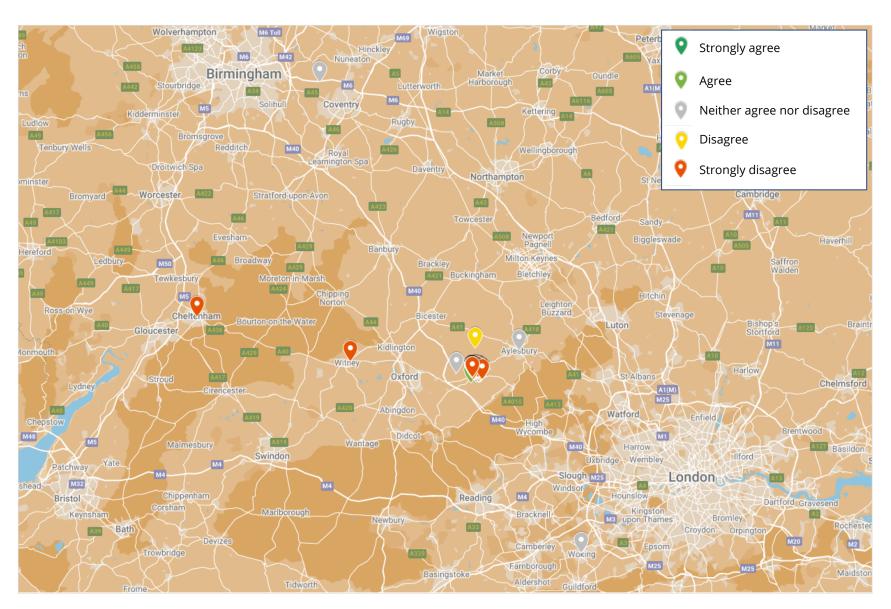


Figure 9: Spatial distribution of all responses to Policy GDH1d (Land at Oxford Road), including those with a post code beyond Thame (map source: Google)

#### >> Policy GDH2: Windfall housing criteria

Of those who responded to the survey, 31% agreed or strongly agreed with the policy, 29% said they neither agreed nor disagreed, and 40% said they disagreed or strongly disagreed.

In terms of comments received:

- The windfall policy is too relaxed and the three-year timeframe too short. This will allow development to come forward on unallocated sites, but there is no need for windfall given the allocations and amount of new development that has already come forward in Thame. As a minimum, the timeframe at the start of the policy should be extended to five-years as three-years is not sufficient time to bring forward the allocated sites.
  - The purpose of the windfall policy is to capture applications that are likely to come forward on other sites and thus helps TNP2 guard against those. However, some of the criteria within the policy are contained within other policies in the Neighbourhood Plan and also in the Local Plan. As an alternative to the policy, locally-specific criteria not already included in another policy are to be moved to Policy GDH1, forming a new part 1 to that policy and thus applying to all development, followed by the allocations. Reference to windfall can then be removed as these will be captured by GDH1 and other policies in the Local and Neighbourhood Plan. The policy will be renamed to recognise that it is an approach to housing and allocations.
- Notwithstanding the above, Historic England suggested that the policy should make clear that proposals should respond sensitively to the character and appearance of the Conservation Area.
  - This is noted.

#### >> Policy GDH3: Housing type, tenure and mix

Of those who responded to the survey, 45.5% agreed or strongly agreed with the policy, 23.5% said they neither agreed nor disagreed, and 31% said they disagreed.

- The policies should specify that at least 50% of all new homes must be deliverable, and that viability should not be a sufficient reason to allow fewer affordable homes.
  - The Neighbourhood Plan cannot establish an affordable housing requirement in excess of the SODC Local Plan policy. Comments on viability are noted though this is established through national and Local Plan policy.

- Where provided, sheltered housing should be located as close to the town centre and other supporting facilities as possible.
  - This is noted and is reflected in the policy as drafted which also includes reference to best practice principles for specialist homes.
- Policy should acknowledge changing demographics and thus the need for housing to be flexible to adapt to circumstances.
  - This is noted and is reflected in the policy as drafted.
- It was suggested that affordable homes should be separate from market housing because of the impact on housing values.
  - The policy reflects good practice in terms of requiring affordable housing to be well integrated with market housing and to design this to be of the same quality, supporting community cohesion and social inclusiveness.
- The required mix underplays the requirement for 1-3 bed homes and that the policy should require a greater proportion of new homes to be 1-3 beds.
  - The policy draws upon the Local Housing Needs Assessment undertaken which assesses demographic changes, the housing stock and affordability challenges (including access to mortgages, noting that many people can't afford to buy, but can rent, though there are also many lower income households struggling to afford rent too – and thus smaller, more affordable homes are needed in response to this) to establish the required future housing mix.

## >> Policy GDE1: Land at Rycote Lane

Of those who responded to the survey, 67% agreed or strongly agreed with the policy, 18.5% said they neither agreed nor disagreed, and 14.5% said they disagreed or strongly disagreed.

- The Local Plan requirement is for 3.5 hectares of employment land but the Neighbourhood Plan supports 5.5 hectares. It is suggested that the increase is not fully justified, is driven by external demand and will generate additional inward movement and congestion.
  - The requirement for future employment land is assessed in the Employment Report prepared as part of the Neighbourhood Plan, including a review of the market and employment change / losses and gains over the Plan period. It also indicates that the working age population of Thame has grown since 2011 and will continue to grow, but that employment land supply hasn't kept pace with this, risking

Thame becoming a 'commuter town'. The provision of additional employment floorspace will help rebalance this and help maintain the economic role and function of the town.

- The location is broadly supported, though the scale of development is considered too great (see above). It will be important to improve the quality of access (including road surfaces) and impact on views / landscape setting. The need for archaeological assessment is also noted.
  - Comments are noted. The design work prepared alongside the Neighbourhood Plan establishes principles that are intended to support delivery of a well-designed employment scheme that responds positively to its setting. The policy as drafted makes reference to access arrangements and archaeological evaluation. The quality of the road surface is outside the scope of the Neighbourhood Plan and is a point for discussion with OCC.
- It is important to include landscaping around the site that screens the development.
  - As noted above, design work alongside the Neighbourhood Plan indicates where areas of landscaping are to be provided.
- It was suggested that archaeological investigations may delay delivery of the site and thus impact on the need for employment land in Thame. Flexibility should thus be included to allow other land to come forward more quickly.
  - The draft plan included an approach to windfall which would help capture this, though it is noted that all sites in Thame are subject to potential archaeological interest. Responses to the windfall employment policy are set out further below (criteria from which are now to be incorporated into a general employment design principles policy).
- OCC note that the site is in close proximity to a safeguarded waste operation and that any proposals for development should not prejudice the safeguarding. OCC also noted that access into the site may be difficult.
  - This is noted and reference will be included to this effect, including the need to test access further through the planning application process.

## >> Policy GDE2: Windfall employment proposals

Of those who responded to the survey, 40% agreed or strongly agreed with the policy, 28% said they neither agreed nor disagreed, and 32% said they disagreed or strongly disagreed.

- The reference to the three-year period in the Neighbourhood Plan is insufficient and should be a minimum five-year period, otherwise it will allow other proposals to come forward in locations that are not appropriate, undermining the integrity of the Neighbourhood Plan.
  - This policy sought to capture applications that might be made irrespective of the Plan including allocations. The response is noted, though SODC and others also note that the timeframe is inappropriate. As an alternative, criteria are to be incorporated into the employment design policy within the Neighbourhood Plan, allowing for the windfall policy to be removed. The wider policies of the Local Plan will also apply.

## >> Policy GDR1: The Cattle Market Site

Of those who responded to the survey, 36.5% agreed or strongly agreed with the policy, 12.5% said they neither agreed nor disagreed, and 51% said they disagreed or strongly disagreed.

- There should not be a supermarket on the site. This will increase traffic and compete with the High Street. At the same time, some suggested that a new supermarket is needed but that this should be located on the outskirts of town.
- There is no need for a supermarket on the site given vacancies (the former Co-op store) on the High Street.
- Development will result in a loss of car parking, reducing visitors to the town centre and impacting on school drop-off and collection. There is a need to increase car parking in the town centre. The area of parking indicated for the supermarket is insufficient.
- Could an underground car park be explored?
- Ideas represent an over intensive form of development and impact on amenity of adjacent residential properties. Any development should reflect the character of Thame.
- Too many homes are proposed for the site, representing an increase over and above that envisaged in earlier consultation events.
- More of the site should be used for community uses, and with greater relationship with outdoor space to provide all-year round community events spaces.
- Some, though more limited comments, did support the idea of mixed use development, though noting concerns with regard to the scale of

development, and also welcomed areas of new greenery and community facilities. It was also suggested that, whilst ambitious, it raises expectations as to what might be delivered and should be scaled back accordingly. It would be better if the concept plan was not included in the Neighbourhood Plan.

- The policy is to be amended to make clear that the site should continue to provide for parking in the town centre unless evidence of utilisation and supply can be provided that supports the release of parking space. The policy will set out a range of uses that might be considered appropriate. Reference to the quantum of development for different uses are to be removed, allowing for flexibility and further testing to be undertaken through the site design and application process. Criteria for good design are to then follow after this, with reference to storey heights reviewed to better reflect context. The policy will also note that a large footprint superstore would not be appropriate for the site.
- The policy is thus to be reframed less as an allocation and more of a set of supporting principles. This will provide greater flexibility, though still embedding good design principles into the Plan. The supporting masterplan documents are to be updated to reflect responses.
- It is noted that some said that a supermarket in the town centre would impact on the vitality of existing businesses, but others suggesting that a superstore on the edge of town would be preferable, though this would also impact on the vitality of the centre. Alongside this policy, Policy GDR2 will be amended to include a clause to say that proposals for all retail development should, in the first instance, be directed to the town centre.
- The Royal Mail also asked about the long term parking strategy for the site and how space for their vehicles might be accommodated.
  - As a private business it is for Royal Mail to have their own strategy and business plan in place, including how they can best accommodate their own vehicles without relying on Council premises.
- OCC note that development should not cause adverse harm to use or amenity of the adjacent school and playing field.
  - This is noted and updates will be made to the Plan.

#### >> Policy GDR2: Town centre uses

Of those who responded to the survey, 67.5% agreed or strongly agreed with the policy, 21% said they neither agreed nor disagreed, and 11.5% said they disagreed or strongly disagreed.

#### In terms of comments received:

- It was suggest that a wider range of shops is required in the Town Centre for it to retain its vibrancy. It was also suggested that 'pop-ups', better public transport and other initiatives might be required to support town centre vibrancy.
  - Comments are noted, within the scope of what the Neighbourhood Plan can do, policies establish the mix of uses that are appropriate in the town centre. This includes encouragement for 'pop-ups'. Wider policies and aspirations in respect of accessibility and public realm improvements are also intended to help support the vibrancy of the town centre.
- The identification of secondary frontage was questioned given the use class order and changes to permitted development, and that, instead, the policy and associated diagram should simply refer to primary frontage.
  - This is noted, although the distinction between the two is to help retain the primacy of the main retail area, directing other sui generis uses to secondary areas. These include betting shops and hot food takeaways which tend to be located in town centres but which can have detrimental impacts on the viability and vitality of the main retail and service function of the centre. This will be clarified in the policy and supporting text.

## >> Policy GDV1: Visitor economy

Of those who responded to the survey, 56% agreed or strongly agreed with the policy, 37% said neither agreed nor disagreed, and 7% said they disagreed or strongly disagreed.

- It was suggested that the supporting text should make reference to the full range of events that attract people to the town.
  - The comments are noted and supporting text will be reviewed accordingly.
- It was also noted that that part 3 of the Policy duplicates (and in part conflicts with) but is less effective that SODC Local Plan policy EMP11. Clarity should also be provided as to how new development as opposed to existing development is to be treated.
  - Part 1 of the Policy makes reference to both existing development and new development, but could be split into two parts to make this clear. Existing part 3 to be removed to align with SODC Local Plan policy EMP11.

#### >> General Comments

Where comments were made not all specified which policy they applied to. These are summarised below:

- The overall scale of growth proposed in Thame is in excess of what is needed.
  - The housing growth figures are established in the SODC Local Plan based on assessments of need and testing of spatial growth scenarios across the District. The SODC Local Plan also requires new employment development to be accommodated in Thame. The uplift in the requirement for employment land compared to the Local Plan are based on assessment of the employment market and changes in Thame, including the need to offset the loss of businesses from the area.
- There is a need for more affordable shopping in Thame.
  - This is noted. Although the Neighbourhood Plan can set appropriate use classes for new development, and direct this to appropriate locations, it cannot say what businesses should occupy that space.
- Developers should fully meet the requirements of the s106 agreements before being allowed to develop elsewhere.
  - This is noted and a point of discussion for SODC and OCC.
- Thames Water provided an initial assessment of the impacts of the proposed housing allocations on the wastewater network and noted that, based on information available, do not envisage any infrastructure concerns in relation to the sites, but that they should be contacted at an early stage as and when applications for development come forward.
  - o The comments are noted.
- Buckinghamshire County Council queried to what extent additional traffic movements associated with the allocations had been assessed.
  - Although the Thame NDP is allocating sites, the quantum of development is that which the Local Plan specified should be accommodated in Thame and which was subject to assessments of transport undertaken for the Local Plan. Further site specific assessments will be required as part of any planning application as set out in Local Plan policy.

# **Character & Place Quality (section 5 of the Plan)**

#### >> Policy CPQ1: Design in Response to local character

Of those who responded to the survey, 72.5% agreed or strongly agreed with the policy, 12.5% said they neither agreed nor disagreed, and 15% said they disagreed or strongly disagreed.

In terms of comments received:

- The Character area map should be amended to correct the extent of Lea Park and East Thame shown on this. It was also suggested that the Plan needs to more fully recognise the historic growth of Thame and role that residents play in maintaining this.
  - The Character Area map will be updated to revert to the extent of the two areas identified through the character mapping undertaken for TNP1. The Thame Character Area Assessment and Design Code that sit alongside the Neighbourhood Plan include specific sections on the growth of Thame and the qualities of the historic core.
- Policy should specify a greater than minimum open space requirement for new homes.
  - The Local Plan establishes open space standards to be met and recommends development densities for new homes. The Neighbourhood Plan expands upon this by establishing design principles that require development to respond to local character.

#### >> Policy CPQ2: Design principles for employment development

Of those who responded to the survey, 77% agreed or strongly agreed with the policy, 15% said they neither agreed nor disagreed, and 8% said they disagreed or strongly disagreed.

In terms of comments received:

- It was suggested that the proposed Cattle Market allocation conflicts with the policy.
  - The development mix that might be suitable for the Cattle Market is different to that being addressed in this policy.

# >> Policy CPQ3: Town centre design principles

Of those who responded to the survey, 76% agreed or strongly agreed with the policy, 17.5% said they neither agreed nor disagreed, and 6.5% said they disagreed or strongly disagreed.

- It was noted that many existing buildings would not meet the criteria set out in the Policy.
  - This is noted. Should proposals for change and development come forward then policies in the Neighbourhood Plan would apply.
- It was questioned how this policy aligned with wider design criteria in CPQ1.
  - This is noted. All policies in the Plan should be read as a whole. Policy CPQ1 refers to the supporting character area assessment and design guide which includes information of relevance to the town centre.

#### >> Policy CPQ4: Self and custom-build housing

Of those who responded to the survey, 61.5% agreed or strongly agreed with the policy, 32% said they neither agreed nor disagreed, and 6.5% said they disagreed or strongly disagreed.

In terms of comments received:

- It was suggest that the policy is too restrictive and risks development being constrained, resulting in a lack of diversity.
  - The approach recognises good practice and will allow for design flexibility within parameters that contribute towards good placemaking objectives.
- It was questioned whether sustainable design and construction policies (CPQ5) apply to self and custom build.
  - o All policies in the Plan should be read as a whole.

## >> Policy CPQ5: Sustainable design and construction

Of those who responded to the survey, 78.5% agreed or strongly agreed with the policy, 18.5% said they neither agreed nor disagreed, and 3% said they disagreed or strongly disagreed.

- Although supported, comments suggested that the policy should go further and mandate standards that developers must meet.
  - This is noted. However, it is not within the scope of a Neighbourhood Plan to mandate sustainable design standards as Government has made clear this can only be set out at national level or in Local Plan policies. The Neighbourhood Plan instead makes clear that meeting such standards would be expected and strongly supported.
- It was noted that buildings could be orientated to consider solar gain and shading.

- o This is noted and reflected in the policy as drafted.
- Thames Water note that the area is designated as being 'seriously water stressed' and that the policy should therefore be updated to stipulate maximum water consumption levels of 110 litres per person per day in new homes must not be exceeded.
  - o This is reflected in amendments to the Neighbourhood Plan.

# >> Policy CPQ6: Street hierarchy

Of those who responded to the survey, 52.5% agreed or strongly agreed with the policy, 42% said they neither agreed nor disagreed, and 5.5% said they disagreed or strongly disagreed.

In terms of comments received:

- It was requested that technical terms in the supporting text be explained.
  - This is noted. The glossary will be updated.
- It was suggested that the Policy refer to the Local Cycling and Walking Infrastructure plan for Thame.
  - This is noted. At the time of writing there is no LCWIP for Thame, though it is acknowledged that this will be forthcoming. Reference to this to be added to the supporting text to the Active Travel Policy (GAAT1).
- OCC said that references to their street guidance should be updated to reflect the latest material.
  - o This is noted and updates will be made to the Plan.

#### >> Policy CPQ7: Parking in residential areas

Of those who responded to the survey, 55.5% agreed or strongly agreed with the policy, 33% said they neither agreed nor disagreed, and 11.5% said they disagreed or strongly disagreed.

- Comments supported the policy but suggested that it should stipulate parking standards associated with house sizes / bedroom numbers.
  - Parking standards are established by OCC as set out in the supporting text to the Neighbourhood Plan policy.

# >> Policy CPQ8: Paving of front gardens

Of those who responded to the survey, 50% agreed or strongly agreed with the policy, 24% said they neither agreed nor disagreed, and 26% said they disagreed or strongly disagreed.

In terms of comments received:

- It was suggested that the requirement for an application to be submitted for a dropped kerb would restrict the potential for he paving of front gardens and that efforts instead should be focussed on preventing pavement parking.
  - The requirement for an application for a dropped kerb would allow it to be considered on its merits. The overall intention is to minimise the negativities associated with the paving over of front gardens, which the application process can help support. The issue of pavement parking is acknowledged but is not within the scope of the Neighbourhood Plan. However, policies in the Plan do establish design principles for new streets and the integration of parking within development, which are intended to ensure the car is sensitively accommodated in these areas.

#### >> General Comments

Where comments were made not all specified which policy they applied to. These are summarised below:

- Where sites are subject to development, existing trees and hedges should be retained and integrated within the site.
  - This is acknowledged and incorporated in other Neighbourhood Plan policies.
- The Design Code could provide more detail on management and maintenance, and require communications infrastructure to be provided underground (as opposed to overhead cabling).
  - Comments are noted. Management and maintenance plans are typically subject to discussion with SODC through the application process. Provision of communication infrastructure is subject to separate permitted development rights, limiting the role of the local authority and County Council.

# Services and facilities (section 6 of the Plan)

## >> Policy SF01: Community facilities and services

Of those who responded to the survey, 81% agreed or strongly agreed with the policy, 15% said they neither agreed nor disagreed, and 4% said they disagreed or strongly disagreed.

#### In terms of comments received:

- Comments were made in respect of the need for additional healthcare
  facilities in the town and the impact of housing growth on school provision
  and catchment areas. It was also questioned whether the policy needed to
  make reference to a youth centre as plans are in progress for this.
  - Comments are noted. In terms of education, the Neighbourhood Plan reflects the position of the local education authority. In respect of healthcare, the policy allows for new facilities to be proposed. Delivery of such facilities is though complex and outside the scope of the Neighbourhood Plan. The SODC Local and Development contributions SPD sets out how and when contributions towards healthcare will be sought. Part 1 of the policy will be updated to include reference to healthcare facilities and the supporting text updated to comment on delivery of healthcare. Other opportunities, such as 'pop-up' or meanwhile use of vacant premises in the town centre for primary healthcare (or other highly accessible locations within the existing built up area) will be noted and supported.
- OCC welcomed clarification of the County's education provision in the Thame area and provided no further comments on this.
  - This is noted.
- Sport England and SODC both suggested an alternative form of wording for Part 3 of the proposed policy, bringing greater clarity and alignment with the Local Plan.
  - This is noted and appropriate amendments will be made to the Plan.

# >> Policy SF02: Existing open spaces

Of those who responded to the survey, 71% agreed or strongly agreed with the policy, 27% said they neither agreed nor disagreed, and 2% said they disagreed or strongly disagreed.

#### In terms of comments received:

 Retention of open space is supported, though suggested that the green space along the Cuttle Brook corridor should also be acknowledged on the open space plan.

- Separate and more detailed policies in the NDP specifically apply to the Cuttle Brook corridor.
- It was suggested that the map and policy approach in respect of open space at the Land at Oxford Road is confused and that development of this site cannot retain open space at the same time.
  - The map and text is to be updated to identify the Oxford Road allocation as a whole and note that any development here should retain a minimum of 17 hectares of open space as per TNP1. A different notation will be used on the mapping to differentiate it from other open space types.
- OCC request that land at the Thame Football ground is not identified as green space in the Neighbourhood Plan.
  - O It should be noted that the site is identified as green space, but is not designated as Local Green Space, and thus the stronger policy protections that would provide are not applicable. Instead, the Neighbourhood Plan simply makes clear this is a green space and where relevant provisions of the NPPF and Local Plan would be applied. No change is necessary.
- Sport England suggest that the Plan of open spaces included in this section should distinguish between playing pitches and open space to align with the NPPF.
  - o This is noted and maps will be updated.
- Historic England support leaving areas of archaeological importance as open space.
  - This is noted.

#### >> Policy SF03: New green spaces

Of those who responded to the survey, 72.5% agreed or strongly agreed with the policy, 22.5% said they neither agreed nor disagreed, and 5% said they disagreed or strongly disagreed.

- It was noted that, in respect of land at Oxford Road, development is likely to feature open space, but that simple design if this will not encourage people to use it.
  - This is noted; hence the criteria listed in the policy.
- Buckinghamshire County Council wrote to express support for the policy.
  - This is noted.

# >> General Comments

Where comments were made not all specified which policy they applied to. These are summarised below:

- Allotments should be provided and be accessible for use by community groups, elderly and younger generations, and potentially supporting a food bank.
  - This is noted. The requirement for provision of allotments is established in the SODC Local Plan.

# Natural environment (section 7 of the Plan)

# >> Policy NEB1: Biodiversity

Of those who responded to the survey, 75.5% agreed or strongly agreed with the policy, 21% said they neither agreed nor disagreed, and 3.5% said they disagreed or strongly disagreed.

In terms of comments received:

- Comments express support for the policy, but noting that any offsite
  provision of biodiversity net gains must be enforced, and that any run-off into
  the floodplain must be carefully managed. Comments also suggested that
  reference be made to incorporation of swift boxes in new homes as best
  practice and which could help with creating green corridors.
  - Comments are noted and reference to swift boxes etc to be incorporated
- It is suggested that applicants liaise with the Town Council as well as TVERC to identify appropriate locations should off-site provision be proposed.
  - This is to be noted in the supporting text.

#### >> Policy NEC1: The Cuttle Brook corridor

Of those who responded to the survey, 78% agreed or strongly agreed with the policy, 18% said they neither agreed nor disagreed, and 4% said they disagreed or strongly disagreed.

In terms of comments received:

- Comments said the status of the Cuttle Brook as a Local Nature Reserve needs fully recognising in the Neighbourhood Plan and supporting material (The Environmental Report). Some also said that it is a vitally important policy, but that more should be undertaken to retain and enhance biodiversity, including improvements to this from housing development.
  - Comments are noted.
- Comments supported identification of the Cuttle Brook corridor and provision of walking routes along this.
  - Comments are noted.
- OCC suggested some minor changes to the policy wording to provide clarity.
  - This is noted and changes are to be made as appropriate.

#### >> Policy NEF1: Flood risk and sustainable drainage

Of those who responded to the survey, 75% agreed or strongly agreed with the policy, 20% said they neither agreed nor disagreed, and 5% said they disagreed or strongly disagreed.

In terms of comments received:

- Comments questioned reference to the 8m buffer quoted in the supporting text. It was also noted that where provided close to homes, SuDS should be safe.
  - The 8m buffer is based on recommendations provided by the EA. The point about safety is agreed with and thus the policy in the points to use of local standards and guidance.
- OCC noted that policy should make clear that SuDS are a requirement of all major developments and inclusion is strongly advocated on minor development.
  - o This is noted and will be clarified in the Plan.
- Thames Water request that additional supporting text is added to make clear that developers must make proper provision for surface water drainage to avoid flooding of the foul sewer.
  - o This is noted and appropriate changes made to the Plan

#### >> General Comments

Where comments were made not all specified which policy they applied to. These are summarised below:

- Support was expressed for the proposed policies and supporting initiatives, including opportunities to add greenery and areas of biodiversity into the town. It was noted that the management and maintenance of such spaces is importance, and that greening could extend beyond trees and hedges to use of green walls and roofs too.
  - Comments are noted

# **Getting around (section 8 of the Plan)**

# >> Policy GAAT1: Active travel

Of those who responded to the survey, 65% agreed or strongly agreed with the policy, 28% said they neither agreed nor disagreed, and 7% said they disagreed or strongly disagreed.

In terms of comments received:

- Some comments make reference to the requirement for speed reduction measures (i.e.: 20mph).
  - This is noted though sites outside the scope of a Neighbourhood Plan.
- Several comments highlighted the importance of providing a high-quality cycle route between Thame and Haddeham.
  - This is noted. The route is included as a project in the Neighbourhood Plan to be developed further with partner organisations. Much of the route is outside of the Neighbourhood Plan area and thus outside the scope of the Neighbourhood Plan.
- Some comments note that recent cycle infrastructure is incomplete with gaps in the network, and which need connecting with the wider network of routes in the town.
  - This is noted. The policy notes that new routes should be well connected and integrated with existing routes. Outside of planning applications, improvements to the route network comprise a project for further development.
- It is noted that the supporting text could make reference to initiatives being developed by OCC, including a LCWIP for Thame, and that the ideas in supporting Project GAAT(a) are those which will be included in the LCWIP.
  - This is noted. Reference to the forthcoming LCWIP to be included.
- The policy should include a required for covered cycle parking, not simply secure parking.
  - o This is noted. Text to be updated in the Plan.
- OCC support the policy which is in line with their own transport policy. They
  note that point 1(b) should make clear that it is reduction to the active travel
  network that would not be supported. The response also notes that OCC has
  standards in respect of cycle parking provision that could be referenced in the
  policy.
  - This is noted. Text to be updated in the Plan.

- Buckinghamshire County Council wrote to express support for the improvements to walking and cycling routes between Thame and Haddenham as identified in the project associated with this policy.
  - This is noted.

# >> Policy GAP1: The Phoenix Trail

Of those who responded to the survey, 74% agreed or strongly agreed with the policy, 21% said they neither agreed nor disagreed, and 5% said they disagreed or strongly disagreed.

In terms of comments received:

- Access to the trail, at road crossings, is dangerous.
  - This is noted. Reference to improve crossing points to be added to policy.
- It was suggested that the Phoenix Trail should not be relied upon as an access into the town centre as it is not felt to be a safe route for people walking or cycling on their own. However, others suggested that it is safe and there is no need for lighting on the Trail which would undermine its qualities.
  - The comments are noted. The aspiration is to make the Phoenix Trail a safe and attractive route for everyone. Unobtrusive lighting is suggested in the policy to help address safety concerns whilst minimising impacts on the environmental character of the Trail. The policy will notes that lighting should be provided in accordance with best practice principles considering impact on biodiversity.
- Buckinghamshire County Council wrote to express support for the Policy and associated project to improve the quality of the Trail.
  - This is noted.
- Text in the associated project should be updated to reflect the Public Art Strategy for Thame. Similarly, the Wayfinding section should be updated to reflect the 'Art leading Wayfinding' project.
  - This is noted. Text to be updated in the Plan.

# >> Policy GAA1: Alleyways

Of those who responded to the survey, 65% agreed or strongly agreed with the policy, 31% said they neither agreed nor disagreed, and 4% said they disagreed or strongly disagreed.

In terms of comments received:

- OCC suggested that alleyways should be of sufficient width to allow walking and wheeling, and will not support alleyways that do not enable active travel.
  - This is noted. Text to be updated in the Plan.

#### >> Policy GAPT1: Public transport

Of those who responded to the survey, 83.5% agreed or strongly agreed with the policy, 12.5% said they neither agreed nor disagreed, and 4% said they disagreed or strongly disagreed.

In terms of comments received:

- There is a need for public transport to be improved across the town, particularly if there are to be any changes to parking arrangements. Delivery of improvements should be well-integrated with a park and ride, and the ongoing maintenance of waiting facilities.
  - The comments are noted.
- Use of the bus is not suited to all, including those with families and heavy shopping.
  - This is noted, but the purpose of improvements is to provide choice and opportunity to all.
- It was questioned what a frequent bus service is defined as.
  - Within the context of Thame, this is ideally one that operates every twenty – to thirty minutes, but which should also be supported by provision of live travel information and bus waiting facilities.

# >> Policy GAM1: Mobility hubs and EVs

Of those who responded to the survey, 56.5% agreed or strongly agreed with the policy, 35% said they neither agreed nor disagreed, and 8.5% said they disagreed or strongly disagreed.

In terms of comments received:

Provision of mobility hubs is considered a good idea and that they can
encourage people to use travel modes other than the car, though the
network of hubs across Thame will likely need to be extensive. It was
suggested that they should be convenient to use for people of all ages and
abilities, that they could include points for parcel deliveries to limit miles
driven by delivery vans, and that greenery and planting should be properly
integrated within the design of the hub. The hubs could also provide an
opportunity for people to make use of cargo bikes.

- Comments are noted. The policy will be expanded to include reference to parcel delivery and collection points, cargo bikes and addition of greenery.
- There was some concern that provision of the hubs would take away from car parking spaces and simply encourage people to travel further by car.
  - The idea of the hub is to support a move away from car travel to other modes for shorter journeys and thus help reduce the demand on parking spaces.
- OCC support the inclusion of this policy. A strategy on 'transport hubs' has been approved by Cabinet. The response suggests that the reference to mobility hubs should be changed to transport hubs for consistency with this. The County welcomes the opportunity to work with the Town Council on ideas for these hubs.
  - Support is noted. Having checked the most recent version of the OCC strategy, terminology has since switched back to use of 'mobility hub' as opposed to 'transport hub'. There is thus no need to amend the references to 'Mobility Hubs' in the Neighbourhood Plan.

#### >> Policy GATCP1: Town centre parking

Of those who responded to the survey, 38% agreed or strongly agreed with the policy, 17% said they neither agreed nor disagreed, and 45% said they disagreed or strongly disagreed.

In terms of comments received:

- The loss of the Cattle Market combined with any further loss of parking spaces in the town centre will reduce the ability of people to visit and park in the centre and thus harm the vitality of the centre. The reference to the survey from 2016 is out of date and with more homes now proposed the demand for parking is likely to increase. Rather than support a reduction of parking spaces, the level of parking should be retained, with some saying it should be increased.
  - All comments are noted. The Plan does not say that there should be a loss of parking in the town centre, but that evidence of use would need providing and alternative provision shown to be available. However, the policy and supporting text is to be reframed to acknowledge that parking is important to the vitality of businesses and ability of the town to serve residents, including those in outlying villages, but that is proposals to change parking provision is to be made, then this needs to be clearly justified.

- OCC indicated they are considering removal of some on-street parking bays in line with their transport strategy.
  - This is noted.

#### >> General Comments

Where comments were made not all specified which policy they applied to. These are summarised below:

- Some comments noted concerns about traffic congestion and impacts of this in the Town Centre but, at the same time, the parking should be retained and should remain free.
  - Comments are noted.
- The quality of public transport is poor and there needs to be better coordination between bus and train services at Haddenham & Thame Parkway station.
  - Comments are noted.
- The 'ring road' needs extending further south to remove traffic from the town centre.
  - Comments are noted.
- Support expressed for street greening and tree planting, as well as improved cycle routes and connections. More detail on these should be set out.
  - Comments are noted. Street greening and cycle routes are identified as projects in the Plan to be developed with partner organisations.
- The quality of pedestrian routes to and from schools need improving.
   Equally, cycle routes across Thame need to be safer for all, with the High
   Street and other roads adapt to incorporate safe cycling.
  - This is noted. Improving conditions for walking and cycling are incorporated in policies and projects in the Plan.
- The British Horse Society welcomes the Neighbourhood Plan but notes that
  opportunities should be sought that improve conditions for all vulnerable
  users, extending to horse-riders as well as pedestrians and cyclists, with
  routes designed accordingly.
  - This is noted. The Plan will be amended as appropriate, including reference to 'walking, wheeling and other non-motorised forms of travel'.

# Other comments

In addition to the comments outlined above, other comments were made as following:

- Natural England and The Coal Authority both responded to confirm they had no specific comments to make on the Plan.
  - The Steering Group takes the above to mean there are no issues with the Plan and thus they support its progress.
- Thames Water suggested that the Plan should: (1) include a new policy associated with the demands placed on new water / wastewater infrastructure by new development; and (2) include text associated with the need for technical assessments associated with sites close to sewerage works and the impacts of odour from these on development.
  - The Town Council considers that: (1) infrastructure associated with water / wastewater is appropriately dealt with through the SODC Local Plan; and (2) policies in the SODC Local Plan address issues associated with odour etc and, again, do not need repeating in the Neighbourhood Plan.
- Buckinghamshire CC asked whether screening under the Habitats Regulations had been undertaken and whether this considered the Aston Rowant SAC.
  - This was undertaken by SODC on behalf of the Town Council in May 2021 and concluded that an Appropriate Assessment was not required. The Screening makes specific reference to the Aston Rowant SAC.
- Buckinghamshire CC supported objectives in the Neighbourhood Plan in respect of flood risk and transport but suggest the transport objectives be extended to include reference to improving transport infrastructure where required in response to future planning applications, and that greater emphasis should be placed on extending walking and cycling networks beyond Thame to improve safety on those routes and better connect people.
  - This is noted. The Local Plan includes a requirement for transport assessments and for applicants to deliver infrastructure as appropriate. This will also be subject to the s106 and s278 process and does not need repeating in the Neighbourhood Plan. Comments are about extending cycle and walking routes are noted. This is referenced in the Plan and projects within it, though the scope of the Neighbourhood Plan to influence change outside of the Plan area is limited and is to be developed further with partners.

- Aston Rowant Parish Council wrote to note that the Plan and supporting material were well presented, highlighting the need to keep the character and appearance of the traditional market town, whilst identifying development potential within the Ring Road to avoid over-expansion.
  - The comments are noted.
- Tiddington Parish Council welcomed the focus in the Plan on connections
  with the countryside, the Cuttle Brook corridors, the approach to flood risk,
  retaining and developing Thame as a centre for surrounding villages.
  However, concern was expressed about the impact of development on both
  traffic (particularly on the route of the A418 to the M40) and on dark skies.
  - The comments and expression of support are noted. In terms of traffic generation, the quantum of development has been set in the SODC Local Plan and although the Neighbourhood Plan cannot plan for fewer homes it does include policies that seek to encourage a mode shift to more sustainable forms of transport and thus lessen the impacts of traffic growth. In terms of dark skies, the Neighbourhood Plan links through to the Thame Design Code which includes a section on street lighting and dark skies.

# 4. Responses from agents, promoters and landowners

Responses to the Neighbourhood Plan consultation were received from the agents / promoters of the allocated sites as well as sites not proposed as an allocation. These are summarised in this section. As before, responses from the Town Council are included in Italics.

# Land at Oxford Road

Savills, on behalf of Regenration Thame Ltd and Bloor Homes support the allocation of land at Oxford Road (Policy GDH1d), though suggest that some clarifications be made to the concept masterplan for purposes of consistency between the Neighbourhood Plan and associated Masterplanning Report. The response notes how the proposals for the site are aligned with policies in the Neighbourhood Plan. However, it is suggested that the approach to requiring a 50% discount on First Homes should be flexible to allow for the effects of viability to be considered.

Comments are noted.

# **Diagnostic Reagents**

JCPC, on behalf of the owners of the Diagnostic Reagents site (Policy GDH1b) support the allocation of the site. The response confirms the site is available and deliverable.

Comments are noted.

# Land east of Thame

David Lock Associates acts behalf of Hallam Land in respect of land to the east of Thame previously subject to consultation but not included as an allocation in the Neighbourhood Plan. The response supports and notes the importance of windfall policies in respect of housing (GDH2) and employment (GDE2), particularly given potential problems associated with deliverability and site capacity. Some minor wording changes to the policies are suggested. Support is also expressed for the housing type and mix policy (GDH3), particularly in respect of housing for an ageing population, but that the policy should be amended to note that this type of housing might also be accommodated on unallocated sites.

 Comments are noted. Comments on the windfall policies have also been made by SODC and others and will be considered accordingly.

# Land south of Thame

RPS acts on behalf of CALA Homes in respect of land to the south of Thame previously subject to consultation but not included as an allocation in the Neighbourhood Plan. The response supports the objectives with the Neighbourhood Plan and note that the housing requirement for Thame is a minimum. It is also commented that land to the south of Thame better meets the objectives of the Neighbourhood Plan than does land at Oxford Road which is allocated in the Plan and would provide wider benefits in terms of social, economic and environmental benefits. It suggests there are planning and delivery challenges associated with development of land at Oxford Road, and risks losing the benefits of development (e.g.: open space) provided as part of the first phase of development at Oxford Road.

 Comments are noted. The site has previously been consulted upon and assessed through supporting work to the Neighbourhood Plan, including the SEA. The ability to access the site has not been demonstrated.

# **WE Black Ltd**

A response on behalf of WE Black Ltd comments that the windfall housing policy (GDH2) effectively places a moratorium on housing proposals other than on the unallocated sites and that this is inappropriate given the housing requirement for Thame is a minimum. It also notes that the reference in this to major developments discriminates against smaller and medium sized developers and should be removed from the Plan.

 Comments are noted. Comments on the windfall policies have also been made by SODC and others and will be considered accordingly.

# **Blackditch Farm**

Satnam Investments, on behalf of WE Black Ltd seeks to promote land at Blackditch Farm, Chinnor Road, for allocation in the Neighbourhood Plan. It suggest that it is a sustainable location for housing, can deliver affordable housing at 50%, and accommodate employment uses. It does not consider land at Oxford Road (GDH1d) to be a sustainable location and that, because the site being promoted has not been tested in the SEA, that it has not considered all reasonable alternatives.

The site was considered through the initial call for sites. It was not recommended for further assessment, being removed from the main built-up area of Thame and distant from services and facilities. It is also to be noted that the site is also compromised by the presence of the oil pipeline and proximity to the BOC site.

# **Highfields**

Rectory Homes is promoting land at Highfields located between Thame and Moreton previously subject to consultation but not included as an allocation in the Neighbourhood Plan. The response comments on a number of policies within the Neighbourhood Plan, including:

- GDH1d, Land at Oxford Road: this is now being promoted for more development than initially envisaged.
- GDH2, Windfall housing: this needs to be more positively phrased and greater clarity provided as to the trigger points for considering windfall applications.
- GDH3, Housing type and mix: delivery of affordable housing and First Homes needs to reflect viability matters and the mix of housing sizes required is not considered to align with local needs.
- CPQ1, Design: the thrust of the policy is supported subject to suggested rewording to bring clarity.
- CPQ4, Self and custom build: reference to plot passports at the outline applications stage should be removed.
- SPQ5, Sustainable design and construction: this policy is supported
- NEB1, Biodiversity: this is broadly supported subject to suggested policy wording to bring clarity.
- NEC1, Cuttle Brook: this policy is supported.
- GAP1, Phoenix Trail: this is supported, as are projects identified in respect of walking and cycling routes
- GAPT1, Public transport: this is supported but suggests that walking distances of more than 400m from a bus stop should be considered.
- GAM1, Mobility hubs: this is supported

The response also comments on the SEA and questions why it has not considered the site they are promoting. They include an assessment of the site and seek to show how well it performs against the criteria in the SEA in comparison to other sites.

This site was considered in the initial call for sites. It was not recommended for further assessment, with the SODC Landscape Capacity study undertaken for the Local Plan saying it is unsuitable for development. Following feedback to initial consultation, the site was reintroduced for consideration and further consultation. Responses indicated a lack of support for the site and that the ability to access the site has not been demonstrated. It is not considered a reasonable alternative for testing in the SEA. Comments on other policies are noted.

# **South East Thame**

Representations are made on behalf of CEG and Taylor Wimpey in respect of land to the south East of Thame, effectively comprising land to the south of development along Wenman Road between the housing here and the Cuttle Brook corridor. It is linked to land at Wenman Road allocated at Policy GDH1a and which is supported by the response.

The response claims the SEA process is flawed as it has not considered their site as a reasonable alternative and thus doesn't satisfy the Basic Conditions. It says this should be rectified. The response notes that the site performs well against the objectives in the Neighbourhood Plan and is thus a sustainable site for development.

The response also expresses support for the allocation of the Diagnostics Reagents site (GDH1b) but question the suitability of access. If access is unacceptable it is suggest that the Council reconsider how and where development might be located.

Reserve Site C on Wenman Road is being taken forward through the Neighbourhood Plan. The remainder of the site was considered in the initial site assessment and not considered appropriate, comprising green space allocated for retention in the first Neighbourhood Plan, and where the s106 agreement notes that this is agricultural land with public access to be provided through it. It is not considered a reasonable alternative for testing in the SEA.

# **Land at Rycote Lane**

Savills, on behalf of the JM Castle Trust, support the allocation of land for employment purposes at Rycote Lane (Policy GDE1). The response notes how the proposals for the site are aligned with policies in the Neighbourhood Plan, though notes that some amendments should be mad to the concept plan to reflect the most appropriate location for provision of SuDS. It is also suggested that there should be some flexibility within the policy to allow for a scheme to evolve in response to the detailed design process and needs of prospective tenants.

Comments are noted.

# **Howland Road**

Stoford suggest that the requirement for new employment land in Thame is underestimated and that, to meet the actual requirement for employment, land in their control to the east of Howland Road should be allocated in the Neighbourhood Plan. It is suggested that their site performs better against the objectives than the land allocated at Rycote Lane for employment, specifically in respect of landscape impact, and that the site they are promoting would provide employment opportunities within walking distance for residents. It is also suggested that their site is better related to other existing employment uses in Thame. The potential for delivering

employment premises at the Rycote Lane site is questioned. The employment windfall policy in the Neighbourhood Plan (GDE2) is supported but considered this needs to be refined and that the three year timeframe stipulated in this is not evidenced.

 Comments are noted. Through the consultation exercises preference was expressed for land at Rycote Lane for employment purposes.
 Comments on the windfall employment policy are noted. This is to be updated as per comments above.

# The Cattle Market

SODC, as landowner, as opposed to local authority, provided comments in respect of the Cattle Market allocation. This notes that the terminology used should be updated and that the term concept is more appropriate than masterplan. The comments note that whilst the range of uses considered for the site seem appropriate, there needs to be sufficient flexibility to allow for this to be reviewed further through the detailed design and planning process. Linked to this, and notwithstanding the requirement outlined in the Local Plan, the comments noted that the inclusion of 1,500sqm of convenience retail may represent a risk to delivery of the site. It is also suggested that provision of the range of supporting community uses may require grant funding or other subsidy to help delivery.

The comments are noted and wording in the policy will be amended to provide some flexibility as to the final mix of uses to be incorporated on the site. The requirement for convenience floorspace is established by the Local Plan. A reduction in this may need to be evidenced through the application process, though policy wording could be amended to recognise this. Comments on wider responses to the Cattle Market site are presented above and a proposed amendments to this set out.

# 5. Response from SODC

This section summarises comments received from SODC, whose response stated:

'we found this to be a well-produced plan which contained a number of strong policies which reflected the vision identified for the parish'.

The response from SODC included a series of helpful and constructive comments in respect of policy wording and supporting text to help clarify and strengthen the policies. These are all noted and updates are to be made to the Plan as appropriate.

Comments were also provided in respect of the separate masterplanning document and Design Code that support the Neighbourhood Plan, as well as the SEA. As above, these are noted and appropriate updates are to be made to the documents.

In terms of allocations and other pertinent points:

- Policy GDH1b (Diagnostics Reagents): access to the site should be reviewed
  with OCC, with links through to adjacent areas of housing as opposed to
  directly onto Wenman Road explored. There may be potential contamination
  on the site associated with its former use. Landscape impacts may also nee
  considering as this comprises the last development parcel to the south east
  of Thame.
  - The comments are noted. It is noted that OCC has commented on all proposed allocations and has not raised access as an issue, but rather said that all sites will need to be accompanied by a TA or TS as appropriate depending on the quantum of development proposed. As noted earlier, the text is to be updated to allow for this and the adjacent Wenman Road site to be connected to allow for access between them.
- Policy GDH1d (Land at Oxford Road): The comments note that greater clarity is required as to why the proposed allocation area differs from that set out in the first Neighbourhood Plan, particularly in respect of open space, and that this should further draw out specific site constraints that need addressing by development, including those associated with heritage matters. The comments also ask for further clarity on housing figures split across the two proposed development parcels and the development densities associated with these. Suggestions were also made in respect of how the site boundaries and extent of development might be refined to better relate to heritage assets and the landscape setting, including views from Oxford Road and towards the cluster of listed farm buildings adjacent to the site. Other helpful suggestions were provided in respect of wording associated with clauses contained within the Policy.

- As noted before, the proposed allocation will not result in the overall quantum of open space being reduced, but will provide this in different locations, with that land previously identified as a reserve site and land for a school expansion being relocated on site and those locations now being identified as open space. The density of the site responds to local context. The heritage setting is to be considered further through the supporting masterplanning work and updates to text and policies made as appropriate.
- Policy GDH2 (Windfall Housing Criteria): the response recommends deletion
  of the first part of the Policy which includes the three-year trigger as this
  conflicts with the Local Plan, with Policy H1 of the Local Plan establishing the
  circumstances in which applications for unallocated sites will be determined.
  Amendments to policy wording to the remainder of the Policy are also
  suggested.
  - The comments are noted and reference to Policy H1 in the Local Plan is helpful. This will be referenced in the Neighbourhood Plan. It is proposed that Part 1 of the policy is removed and that remaining parts of the policy are amalgamate, as appropriate, into the main housing policy in the Neighbourhood Plan (GDH1) and design policy (CPQ1), such that the principles set out apply to all sites.
- Policy GDE1 (Land at Rycote Lane): The landscape impacts of the site, which is at a high point, and the mitigations associated with this, should be reviewed further.
  - The masterplanning work includes an assessment of views and landscape mitigations but will be considered in light of responses.
- Policy GDE2 (Windfall employment proposals): As per the housing windfall
  policy, the response recommends removal of the first part of the policy which
  establishes a three-year trigger which is in conflict with strategic policies in
  the Local Plan. Revised policy wording is suggested.
  - The comments are noted and changes to be reviewed alongside wider comments received through the consultation.
- Policy GDR1 (Cattle Market): The comments note that the potential for housing on the site is considered a complementary use and is not stipulated as a required use. As such, it cannot be considered to count towards the calculations of housing supply in Policy GDH1.
  - This is noted. The housing figures on the other sites amount to more than that required by the Local Plan in any event. Should the site come forward any housing delivered as part of it would count towards the housing requirement, which would then be recalculated accordingly.

- Policy SFO2 (Existing Open Spaces): The policy map associated with this and the allocation of land at Oxford Road are inconsistent and need to be clarified.
  - The comments are noted and changes to be made as set out above in response to other comments received.
- In addition to the above, SODSC advised that Policy HA4 (The Elms) of the made Neighbourhood Plan should be saved and included in TNP2. This is because the site benefits from planning permission but this has not yet been implemented. Retaining the allocation in TNP2 will 'save' the site and its contribution to the housing land supply in Thame.
  - The NDP will be amended to include a policy that 'saves' The Elms as a development site.

# 6. Summary

# Overview of process and responses

- Consultation on the Regulation 14 draft of the Thame Neighbourhood Plan lasted for eight weeks.
- Considerable efforts were made to advertise the consultation and encourage people to view the material and respond to this.
- Extensive use was made of social media, digital tools and in-person events to display the material and provide people with opportunities to respond.
- A wide range of organisations and other interested parties were contacted and invited to respond to the draft Plan. These included the statutory consultees, neighbouring Parish Councils, community, voluntary and social groups, developers, site promoters and agents. Furthermore, 700 individuals were contacted directly.
- There were 143 responses to the survey as well as 40 responses received by letter and email. These came from a mix of residents, statutory consultees, site promoters and other interested parties.
- Broad support was expressed for the majority of all policies and within the Neighbourhood Plan, particularly in respect of 'environmental' policies, including areas of new greenery, improvements to the town centre and ability for people to walk and cycle safely.
- There were though three policies where more respondents said they disagreed than agreed, these relate to:
  - Policies associated with proposals for 'windfall' housing development.
  - The Cattle Market Site
  - Approach to car parking in the town centre.
- There were also a small number of policies where opinion was divided and although more were in agreement than not, the level of disagreement was still relatively high. These relate to:
  - Land at Oxford Road.
  - Housing type, tenure and mix.
  - The approach to proposals for 'windfall employment proposals.
- Responses were received from site promoters and agents, most of which
  object to the ommission of their site as an allocation and that this needs
  reconsidering. Responses also suggested that some of the policies, including
  the approach to windfall and trigger points in this should be reconsidered.

• Comments from SODC and other statutory consultees were generally helpful and constructive.

# Overview of actions arising

Based on the comments received and responses to these outlined in the summary report, the main amendments for the Neighbourhood Plan are summarised as:

- The policy in respect of the Cattle Market is to be modified, specifying broadly what types of uses might be appropriate, but starting from the premise that parking should be retained unless a loss can be evidenced.
- As a consequence of the above, the potential quantum of homes from the Cattle Market is not to be included in the breakdown of housing supply.
- Clarification as to the open space requirements and approach to land swaps envisaged at land at Oxford Road, to make clear how this differs from TNP1 and why. Further review of heritage aspects and landscaping to be undertaken and reflected in the masterplanning and policy wording as appropriate.
- Windfall housing and employment policies to be removed but with Thame specific criteria amalgamated with other relevant policies within the Plan and which will apply to all applications (whether they are for allocated sites or otherwise). Wider SODC Local Plan policies will also apply in the event that any windfall applications are made.
- Policy in respect of town centre car parking to be reframed to recognise the important role this plays.

Other, more minor amendments to policy wording and supporting text, as outlined in previous sections, are also to be made to the Plan.

# **Appendix A: Posters**



# **WELCOME**

The first Thame Neighbourhood Plan (TNP1) was successfully made in 2013. It is now being reviewed and a new draft Neighbourhood Plan (TNP2) has been prepared.

The material presented here summarises the policies, and projects, in TNP2. These seek to build on the success of TNP1 as well as reflecting comments and ideas put forward in previous consultation events.

TNP2 includes land use and development policies that will be used to inform and determine planning applications across Thame. It includes allocations for new development.

Your views are now sought on TNP2.

Consultation is open until Monday 7 August 2023.

Please do let us have your views by then.

All the documents you need can be found on the Town Council's website, along with latest news, and a link to the online response form for your feedback.





TNP2 seeks to build on the success of the first Neighbourhood Plan, strengthening Thame's character as a 'real market town'

Figure 10: Summary display poster – page 1



# **VISION AND OBJECTIVES**

The vision is:

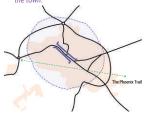
"Thame must maintain its character as a real market town"

#### This means:

- · Thame must continue to feel compact.
- Thame must continue to have a close relationship with the open countryside around it.
- Thame must maintain its markets, festivals and
- Thame must continue to act as a centre for the surrounding area not just its residents.

#### The objectives in TNP2 inform the preferred directions of future growth and other interventions. They are:

- 1. The compactness and walkability of Thame should be 2. The sensitive environment around Thame should be retained, with new homes within comfortable travel distance, by foot and by bike, from the town centre and other social and community facilities located around
  - respected, with areas of new growth avoiding areas of nature conservation and flood risk.
- 3. The landscape setting, quality of this and access to the green spaces and open countryside around Thame should be retained.



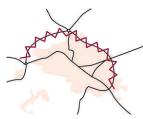
New housing development should help support social 5. inclusion, being well integrated with the existing built-up area of Thame and avoiding barriers to movement.



The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained.



6. New development should respect Thame's historic areas and past growth



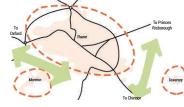




Figure 11: Summary display poster – page 2



#### **DEVELOPMENT REQUIREMENTS**

The South Oxfordshire Local Plan was adopted in December 2020. This establishes growth requirements that must be met in Thame, and states that land to accommodate future growth should be identified through TNP2.

The growth requirements are for:

- A minimum of 339 new homes. A review of planning permissions and homes built has reduced this to 256 new homes.
- A minimum of 3.5 hectares of land for employment (e.g.: office, manufacturing and distribution). Further work indicates at least 5.5 hectares of land should be provided.
- An additional 1,500sqm of convenience retail floorspace (shops selling everyday essential items), taking a 'town-centre first' approach to provision.

Identifying the preferred sites to meet these growth requirements has involved examining any site in Thame suggested by landowners or developers. These were considered against the vision and objectives for TNP2, comments received during past consultations and an assessment of other ways of providing the developments.

#### SUPPORTING EVIDENCE

The preferred sites and policies are supported by a suite of material including:

- a review of employment land requirements;
- an assessment of the qualities and characteristics of the built environment;
- a design code and concept masterplanning to influence the design of development; and
- a housing needs assessment to shape the mix and tenure of future homes that should be provided.







Figure 12: Summary display poster – page 3



#### SITE ALLOCATIONS

# Housing (Policy GDH1, and GDH1a - 1d)

TNP2 allocates land at the following locations for housing:

- · Land south of Wenman Road (60 homes)
- Diagnostics Reagents site (25 homes)
- · Land at Windmill Road (30 homes)
- · Land at Oxford Road (150 homes)

# **Employment (Policy GDE1)**

TNP2 allocates land at Rycote Lane for employment floorspace, including space for Small and Medium Enterprises (SMEs).

# **Retail and Town Centre Uses (Policy GDR1)**

TNP2 allocates land at the Cattle Market site for a mix of uses including retail, community uses, office floorspace, hotel accommodation and approximately 45 new homes.

The housing sites above amount to more than the requirement for 256 new homes in Thame. This recognises that the Local Plan figure is a 'minimum' and that a buffer is required to account for potential delays to site delivery that may arise.

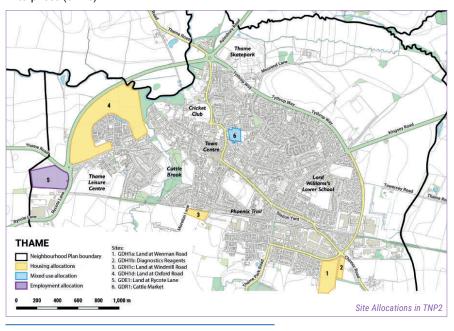


Figure 13: Summary display poster – page 4



#### **LAND SOUTH OF WENMAN ROAD**

#### **Housing**

This site is allocated for approximately 60 homes. It benefits from a resolution to grant planning permission. It was identified as a 'reserve development site' in TNP1. It comprises an extension of the housing development to the west that was allocated in, and has been built since, TNP1 was prepared.

The layout of development, arrangement of space and provision of open space shall follow that established in development to the west.

#### **DIAGNOSTICS REAGENTS**

#### Housing

This site is allocated for approximately 25 homes. The form of development should reflect that on the adjacent sites south of Wenman Road.

Both sites shown here shall provide new tree planting and cycle routes along Wenman Road, including safer crossings on the Chinnor Road roundabout, connecting to adjacent homes and employment areas.

Open space to the south shall be retained, providing views across the Cuttle Brook corridor and to established woodland.



Figure 14: Summary display poster – page 5



#### LAND AT OXFORD ROAD

#### **Housing**

Land at Oxford Road is allocated for approximately 150 homes, split equally between development parcels to the East and North-west.

This would become an extension of the Thame Meadows housing scheme allocated in TNP1. The form and pattern of development should integrate well with that. Development shall be sensitive to the setting of and views along the Cuttle Brook corridor, and retain land subject to archaeological interest as open space.

Landscape screening and noise mitigation measures are required along the A418 with new tree planting, green spaces, play areas and flood mitigation measures incorporated within the development.

Routes that support walking and wheeling shall be provided, connecting with open spaces, the town centre and other nearby facilities.



Figure 15: Summary display poster – page 6



#### LAND AT WINDMILL ROAD

#### **Housing**

Land at Windmill Road is allocated for approximately 30 affordable homes. The site benefits from a resolution to grant planning permission for a Thame Community Land Trust scheme that would provide affordable homes for people with a local connection.

Development should be accessed via Windmill Road, be structured around a central street with homes fronting onto this, and with green space distributed across the site.



Concept masterplan for land at Windmill Road

# LAND AT RYCOTE LANE

#### **Employment**

A gross area of 7.8 hectares of land is allocated for employment purposes and which includes areas of landscaping, new and retained tree planting.

Proposals for light industrial, manufacturing and distribution, as well as space for Small and Medium Enterprises (SMEs) will be supported.

Development should be carefully sited to minimise the impact on views across the landscape, with buildings being no more than two storeys in height (or one storey for large footprint buildings).



Concept masterplan for land at Rycote Lane

Figure 16: Summary display poster – page 7



#### THE CATTLE MARKET

#### Mixed-use

The Cattle Market was allocated in TNP1 and is retained in TNP2. The exact mix of uses will be determined through the detailed masterplanning and planning application process. Suitable uses include:

- · Convenience (everyday essentials) retail
- · Civic / community facilities
- · Office floorspace
- · Hotel accomodation
- Homes

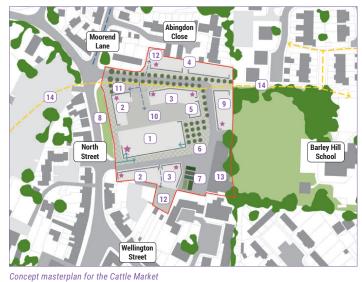
The layout of development shall allow for retention of the Racquets Club and successfully integrate this within the scheme.

Development must respond well to the scale and character of surrounding development, including the conservation area.

New homes may be provided on the upper floors of a mixed use development where they complement ground floor activities.

Streets and spaces within the development shall be well overlooked. Tree planting and new areas of greenery shall be incorporated within the layout of development.

Proposals that involve the loss of car parking will need to show that alternative space is available elsewhere.



- 1,500sqm supermarket with residential above
- 2 Ground floor retail with residential above
- (3) Residential
- 4 Residential
- 5 Community hub
- 6 Multi-functional square
- 7 Food growing space
- 8 Landscaping along North Street frontage
- Flexible building space for civic or cultural uses
- 10 Commercial / retail car park
- (11) Visitor car park
- 12 Residential car park
- 13 Retention of Racquets Club
- 14) Walking routes to facilities and services

www.thametowncouncil.gov.uk/tnp2

Figure 17: Summary display poster – page 8



#### **GROWTH & DEVELOPMENT**

In addition to the site allocations TNP2 also includes the following policies:

#### GDH2:

Proposals for windfall housing development (sites not allocated) should meet a range of criteria, including proximity to local services and facilities.

#### GDH3:

New housing development should provide a range of house types, sizes and tenures that meet local needs, including affordable housing, prioritising delivery of 1-3 bed homes, and homes for an ageing population.

# GDE2:

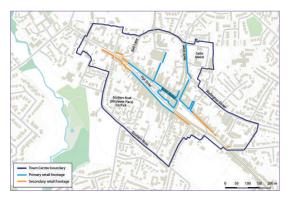
Proposals for windfall employment development should integrate well with the built form, complement neighbouring uses and minimise traffic impacts.

#### GDR2:

A range of retail and other supporting uses are encouraged in the town centre, with active uses at ground floor level. Mixed use schemes should be designed to avoid conflicts between uses.

# GDV1:

Proposals for uses that support the tourism and visitor economy will be supported. The loss of existing uses will be resisted.



Proposals for new development and uses in the town centre should support the vibrancy and vitality of the High Street and reinforce the main retail areas.



New housing proposed in Thame should provide a mix of house sizes, types and tenures that reflect local needs

Figure 18: Summary display poster – page 9



#### **CHARACTER & PLACE QUALITY**

Draft policies include:

#### **CPQ1**:

Proposals for new development should reflect good design principles and the best qualities of the local area as set out in the Thame Design Code and Character Area Study.

#### CPQ2:

Proposals for new employment development should reflect good design principles in respect of access, frontages, arrangement of uses, parking and servicing areas, and relationship with surrounding uses.

#### CPQ3:

Proposals for development in the Town Centre should reflect the historic growth of the town, reinforce the quality of the High Street, and be designed with flexibility in mind, allowing for change over time.

#### CPQ4:

Proposals for self- and custom-build homes are supported where they are subject to an overarching masterplan and set of design guidelines establishing the parameters for development.

#### CPQ5:

Development should meet high energy efficiency standards.

#### CPQ6:

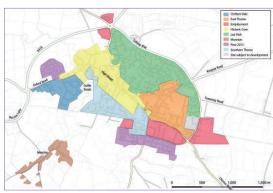
Where development includes new streets these should support safe movement for people of all ages who are walking or wheeling.

#### CPQ7:

Residential car parking should be well integrated within new development.

#### CPQ8:

Front gardens should retain areas of greenery.



A set of character areas have been identified across Thame, each with their own defining qualities and features. Proposals for new development should respond positively to the best qualities of each area.

Figure 19: Summary display poster – page 10



# **SERVICES & FACILITIES**

Draft policies include:

#### SF01:

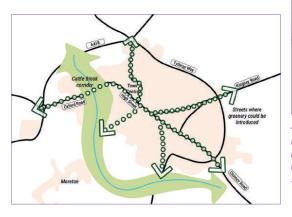
Support provision of new community facilities, resist the loss of existing facilities, and support improvements to these.

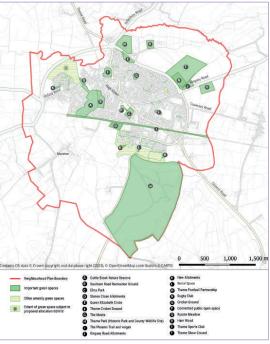
#### SF02:

Protect existing open spaces from loss and support diversification of these spaces to support opportunities for new areas of biodiversity.

# SF03:

Provide new amenity green space in development and design this to enable use and enjoyment by all ages.





Above: Policies in TNP2 protect green spaces from development

Left: TNP2 supports a street tree planting and greening programme,
making better use of street verges and unused space, and introducing
raingardens and wildflowers that enhance biodiversity and help manage
surface water flood risk.

Figure 20: Summary display poster – page 11



#### NATURAL ENVIRONMENT

Draft policies include:

#### NEB1:

Retain and protect important habitats and support net gains in biodiversity.

#### NEC1:

Retain and enhance the Cuttle Brook Nature Reserve and wider corridor, supporting access for leisure and recreation.

#### NEF1:

Avoid development in areas of flood risk and require mitigation measures to new development, including sustainable drainage, to reduce the risk of flooding.

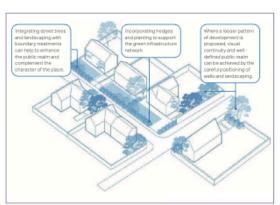
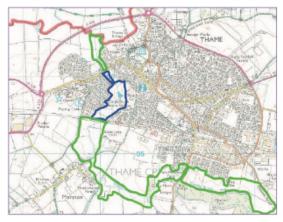


Image from the Thame Design Code (which sits alongside TNP2), showing trees and landscaping that complement the public realm and help create a sense of place



Policies in TNP2 seek to retain and protect the Cuttle Book Nature Reserve (outlined in blue) as well as the wider corridor (outlined in Green).



View looking north from the Cuttle Brook corridor at Oxford Road showing the green connection to the surrounding countryside.

Figure 21: Summary display poster – page 12



#### **GETTING AROUND**

Draft policies include:

#### GAAT1:

Development should be designed to incorporate safe, direct and convenient routes for people who are walking and wheeling.

#### GAP1:

Retain and enhance the Phoenix Trail, access to and use of it, and the natural character of the Trail.

#### GAA1:

Encourage improvements to the network of alleyways that support safe movement for all.

#### **GAPT1:**

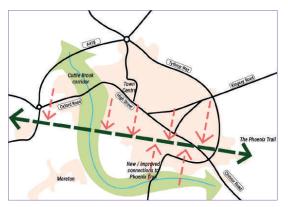
Development should be close to or incorporate bus routes and stops.

#### GAM1:

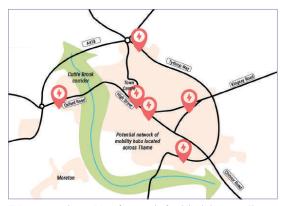
Encourage provision of a network of mobility hubs that supports use of cycling, public transport, car share and other micro mobility options, and which incorporate EV charging points.

#### **GATCP1:**

Support rationalisation of town centre parking, subject to utilisation, where it helps support street greening initiatives and helps facilitate non car-modes of transport.



TNP2 supports the provision of improvements to and new links to the Phoenix Trail, as well as improvements to the quality and attractiveness of the Trail, including new public art and unobtrusive lighting.



TNP2 supports the provision of a network of mobility hubs across Thame, where travel choices provide an alternative to the car for short journeys.

Figure 22: Summary display poster – page 13



#### **NEXT STEPS**

#### How to respond

Thank you for viewing the consultation material. Please let us know what you think about TNP2 by completing the questionnaire.

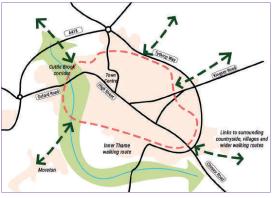
The questionnaire can be completed online via the Town Council website:

#### www.thametowncouncil.gov.uk

Alternatively, you can complete a paper version of the questionnaire and return to the Town Council:

# Thame Town Hall High Street, Thame, OX9 3DP

The consultation period runs until Monday 7 August 2023.



TNP2 supports the provision of a leisure and recreation walking route around Thame that connects green spaces with community facilities and extends out into the countryside, linking with surrounding villages.

#### **Making the Plan**

We will review all comments and prepare a revised Plan for submission to South Oxfordshire District Council (SODC) later this year (see below).

SODC will then re-consult on the Plan and appoint an independent examiner to review it. They will advise whether the Plan should proceed to a referendum or not.

At the referendum, everyone of voting age living in the Plan area will have a chance to say whether TNP2 should be adopted ('made').

If more than 50% of people who turn out to vote are in favour of the Plan being made it can then be used to inform and determine planning applications as well as opportunities for future investment across Thame.



Figure 23: Summary display poster – page 14

# **Appendix B: Questionnaire**

## TNP2: DRAFT THAME NEIGHBOURHOOD PLAN



## CONSULTATION FEEDBACK FORM (REGULATION 14 STAGE)

#### **PLEASE RETURN BY MONDAY 7 AUGUST 2023**

The Draft Thame Neighbourhood Plan has been informed by and responds to comments made during earlier consultation events. We are now seeking your views on the Draft Plan.

The Draft Plan includes a series of proposed policies that will help shape future change and development in Thame. These are highlighted in green boxes throughout the Plan. These include development site allocations as well as wider principles and criteria.

Your comments will be read and considered carefully and may result in modifications to the Draft Plan before it is submitted to South Oxfordshire District Council. There will then be a further consultation on the final Draft Thame Neighbourhood Plan ahead of the independent examination.

Before you complete this questionnaire please take the time to familiarise yourself with the Draft Plan. This is available online via the Thame Town Council website:

www.thametowncouncil.gov.uk/tnp2

The questionnaire can be completed and returned online. This form can also be returned by email, to:

consultations@thametowncouncil.gov.uk

Alternatively, the form can be returned by post, to:

TNP2 Consultation Thame Town Council Town Hall High Street Thame Oxfordshire, OX9 3DP

Thank you very much for your time and feedback.

Figure 24: Survey form – page 1

#### **PROPOSED POLICIES**

Policy Ref.	Proposed Policies – Growth and Development	Circ	le on	e no.	per r	ow	
GDH1	Housing allocations	1	2	3	4	5	
GDH1a	Land south of Wenman Road	1	2	3	4	5	
GDH1b	Diagnostics Reagents	1	2	3	4	5	
GDH1c	Land at Windmill Road	1	2	3	4	5	
GDH1d	Land at Oxford Road	1	2	3	4	5	
GDH2	Windfall housing criteria		2	3	4	5	
GDH3	Housing type, tenure and mix	1	2	3	4	5	
GDE1	Land at Rycote Lane	1	2	3	4	5	
GDE2	Windfall employment proposals	1	2	3	4	5	
GDR1	Cattle Market site	1	2	3	4	5	
GDR2	Town centre uses		2	3	4	5	
GDV1	Visitor economy	1	2	3	4	5	
Policy Ref.	Proposed Policies – Character and Place Quality	Circ	le on	e no.	per r	ow	
CPQ1	Design in response to local character	1	2	3	4	5	
CPQ2	Design principles for employment development	1	2	3	4	5	
CPQ3	Town centre design principles		2	3	4	5	
CPQ4	Self and custom-build housing		2	3	4	5	
CPQ5	Sustainable design and construction		2	3	4	5	
CPQ6	Street hierarchy		2	3	4	5	
CPQ7	Parking in residential areas		2	3	4	5	
CPQ8	Paving of front gardens		2	3	4	5	
Policy Ref.	Proposed Policies – Services and Facilities	Circ	Circle one no. per row		ow		
SFO1	Community facilities and services	1	2	3	4	5	
SFO2	Existing open spaces		2	3	4	5	
SFO3	New open spaces		2	3	4	5	
Policy Ref.	Proposed Policies – Natural Environment		Circle one no. per row				
NEB1	Biodiversity	1	2	3	4	5	
NEC1	The Cuttle Brook Corridor		2	3	4	5	
NEF1	Flood risk and sustainable drainage		2	3	4	5	
Policy Ref.	Proposed Policies – Getting Around	Circ	Circle one no. per row				
GAAT1	Active travel	1	2	3	4 5		
GAP1	The Phoenix Trail	1	2	3	3 4 5		
GAA1	Alleyways 1 2		3	4	5		
GAPT1	Public transport	1	2 3 4 5				
GAM1	Mobility hubs and EVs	1	2	3	4	5	
GATCP1	Town centre parking	1	2	3	4	5	

Figure 25: Survey form – page 2

#### **COMMENTS**

If you have any comments or suggested modifications please add them here, stating the section of the Draft Plan or Policy to which they refer:

Section of Plan / Policy Reference	Comment

Figure 26: Survey form – page 3

#### **YOUR DETAILS**

Please note that fields marked with a [\*] are required

Name [*]	
Address [*]	
Email address	
Post Code [*]	

Are you (please tick all that apply) [\*]

The you (prease tiek an that apply) [ ]				
A resident of Thame	□ Yes □ No			
A visitor to Thame	□ Yes □ No			
An employee in Thame	□ Yes □ No			
A business or organisation in Thame	☐ Yes ☐ No (if yes, please provide the name of the organisation below)			
, , , , , , , , , , , , , , , , , , ,				
An agent, landowner or developer	☐ Yes ☐ No (if yes, please provide the name of the organisation, and whom you are acting on behalf of, below)			
Other (please specify)				

How old are you (please only tick one) [\*]

Under 18	18 - 25	26 - 35	36 - 45	46 - 55	56 - 65	Over 65	Would rather not say

#### **CONSENT**

We need to store your personal information in order to receive your comments.

A summary of comments will be made publicly available. Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1988 and General Data Protection Regulations. Thame Town Council will process your details in relation to the preparation of this document only.

Please confirm whether you agree to the following:

I consent to Thame Town	
Council storing my personal	
data for the purposes of this	□ Yes □ No
Neighbourhood Plan	
consultation [*]	



Figure 27: Survey form – page 4

### **Appendix C: Organisations contacted**

This appendix includes details of all organisations contacted at the Regulation 14 stage.

#### Statutory Consultees (as advised by SODC)

The Coal Authority

**Homes England** 

Natural England

**Environment Agency** 

**Historic England** 

**Network Rail** 

**National Highways** 

Marine Management Organisation

ВТ

EE

Three

ENF Enquiries – Vodafone & O2

Oxfordshire Clinical Commissioning Group

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Boards

**NHS England** 

Avison Young (on behalf of National Grid)

Scottish and Southern Energy Power

**UK Power Networks** 

SGN

**Thames Water** 

#### **Local Authorities contacted**

South Oxfordshire District Council
Oxfordshire County Council

**Buckinghamshire Council** 

#### **Parish Councils contacted**

Ashendon Parish Council

**Aston Rowant Parish Council** 

**Brill Parish Council** 

**Chearsley Parish Council** 

**Chilton Parish Council** 

**Chinnor Parish Council** 

**Cuddington Parish Council** 

**Dinton Parish Council** 

**Dorton Parish Council** 

**Great Haseley Parish Council** 

**Great Milton Parish Council** 

Haddenham Parish Council

**Ickford Parish Council** 

Kingsey Parish Council

Lewknor Parish Council

Little Milton Parish Council

Long Crendon Parish Council

Longwick Parish Council

Milton Common Parish Council

Oakley Parish Council

**Shabbington Parish Council** 

Stokenchurch Parish Council

Sydenham Parish Council

**Tetsworth Parish Council** 

**Tiddington Parish Council** 

**Towersey Parish Council** 

Worminghall Parish Council

### Community, Social, Leisure and voluntary organisations contacted

21<sup>st</sup> Century Thame

A1 Martial Arts

Age UK Oxfordshire

Air Cadets

Assessited Reading for Children Oxfordshire

**Aylesbury Methodists** 

**Barley Hill Church** 

Barley Hill School

Chiltern Vale Residents Association

Citizens Advice

**Community Christams Thame** 

Community First Oxfordshire

**Custom Karate** 

**Cuttlebrook Conservation Volunteers** 

East Thame Residents Association

**Grace Church Thame** 

Haddenham Ukelele

Kinder Gym

Lea Park Residents Assocation

Little Ankle Biters

Lord Williams's School

Markt Town Miniturists

MP Sports Academy

National Association of the Widowed

Oxfordshire Mind

**Phoenix Community Club** 

popup Thame

**Red Kite Family Centre** 

Red Kite Radio

Reserve Forces and Cadets' Association

Royal British Legion

Ryobu-Kai Karate-Do

Saint Josephs School

**Sew Patchwork** 

**Sharing Life Trust** 

Singing for Fun

Southern Thame Residents Association

St. John Ambulance

Thame & District Classic Motor Club

Thame and District Allotment Society

Thame and District hosuing Association

Thame Badminton Club

Thame Belles WI

Thame Bridge Club

Thame Coral Society

Thame Cinema

Thame Community Car

**Thame Concert Band** 

Thame Cricket

Thame Debt Centre

Thame Fitness

Thame Flower Club

Thame Football

Thame Games Club

Thame Gammon

Thame Green Living

Thame Hockey

Thame Inner Wheel

Thame Library

Thame Museum

Thame Park Residents Association

**Thame Scouts** 

Thame Shed

Thame Speakers Club

Thame Tennis Club

Thame Womens Institute

Thame Youth Projects

Thame Youth Centre

Thames Valley Police

The Space Thame
The Tree House Thame
Towersey Morris
Victoria Mead Residents Association
Village Voices
Whilst Drive (Age UK)
Whitchert Chorale
Yoga Thame

Furthermore, around 25 locally based service . manufacturing businesses were also contacted (not including 'High Street' retail or professional services)

#### Local land agents, developers and landowners contacted

Barton Willmore
Cala Homes
David Lock Associates
Hallam Land
Iceni Projects
JPC Planning
Land & Partners
Nexus Planning
Ridge & Partners
Satnam Developments
Savills
SODC Masterplanning Team
South Oxfordshire housing Association

Stoford

Figure 28: Text of email /letter sent to statutory consultees notifying them of the Regulation 14 consultation

Figure 29: Text of email / letter sent to Oxfordshire County Council notifying them of the Regulation 14 consultation. A separate letter was sent to the County specifically to request that comments from various service areas be coordinated.

## **Appendix D: Other material**

The leaflet presented overleaf was prepared and distributed on behalf of Cala Homes during the consultation period. It seeks to present the site they have an interest in as an alternative to the land at Oxford Road that was allocated in the Regulation 14 version of the Neighbourhood Plan. It is understood that this was distributed to households living in proximity to the Oxford Road site. Responses to the survey indicate it may have influenced some responses as they specifically mention the material, though it is difficult to determine how much of an impact this had. It is included as part of the record of the overall consultation period.



This newsletter is being issued on behalf of CALA Homes in relation to the new Thame Neighbourhood Plan, known as TNP2. CALA Homes builds high quality homes in southern England (including Oxfordshire) and you can learn more about us at www.cala.co.uk.

TNP2 has been prepared by Thame Town Council and covers the entire area within the boundaries of the Town Council. It sets out the community's aspirations for the area over the period to 2035 (which aligns with the wider South Oxfordshire Local Plan). It establishes policies relating to land use and development and where new homes, employment areas and other land uses should be located.

TNP2 also represents the community's vision for Thame and gives local people and businesses a much greater say in how the places they live and work in should change and develop over time. A public consultation on the draft version of TNP2 has recently been launched by the Town Council, with full details on how you can have your say available on their website at www.thametowncouncil.gov.uk/thame-town-council/thame-neighbourhood-plan-revision/#Consultation3.

Figure 30: Leaflet prepared by Cala Homes – page 1

CALA

#### **TNP2 Objectives**

CALA Homes has been fully supportive of TNP2 and its vision for where new growth should be located. We are particularly supportive of the TNP2 objectives:

- 1 The compactness and walkability of Thame should be retained, with new homes within comfortable travel distance, by foot and by bike, from the town centre and other social and community facilities located around the town.
- 2 The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk.
- 3 Growth should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside.

- 4 The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained.
- 5 New development should be well integrated with the existing built form, contributing to the achievement of integrated communities.
- 6 New development should respect the historic growth and evolution of Thame.

The draft TNP2 needs to allocate sites for new housing to meet a minimum need for 339 homes in Thame as required by the South Oxfordshire Local Plan. To achieve this, TNP2 has included several sites as shown on the plan in this newsletter (highlighted in orange).

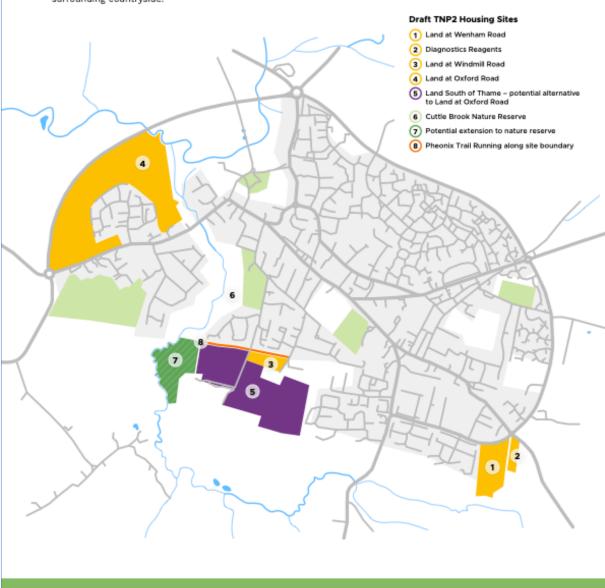
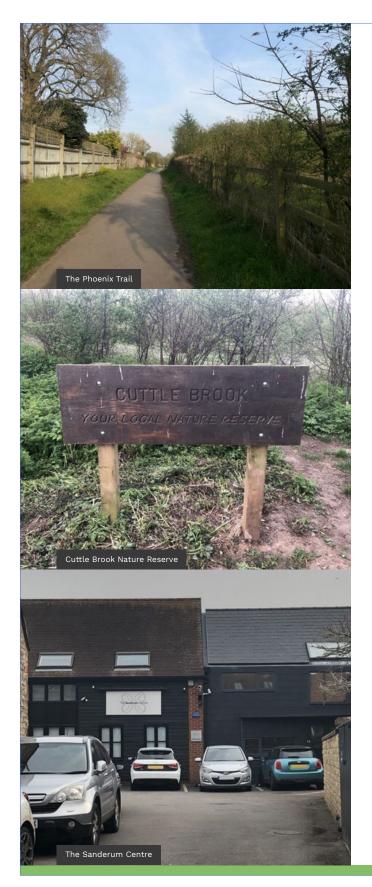


Figure 31: Leaflet prepared by Cala Homes – page 2



## Land South of Thame

Whilst we broadly agree with the housing sites identified in TNP2, we feel that the Land at Oxford Road (shown as site (4) on the plan) does not best meet the objectives of TNP2 out of the options available.

CALA Homes has proposed a site (Land to the south of Thame) to be included in TNP2, which we consider better meets the objectives of TNP2 in comparison with the Land at Oxford Road, as well as delivering all of the Oxford Road site's housing requirements. The CALA site is also shown on the plan on page 2 (site (5) shaded purple), but has not been selected for a housing allocation in the draft TNP2 at this stage.

In addition to new homes, Land South of Thame could provide the following community infrastructure benefits:

- Part of the Sustrans National Cycle
  Way runs along the Phoenix Trail to the
  north of the site, with this part of the
  Phoenix Trail controlled by the same
  landowner as Land South of Thame and
  leased to Sustrans until November 2024
  (shown as (8) on the plan). Including the
  Land South of Thame site in TNP2 as
  a preferred residential site in place of
  the Oxford Road site presents a unique
  opportunity for the land currently leased
  to be gifted to Sustrans permanently.
- A unique opportunity to extend the Cuttle Brook Nature Reserve onto 4.4 hectares of land south of the Phoenix Trail (shown as (7) on the plan). In addition, a further 3.5 hectares of interconnected open space will be provided. This new green infrastructure can only be provided through the Land South of Thame proposals, with both sites in the same ownership.
- As well as new homes, Land South of Thame could provide additional supporting infrastructure, with the site capable of providing a new primary school, nursery and start up business units like the Sanderum Centre in Thame town centre. Health facilities could also be provided within a small neighbourhood centre. Vehicle access to the site can be provided via Thame Park Road to the east.

Figure 32: Leaflet prepared by Cala Homes – page 3



#### **Benefits of Land South of Thame**

The reasons why we think Land South of Thame better meets the objectives of TNP2 than Land at Oxford Road are:

- 1 Land South of Thame is within a 10 minute walk / 7 minute cycle of Thame town centre. Land at Oxford Road is further away from the town centre. Land South of Thame therefore better meets the objective for sites that are walkable and keep the town compact. A range of new community facilities will be provided within the site itself, which will benefit existing and new residents.
- 2 Land at Oxford Road is constrained by flood risk, landscape and heritage constraints. It also involves building on land that in part was originally designated as land to be made more publicly accessible and also intended to be natural green space extending the Cuttle Brook Nature Reserve. These constraints severely limit the ability of land at Oxford Road to deliver the anticipated number of new homes. Land South of Thame does not have these constraints.
- 3 With the Cuttle Brook Nature Reserve Extension and associated green space, Land South of Thame will integrate well into the surrounding landscape, bolstered by extensive additional new landscaping. Whilst Land at Oxford Road includes open space proposals, it does not create any opportunities to add value to the Cuttle Brook Nature Reserve.

- 4 Through high quality foot and cycle links, Land South of Thame will be highly sustainable and integrate successfully into Thame town centre, which is easily accessible without the need to use a car. Land at Oxford Road does not benefit from this ease of access.
- With its sustainable location and on-site infrastructure, Land South of Thame is a logical extension to Thame with limited impact on existing services

Thame Town Council is currently consulting the local community on the draft TNP2. This consultation can include the Thame community's views on the sites being proposed for new homes.

If you agree that Land South of Thame, as proposed by CALA Homes, would be more appropriate than Land at Oxford Road, for the reasons outlined above, we encourage you to make your views known through the Town Council's TNP2 consultation. The consultation deadline is 7th August 2023.

Full details of the consultation and how you can respond can be found at:

www.thametowncouncil.gov.uk/thame-town-council/ thame-neighbourhood-plan-revision/#Consultation3

If you would like to know more about CALA Homes and our vision for Land South of Thame you can contact Paul Vicary or Emily Taylor at DevComms on info@devcomms.co.uk.



Figure 33: Leaflet prepared by Cala Homes – page 4

## Thame Town Council Neighbourhood Plan Review (TNP2)

Consultation Report
Summary of Regulation 14 Consultation
January 2024



Thame Town Council Town Hall High Street Thame, OX9 3DP

www.thametowncouncil.gov.uk

# Thame Town Council Thame Neighbourhood Plan (TNP2)

Consultation Statement, February 2024
Volume 4: Report of Regulation 14 Consultation

Thame Town Council

Town Hall

High Street

Thame, OX9 3DP

www.thametowncouncil.gov.uk