

Full Council

Date:	12 August 2025
Title:	Land north of Oxford Road
Contact Officer:	Graeme Markland, Neighbourhood Plan Continuity Officer

Proposed Development

1. This application, [P23/S4262/FUL](#), is the third amendment to the originally submitted scheme. Permission is sought for 111 residential dwellings and infrastructure over a site of 17.33 hectares. The application contains details of proposed highways and footpath works, sustainable urban drainage systems, pumping stations and green infrastructure.
2. It is proposed to site 54 homes in an area east of the existing estate and 57 in an area to the north of it.

Background

3. A full history of this site can be found within the relevant officer report for [Full Council on 13 May 2025](#). Briefly, an application was originally submitted in December 2023 for 154 homes. Following the receipt of comments this was revised downwards to 120 homes in November 2024. At that time, the revised Thame Neighbourhood Plan (TNP2) did not hold weight with regards to the Oxford Road site. The Town Council could only recommend refusal for this reduced scheme on grounds of non-compliance with the latest evidence on housing mix. Specific comments were, however, submitted with regards to First Homes, footpaths and connectivity, and design.
4. In April 2025 a second round of amendments was submitted. The housing numbers were revised downwards to 111 homes, along with changes to landscaping and footpath provision. With TNP2 adopted, the Town Council recommended refusal on the grounds of housing numbers and the proposed affordable housing mix, the housing split across the site, the impact on the protected views north from Oxford Road, flood risk and the potential for increased footfall harming the Cuttle Brook Nature Reserve.
5. The latest amendments were submitted to the District Council on 10 June 2025. The District Council has already received multiple comments regarding these amendments, including from both internal consultees and the County Council. Changes have been recommended and reference made to matters that will require further attention.
6. On 1st August 2025 the Town Council received notice from the applicant that they would, therefore, be holding a meeting with the case officer to discuss another round of amendments to address the newly arising comments. In anticipation of the amendments being submitted soon this report will address those already in the public domain.

Thame's last response

7. Thame's objections made in response to the second amended scheme are listed below. Against these are listed any relevant changes proposed by the latest amendments and any up-to-date commentary made by key consultees. Recommendations have been made on whether objections should be maintained.

8. Objection 1 and 2: The number of homes and the split do not reflect TNP2 Policy GDH1d in terms of number of overall housing and split between the two land parcels.
- The applicant has neither changed the proposed numbers in either phase nor amended the overall numbers of housing on the site. With only a relatively minor change to the type of affordable housing provided in Phase 3 there has also been no material change to the proposed density across the phases.
 - The additional numbers provide for 4.4 units of affordable housing and there would be a slight uplift in Community Infrastructure Levy for Thame and the District Councils to use towards local infrastructure. This is a material consideration that should be given some positive weight.
 - The overprovision in numbers and disparate split between the two phases means the proposal remains contrary to TNP2 Policies GDH1 and GDH1d. This is discussed further in terms of the policy context below, but as a departure from TNP2 this matter should attract significant negative weight. This objection should be maintained.
9. The EA's objection means it is not clear if the proposal meets Policy GDH1d in avoiding built development in the functional flood plain of the River Thame and Cuttle Brook.
- The Environment Agency has not received all the information they have asked for, leaving them unable to run the applicant's submitted flood modelling.
 - The District's Drainage Team have confirmed that until the EA has approved the submitted flood model the absolute detail of the flood zone boundaries cannot be known. These are needed to inform both the site's developable area and the recommended finished floor levels.
 - The Lead Local Flood Authority has reviewed the flood risk assessment and drainage strategy and requested further information on winter storms. They have also required that additional storage (presumably of waters temporarily held back above the design capacity of attenuation ponds, etc.) be set to zero.
 - It is recommended that the Town Council maintain this objection until the matter is resolved.
10. The proposal fails to minimise the impact on views along the Cuttle Brook from Oxford Road and from the A418.
- Within the last officer report to Committee of 13 May 2025 it was noted that the policy text did not preclude development within the view cone area, although supporting text, Figure 15 from TNP2 and principles established within the April 2024 Masterplanning Report require that the corridor should not be obscured.
 - It was noted within the report that the Phase 2 homes on the eastern boundary and those behind the east-west hedgerow would remain prominent, especially if the hedge was maintained at a standard height.
 - In their response the District Council's Landscape Officer requested that the applicant increase the numbers of trees and tree groups planted along the development's eastern boundary that faces Rycote Meadow. The officer believed this would mitigate the development's impact on winter views from Oxford Road once the trees had become established.
 - Within the amended scheme, the applicant has proposed additional tree planting on the eastern boundary and tweaked the type of a small number of trees behind the east-west hedgerow. In response to this amended scheme, the Landscape Officer does not raise any objection regarding the Cuttle Brook corridor views. It is, therefore, assumed that they are satisfied with the proposed mitigation for the corridor.

- Subject to these amendments being retained and given that the Landscape Officer is no longer objecting on these grounds, it is recommended that the Town Council withdraws this objection.

11. The development would risk harm to the existing CBLNR in failing to mitigate the impact of future residents.

- Following a visit by the District's Ecologist to the Cuttle Brook Local Nature Reserve they replied to the last amendments by stating the proposal failed to meet TNP2 Policy NEC1 in not retaining / enhancing the CBLNR. This was driven by both the concerns of the Ecologist and the Town Council about the impact the extra residents could have on the CBLNR. The Ecologist also recommended the applicant transfers undevelopable land near the Cuttle Brook to the Town Council to help provide a formal, northwards extension of the CBLNR.
- Through the latest amendments which include the provision of an area for dog-walkers, connected to publicly accessible open space, the District Ecologist has stated this matter has been satisfactorily addressed.
- Subject to these proposals remaining in place, it is recommended the Town Council withdraws this objection.

12. The affordable housing provision does not reflect any recent evidence on housing (size) mix and is, therefore, not compliant with Local Plan Policy H11.

- A considerable section of the last officer report addressed this issue. The ability of local communities to influence housing mix is seen as a major benefit of neighbourhood planning. The mix of the private housing on offer was and is noted as being broadly compliant.
- Thame's optimal local affordable housing size mix is identical to that required for private homes. It should be expected that the affordable mix would be better guided by the District Council to reflect the detailed split given within relevant housing needs documents. In Thame's case, relatively few 1 and 2-bedroom homes would be required, with greater emphasis on the provision of 3 and 4+ bedroom homes. The recommended mix that arose from the District Council's housing team did not, however, reflect either TNP2 evidence or that of the District's own up to date housing needs reports.
- The District's Team has subsequently issued two responses barely 10 days apart, one for "June" amendments and one for "July" (even though no amendments appear to have been submitted to the District Council since June). The two responses are highly contradictory; in the first, for example, the number of 1 bed flats or maisonettes required was 8, in the second, 18. As for 2-bedroom homes in the first, 20 homes were required yet in the second, 13. There is no explanation given. Advice was sought on this matter, but no response has been received from SODC.
- The applicant appears to have responded to the numeric split between social and affordable rent and low-cost home ownership advised by the Housing Team's June commentary, matching it exactly (but not the size recommendation). This is sufficiently close (63%) to meet the requirement of TNP2 Policy GDH2 which seeks 65% of affordable homes being provided at either social or affordable rent.
- The applicant's proposed affordable size mix is not tailored to the detailed requirements of Thame. It does, however, meet the headline policy requirement of TNP2 in that at least 65% of new homes should be provided as 1-3 bedrooms. Against the background of mixed messages arising from the District Council's Housing Team the Town Council should recognise the applicant has delivered an affordable size mix in line with TNP2 Policy.
- The Town Council should remove its objection to this matter. It could add a comment noting that the applicant's proposed size mix is a better match for the

most up to date affordable housing needs evidence (from the Thame Housing Needs Assessment and the SODC / Vale of White Horse Joint Housing Needs Assessment) than that recommended by the District's Housing Policy Team.

13. In addition, Thame submitted one comment: The 2022 Thame Housing Needs Assessment indicates First Homes should be provided at 50% of market rate to be affordable for residents. Again, this was based on the evidence produced as part of the Thame Neighbourhood Plan. This comment should be retained.

Open Space – an additional material matter

14. Just prior to the submission of the most recent amendments, the applicant approached the Town Council and offered it the ownership of the public open space away from the housing and roads. This would include the proposed area set aside for recreational use and the land identified for on-site Biodiversity Net Gain (BNG) provision.
15. Both areas of land would have to be subject to detailed management plans. The Town Council would be bound to follow these agreed plans, although it might be able to increase the frequency of maintenance or provide for additional biodiversity gain where there would be no conflict with any conditions within the management plans. The BNG element might require additional training for TC maintenance staff / greater involvement from volunteers or input from charitable / professional organisations.
16. Such a gift of land to the Town could be seen as a material consideration, in providing recreational land. National planning guidance advises that a material consideration is generally seen as one linked to public interest. Public access to and across this land would in any case be required as a minimum for recreation due to the existing Section 106 Agreement (details of further benefits are discussed below). If managed well, therefore, there would be no additional benefit to residents and visitors between either a private or public ownership model. If owned by the Council there could, however, be a greater opportunity to steer the management regimes of the proposed land and the existing Cuttle Brook Local Nature Reserve to make sure they support and complement one another. It could better achieve the long-term aspiration of extending the LNR northwards. With the land within the control of TTC there would also be more certainty around the land at least being managed to the appropriate standards for the lifetime of the development, if only due to the continuity the Town Council can offer.
17. The weight to give to this material consideration should, therefore, largely be based around an understanding that Town Council ownership would guarantee both ongoing, day-to-day maintenance and future improvements to facilities or the management of habitats. This ownership benefit would need to be weighed against long term costs, which are likely to be at least partially defrayed through some financial mechanism.
18. The Council's Asset Management Working Group has been contacted about this proposal and has expressed interest in exploring the opportunity. It should be noted that the Town Council would need to pass a resolution to agree to take on ownership and management of this land. This would not happen without prior assessment of the maintenance that would be required and the impact on Town Council resources and finances.
19. Simpler to understand are the details of the open space provision now offered, regardless of the ownership model. The first TNP required that 17 ha of publicly accessible open space be provided along with the 203 homes proposed. A further 0.5 ha would have been required if the TNP's housing reserve site for 78 homes came forward (which it could not). For clarity, all this open space was proposed and provided as *publicly accessible*, i.e., through fenced / boundary footpaths running through agricultural fields. No wider access is officially available.

20. The total area of open space (of all types) now proposed is claimed to be 18.78 ha, some 1.78 ha more. Of the 18.78 ha, 12.28 ha would be via publicly accessible footpaths, some of which run through areas proposed for improvement for biodiversity net gain; some 6.5 ha would be through fully accessible recreation land / that set aside for a dog walking area (1.15 ha). In addition, the applicant has also submitted a schedule that suggests the amount of amenity space and play areas associated with the housing either complies with or exceeds District requirements. Thame remains short of general-purpose public amenity space, and the dog walking area could help reduce the ongoing impact and harm being caused to the Cuttle Brook Local Nature Reserve.
21. The existing outer footpath runs through land in the north and northeast of the site that is prone to both surface water and river flooding during wetter months. The addition, therefore, of a circular footpath around the large arable field to the west of the current site, linking to the proposed dog walking area, would provide an alternative recreational route when surface waters / river levels are high. There is an area in the south of this field that may be prone to surface water flooding, so it should be recommended the footpath is kept away from this area.
22. The additional and higher quality provision of open space is in line with Local Plan Policy CF3 and TNP2 GDH1d. Taken with the above, the gains and improvements in open space provision are a material consideration. Given Thame's well-established needs for open space this should be given considerable, perhaps significant positive weight. The benefits of being able to join up management of the open space / BNG areas to coordinate work with improvements to Rycote Meadow and the Cuttle Brook LNR wider area should be given some, or moderate positive weight. The potential to specifically improve habitats or facilities could be dependent upon the management plan and would have to be explored further before benefit could be claimed.

Outstanding matters / updates not reported above

23. This section is largely for information, covering or updating on matters raised by other parties, including local residents.
24. **Crime Officer** (Thames Valley Police): Rear access concerns have been addressed, but they are still concerned some plots do not provide sufficient surveillance of the public realm. Large areas could be vulnerable to unauthorised vehicle access and encampments; mitigation advice has been provided.
25. **Environment Protection Team**: The noise levels meet the guidance targets except for the northmost properties in Phase 3 that overlook the A418. The gardens are to the rear and will meet the upper limit of 55 dBA for higher noise environments. The north facing windows will need to be closed except for purge ventilation. It is a planning decision whether this development meets the criteria of being a sufficiently desirable location with all the conveniences of an urban location to offset the higher noise environment at the very edge of the development. If so, it is recommended the proposed mitigation measures within the submitted noise report are installed and maintained.
26. **Forestry Officer**: Broadly acceptable, it is noted no further trees or hedgerow will need removing following the amendments. They require information on tree crates within hard landscaping and the approval of highways where trees are proposed in parking areas. Large canopy trees would better integrate the development into its setting. The residents of homes with trees in rear gardens should be given information on care within their Home packs.

27. **Heritage Officer:** No further comments but they again suggest a condition is required to secure information boards and seating for the Archaeology Heritage Viewing Area.
28. **Landscape Officer:** Most requests have been met, but they want an all-weather circular path around the northern open space. Suggests improvements to planting to ensure interest across the seasons in some areas. Wants dog waste bins proposed at the main entry points to the north and south open spaces. Regarding the play areas, general improvements for planting and placement of the play areas are suggested; those on the edges appear squeezed in with little room to provide mounds or planting to soften their outer edge. The officer notes that RoSPA have not objected to their proximity to sustainable drainage (pond) features. Some landscaped slopes should be altered to reduce their steepness, that on the edge of Phase 2 requires shallowing to look less artificial or enriching with planting. The noise bund facing the houses in Phase 3 should not have steep slopes. There is an overreliance of single-species hedgerow which is not acceptable on the rural edge and for biosecurity reasons. A management and maintenance plan will be required to cover at least the first 20 years.
29. **OCC Highways:** Sums are sought for the improvement of local bus services serving the development and for real time passenger information boards for Oxford Road stops. The proposed zebra crossing should incorporate a parallel crossing for cyclists and should be placed west of the Roman Way junction to better tie in with expected foot traffic to Lord Williams's and the Leisure Centre, unless evidence can be given to the contrary.
30. **Residents:** Many note concern over flood risk in the absence of EA / District and County approval. Traffic concerns are continuing to be expressed, especially over safety at the Roman Way / Oxford Road junction and for those crossing Oxford Road. The routing of construction traffic is a concern with most wanting it taken off the A418 / a haul road linking to Oxford Road. The housing numbers are questioned and those in TNP2 quoted. Interest has been shown over how the management of the wider estate would work once the extended areas have been built and occupied. There is concern from those living next to the potential pedestrian / cycle route adjacent to Town Farm to Oxford Road.
31. **Urban Design Officer:** Place landscaping strips against all boundary walls and ensure consistency between the boundary treatment plan and site landscape plans. Tarmac drives should be replaced with more permeable surfaces.

Recommendation:

32. Given that further amendments are expected soon, it is recommended that Thame Town Council submits a holding response to this application.