

Response 1: ID ANON-MT75-C6K9-A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-13 12:34:34

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

[REDACTED]

Name:

[REDACTED]

Job title (if relevant):

Organisation (if relevant):

Ickford Parish Council

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Overall I support the plan, however I do not think that it considers sufficiently the importance of Thame to the surrounding villages within - say - a 6 mile radius, who depend on Thame for schools, health care, social activities and retail. Almost all of these villages have been under pressure for housing and grown significantly, not only putting pressure on their local infrastructure, but by the nature of their proximity to Thame as well. This can be seen in the pressure on car parking in the centre, schools, healthcare and so forth. The NP also needs to recognise that development in Thame exacerbates the water table generally on the river flood plane and that as a consequence flooding in, for example Ickford and Waterperry and further down river has increased year on year. SUDS may not be the answer. You cannot just ignore these issues, they need to be addressed at source and in a responsible and neighbourly way.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Further research and analysis needs to be done of the impact of this plan would have on the wider catchment area. It cannot operate in isolation and ignorance.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

As outlined in the comments above.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 2: ID ANON-MT75-C6K5-6

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-13 13:29:37

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Dr

Name:

Digby Jess

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Land at Oxford Road for housing - OBJECTION

I object to the proposed land swap of the open land as designated in TNP1 being changed to housing because

- no reason has been put forward as to why the two sites reserved for school expansion on TNP1 are now to be designated as open land. Those sites are immediately adjacent to Oxford Road with their own access points and ideal for a housing development;
- the whole vista from the north to Thame and at Cuttle Brook would be ruined by an expansion of housing on the proposed 2 sites (as per CPRE's objection to the planning application);
- the Environment Agency objects to the proposed housing development because the flood risk analysis presented by Bloor in the extant planning application is completely flawed and unsatisfactory;
- the proposed use of Roman Way from Oxford Road for access to the 2 new proposed housing sites is completely unacceptable (cf available access routes from Oxford Road to the 2 school expansion sites);
- windfall housing on several sites in Thame since work started on the draft TNP2 has reduced the need for new housing developments overall, and a

smaller development on the no longer required school expansion sites would probably meet the remaining housing allocation needs.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

[REDACTED]

Response 3: ID ANON-MT75-C6KV-7

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-14 08:42:08

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Susan

Job title (if relevant):

[REDACTED]

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

[REDACTED]

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I am so very worried about the loss of habitat for our animals including birds and small reptiles as well as hedge Hogs etc.

Flooding is at record levels there is no where for the rain water to go. Themes Water is slow to correct leaks and to upgrade storage takes and pumping stations.

Too many people living in too small an area.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 4: ID ANON-MT75-C6KP-1

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-14 12:19:32

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

David Diprose

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Thame

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I recognise many of the items in the planning document from years ago. I hope the examiner will notice that what is repeatedly lacking is action.

1. Since these plans started, the emphasis has been exclusively on housing. The need for supporting infrastructure has been almost completely ignored. School catchment areas have shrunk to a critical level. GP surgeries are inadequate (five weeks' wait for a telephone appointment). Dispensing pharmacy services have reduced. Many roads are usually blocked by the increased traffic. Consideration should be given to a one-way system before there is an accident.

2. The Phoenix Trail should be an excellent facility for all Thame citizens. Instead, it is used as a cycle racetrack, often by people who live many miles away. As a mere pedestrian, I have been forced to step off the trail by and suffered abuse from many cyclists. They spend £thousands on their bikes but won't spend £5 for a bell. Instead, they appear silent from behind, frequently delighting in brushing against pedestrians to confirm their domination.

3. The allotments off Hode Garth are still not available despite more than five years of 'negotiation'. This smacks of a lack of interest by all involved.

4. A proper walk/cycleway from Thame to the railway station in Haddenham is a permanent planning item and is long overdue.

5. Thame Park is a private park, not a Thame asset. While there is a delightful public footpath through the park, there is no safe access to that path. If the council wishes to claim the park as an asset, a section of pavement needs to be installed joining the existing pavement along Thame Park Road to the start of the footpath.

6. In reality, Cuttle Brook is little more than a muddy path beside a stream. It is an under-developed asset that would benefit from a proper gravel path and improved control of the nettles.

Unless there is action concerning more than house-building I see only continued, steady decline for Thame. Without relevant action, the projected increase in the elderly population is particularly worrying.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

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Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Council action has focused only on housebuilding. Written comments clearly have no influence. A public hearing might convey concerns more effectively.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

- further limiting housing development
- strict requirements for infrastructure investment for any left in Thame's NP .
- a requirement on new development for attention to flood plain , porous surfaces to aid rainfall absorption
- a requirement for light pollution limited lighting

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

████

Other, please specify:



Tiddington-with-Albury NEIGHBOURHOOD PLAN

2016-2035

Referendum Plan



Published by
Tiddington-with-Albury Parish Council under the Neighbourhood Planning
(General) Regulations 2012 as amended.

March 2023

Guide to Reading this Plan

Of necessity, this Neighbourhood Plan is a detailed technical document. The purpose of this page is to explain the structure and help you find your way around the plan.

1. Introduction & Background

Explains the background to this Neighbourhood Plan and how you can take part in and respond to the consultation.

2. The Neighbourhood Area

Details many of the features of the designated area.

3. Planning Policy Context

Relates this Plan to the National Planning Policy Framework and the planning policies of South Oxfordshire District Council.

4. Community Views on Planning Issues

Explains the community involvement that has taken place.

5. Vision, Objectives & Land Use Policies

Key section. Firstly, it provides a statement on the Neighbourhood Plan Vision and Objectives. It then details Policies which are proposed to address the issues outlined in the Foreword and in Section 4. These Policies are listed on page 6. There are Policy Maps at the back of the plan and additional information in the Appendices to which the policies cross reference.

6. Implementation

Explains how the Plan will be implemented and future development guided and managed. It suggests projects which might be supported by the Community Infrastructure Levy which the Parish Council will have some influence over. We acknowledge also that it deals with a number of issues which although relevant are outside the scope of a Neighbourhood Plan.

Tiddington-with-Albury NEIGHBOURHOOD PLAN

2016-2035

REFERENDUM VERSION

MARCH 2023

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FOREWORD

This Neighbourhood Plan covers the parish of Tiddington-with-Albury (The Parish). Neighbourhood Planning allows a community to have a strong voice in how development i.e., the use of land, should be shaped in their town or village in the future. The Plan must be firmly based on national and local authority policies, but also considers how those policies should be applied specifically in the parish of Tiddington-with-Albury and expands on those policies with local detail where appropriate.

The Parish Council wishes to thank members of the Steering Group who produced the Plan, the outside organisations who have given invaluable assistance and, most particularly, to all the parishioners who have completed the questionnaires and have contributed information relevant to the production of the Plan.

LIST OF POLICIES

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TwA1	NATURE RECOVERY	25
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1. INTRODUCTION & BACKGROUND

1.1 Tiddington-with-Albury (The Parish) has prepared a Neighbourhood Plan for the area designated by the local planning authority, South Oxfordshire District Council (SODC), on 21/12/2016. The plan has been prepared in accordance with the Neighbourhood Planning (General) Regulations of 2012 (as amended).

1.2 The area coincides with the Tiddington-with-Albury parish boundary (see Fig. 1 below) and is centred on the villages of Tiddington and Milton Common, and the hamlets of Albury and Draycot.

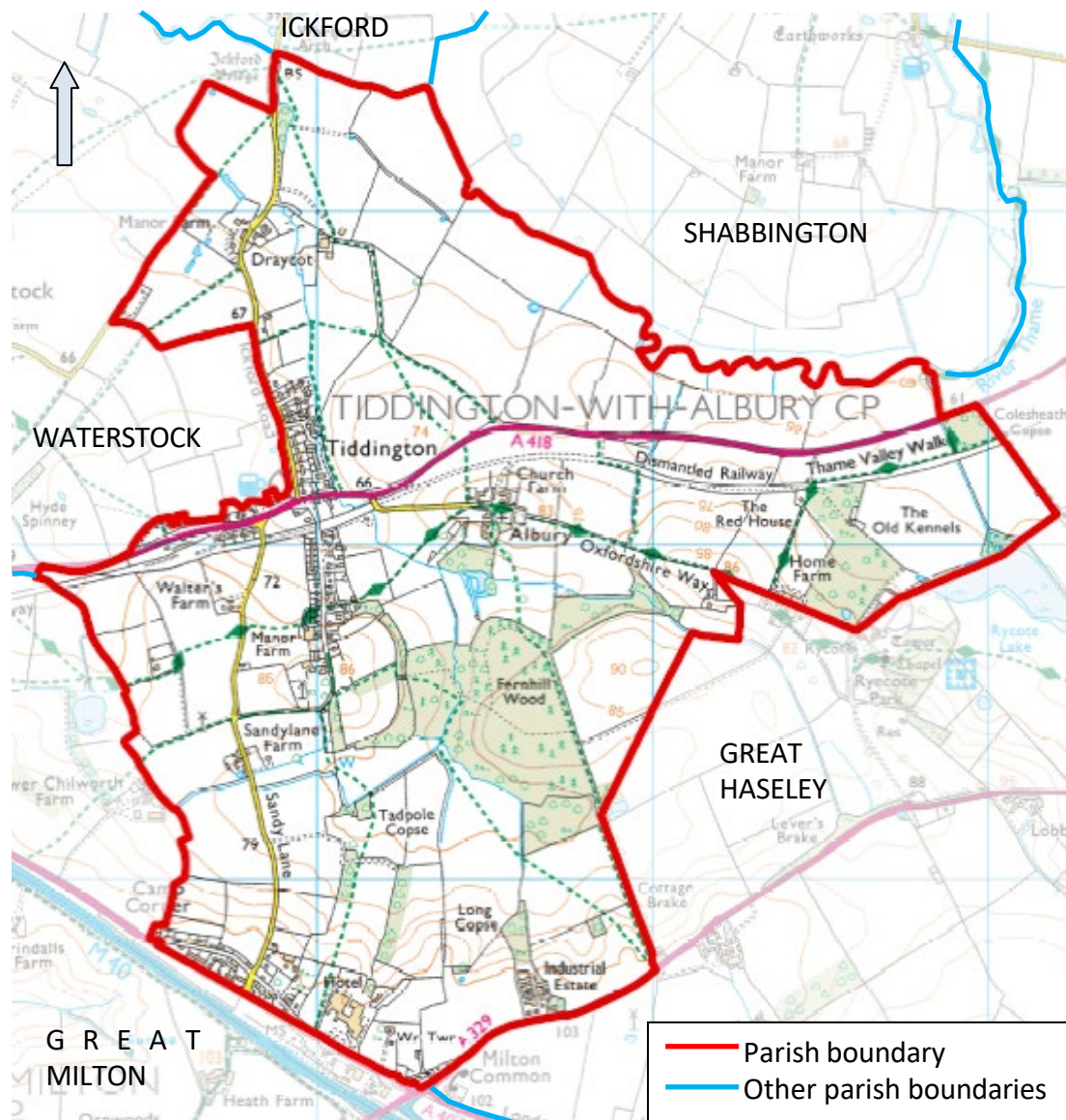


Fig 1. The Tiddington-with-Albury designated neighbourhood area

1.3 The purpose of the Neighbourhood Plan is to set out a series of planning policies that will be used to determine planning applications in the area in the period to 2035. The Plan will form part of the development plan for Tiddington-with-Albury Civil Parish, alongside

the adopted SODC Local Plan 2035. South Oxfordshire and Vale of White Horse District Councils are working together to prepare a new Joint Local Plan 2041 which is in the very early stages of development.

1.4 Neighbourhood Plans provide local communities, like Tiddington-with-Albury, with the chance to manage the quality of development of their areas. Once approved at a referendum, the Plan becomes a statutory part of the development plan for the area and will carry significant weight in how planning applications are decided. Plans must therefore contain only land use planning policies that can be used for this purpose. This often means that there are important issues of interest to the local community that cannot be addressed in a Plan if they are not directly related to planning.

1.5 Although there is considerable scope for the local community to decide on its planning policies, Neighbourhood Plans must meet all of the ‘basic conditions’. In essence, the conditions are:

- Does the plan have regard to national policy?
- Is the plan in general conformity with strategic planning policy?
- Does the plan promote the principles of sustainable development?
- Has the process of making the plan met the requirements of environmental law?
- Has the plan met the prescribed conditions?

1.6 In addition, Tiddington-with-Albury Parish will need to demonstrate to an independent examiner that it has successfully engaged with the local community in preparing the Plan. If the examiner is satisfied that it has, and considers the Plan meets the above conditions, then the Plan will go to a referendum of the local electorate. If a simple majority of the turnout votes in favour of the Plan, then it becomes adopted as formal planning policy for The Parish.

The Levelling Up and Regeneration Bill

1.7 During the preparation of this version of the plan in May 2022, the Levelling Up and Regeneration Bill was placed before Parliament. The Bill proposes to make changes to both the development plan and management system. It indicates that there is a future for neighbourhood planning in that system. The government has announced that in broad terms, changes to the planning system will begin to take place from 2024, once the Bill has received Royal Assent and the associated regulations and changes to national policy are in place.

The Pre-Submission Plan

1.8 A draft Pre-Submission Plan was published for consultation in February/March 2022 for a minimum of 6 weeks in line with the Regulations. The Parish Council reviewed the comments received from the local community and other interested parties and made changes to their submission version. They have updated some of the reports included in the appendices of the plan.

Strategic Environmental Assessment & the Habitats Regulations

1.9 SODC's screening opinion of 18th November 2021 has confirmed that the provisions of the Neighbourhood Plan are not likely to have any significant environmental effects and the preparation of a Strategic Environmental Assessment will therefore not be required in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004 (as amended), having consulted the relevant statutory bodies. The Basic Conditions Statement which accompanies the Submission Plan sets out how the Neighbourhood Plan contributes to achieving sustainable development.

1.10 The screening opinion also concluded that the Plan will not need to be subject to a Habitats Regulations Assessment, as the provisions of the Neighbourhood Plan are not likely to have significant effects on Natura 2000 sites, in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended).

2. THE NEIGHBOURHOOD AREA

Parish Profile

2.1 Tiddington-with-Albury (The Parish) is located in eastern Oxfordshire on the county boundary with Buckinghamshire. It lies approximately 3.5 miles west of Thame and 3 miles east of Wheatley. Oxford lies 8.5 miles to the west and Aylesbury 12 miles to the northeast. Further details of The Parish, Appendix 1, is published in the evidence base alongside this Plan.

2.2 The Parish lies on rising land on the southern bank of the River Thame, which largely controls its agricultural use, as a mixture of arable (mainly cereals) and pasture with scattered woods and coppices, largely on the higher land.

2.3 All parts of the Parish are surrounded by agricultural land including two working farms (Albury Farm and Sandy Lane Farm) and land from Home Farm (Rycote) and Lower Chilworth Farm, both of which lie outside but on the boundaries of the Parish.

2.4 The majority of the pasture on the lower land retains Medieval ridge and furrow demonstrating the long agricultural history of The Parish and demonstrating the special nature of the environments that are preserved. The land use, compiled in 2019, is shown in Figure 2.

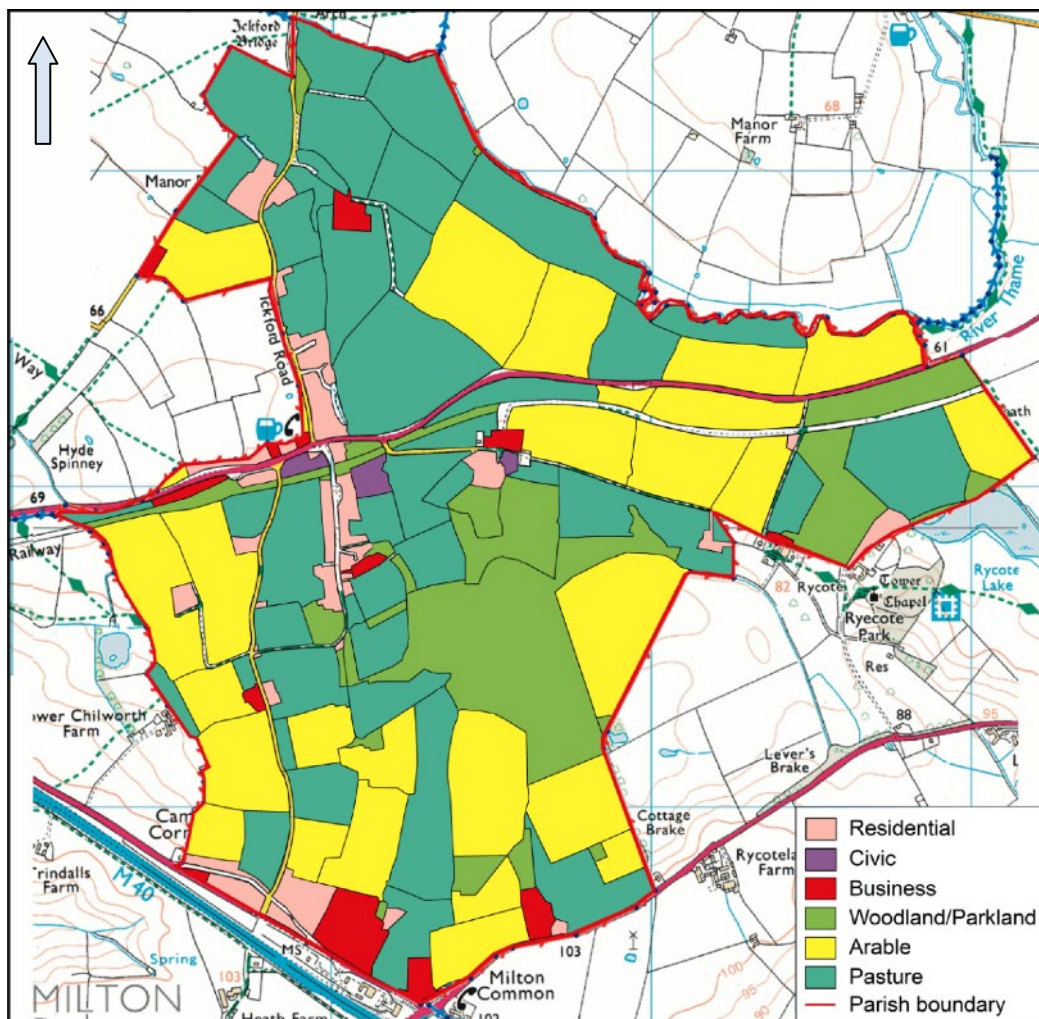


Figure 2. Parish Land Use (2019)

2.5 This rural setting is valued by the residents and makes Tiddington-with-Albury an attractive place to live.

Tiddington-with-Albury's History

2.6 The Parish has had a complicated historical development. The present Parish of Tiddington-with-Albury was only created in 1932 from the amalgamation of the two civil parishes of Albury, where the parish church is, and Tiddington. This present situation reflects an earlier 11th Century state when both were combined.

2.7 The presence of rare, worked flints confirm that there was human activity in the Parish from at least the Bronze Age. The earliest evidence of formal occupation is at Milton Common, where Romano-British occupation and structures have been proven through excavations at Camp Corner and on the course of the M40. This occupation is likely to be associated with the Roman road running across The Parish that connected the Roman town of Dorchester with Fleet Marston on Akeman Street.

2.8 Both the names Aldeberie (old burgor, a fortified place) and Titendene (the hill of Tytta) are Old English in origin and are considered to date probably from the 6th Century.

2.9 Otherwise, the written history of both Albury and Tiddington can be traced back to the Domesday Book when the first records of the two manors, in the possession of William FitzOsbern and Sawold respectively, appear. At that time Tiddington was only a hamlet within Albury, the main settlement.

2.10 From Medieval times until the 19th Century The Parish remained a small rural community that was variably divided between different major landowners, mostly remote from it.

Recent Planning Issues

2.11 Despite its growth, The Parish has no facilities having lost its school, shop, post office, and railway station and has no medical or dental services. In the Settlement Assessment Update published by SODC in October 2017, Tiddington was shown to lack certain key facilities e.g. a supermarket, shops, a doctors' surgery, all of which are characteristic of the larger villages and towns. In addition, the village scored zero for proximity to a town, larger village or centre of employment. It was given a maximum score of 20 for mass transport availability because of the frequency of the Oxford-Aylesbury bus service. The lack of these critical facilities together with poor infrastructure places limits on the amount of development that can take place. Residents are thus reliant for shopping and services that are provided by Wheatley, Thame, Oxford and Aylesbury all of which can be accessed using the bus service. There is also the retail centre based around J4 at High Wycombe on the M40, approximately 15 miles to the southeast, which is only accessible by car, but takes less time to reach than travelling to Oxford.

2.12 The 2011 Census records show The Parish as comprising 260 residential properties with a population of 685. In the period between 2001 and 2010 The Parish population was in

slight decline but, since then there has been a marked change to an increasing population, which is continuing with the growth of houses. Today, taken from the December 2020 Electoral Roll, there are 262 properties and 532 residents on the electoral role. In 2016 and 2021 the Neighbourhood Questionnaires showed that 83% of residents owned their home with 49% of respondents that had lived in The Parish for more than 31 years indicating how attractive a place it is to live.

2.13 The northern boundary of The Parish is formed by the River Thames which is also the county boundary. This area is prone to annual flooding from the autumn to the spring impacting Ickford Road, where the road was causewayed from Medieval times.

2.14 Both Thame and Wheatley are undergoing considerable expansion and are destined to have further development. These largely residential expansions will undoubtedly give added traffic to the A418 through Tiddington and will also affect the A329 through Milton Common which has M40 access.

2.15 The four residential areas of the village all have different settlement arrangements. Tiddington now has a cruciform arrangement around a crossroads on the A418, whilst Milton Common is linear, strung out along the A40. This development is primarily due to 20th Century development, particularly after WWII, that has caused an infill of pastures and paddocks located along the roads. Prior to that post-WWII expansion, the four residential areas of The Parish were essentially only small clusters of houses. Albury, on a no-through road, has remained essentially unchanged as a group of old houses nucleated around the church. Draycot, on a restricted minor road has not changed from its original scattered form of a farmhouse and associated cottages. These developments have placed strain on the infrastructure and parts of The Parish lack mains gas and the sewage system is under stress. Much of The Parish has an overhead electricity supply. These constraints mean that any wholesale development would necessitate a major infrastructure overhaul.

2.16 The newly designated Waterstock Local Wildlife Area gives impetus to an attempt to link together areas of important habitat along the River Thames and Tiddington Brook within The Parish that would enlarge and enhance the area open to the red list species identified as using the River Thames corridor.

2.17 There are no conservation areas within The Parish. However, the western side of The Parish is within the Oxford Green Belt and the whole of the parish was defined as a Designated Rural Area by The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order in 1997. There are many areas of The Parish that are defined by DEFRA as being of environmental significance. These include areas of ancient woodland, areas of ancient pasture, a river and streams. Consequently, an aim of this NP is to bring them into better focus as part of its natural capital.

2.18 The Parish contains one Scheduled Ancient Monument (Ickford Bridge) which is part of a larger structure shared with Waterstock CP, Ickford CP and Buckinghamshire CC. There are 22 Grade II Listed Buildings, the oldest of which is probably the half-timbered, wattle and daub Hill Cottage, likely to have been built prior to 1545. These old buildings mostly occur in clusters in Tiddington, around School Lane and on the A418, Albury, based on the church and others scattered at Draycot, Sandy Lane and Milton Common.

2.19 Life in The Parish was clearly agriculture-based before the main enclosures. The extensive preservation of the old agricultural system of ridge and furrow being evidence for this. In the absence of any detailed study, it is possible that the final decline of Albury which, despite it having the only church, is due to the 16th Century enclosures. The mill in Tiddington was on the main road to Thame. It is also probable that the passing of assets and land to those outside the area contributed to a swing towards Tiddington as the growth centre.

2.20 The River Thame and its main tributary, Tiddington Brook, are both prone to flood during the autumn and winter months and this controls the use of the land. This annual flooding makes the land untenable for development. The land on northern bank, in the parishes of Ickford and Shabington, Buckinghamshire, forms part of the Ickford Pastoral Vale which is protected within the Aylesbury Vale Landscape Character Assessment (2008). These areas have several red list species including otters and great crested newts.

2.21 A problem faced by many villages is that the factors controlling the volumes of traffic passing through, largely lie outside the area; Tiddington-with-Albury is no exception. Whilst NPs are largely concerned with housing and land use, transport and traffic are key issues in a sustainable Tiddington-with-Albury. Three A class roads, the A40, A329 and A418 traverse The Parish, all of which connect with the M40 that runs just outside the southern boundary of The Parish, via Junctions 7 and 8. Traffic data for the A418 and the A329 are given in Appendix 6.

2.22 The structure of the roads has changed dramatically from country lanes that linked the residential areas and farms to the two main roads leading to Thame, the local market. These changes have had a significant impact on The Parish and the potential further increase in traffic is of major concern. The A418 running through the middle of Tiddington dominates The Parish and is already subject to high volumes of traffic. It is the main road between Oxford and Aylesbury and provides access to Haddenham & Thame Parkway, approximately 6 miles northeast, with rail access to London and the Midlands. Consequently, it is an important commuter route and one used by commercial traffic. Even during lockdown, peak rush hour traffic was around 700 vehicles an hour. This amounts to more than 7000 vehicles travelling through the village on a working day, see Appendix 6. This road acts as a link from Aylesbury and the A41 to the M40, Oxford and the A34. Of particular concern is the increasing volume of HGV traffic, particularly at night-time, which is a further concern as it disturbs sleep.

2.23 The Parish lies between Wheatley and Thame, both of which have been identified for considerable development. The development which has already taken place in Thame has contributed to an increase in traffic on the A418, and it is predicted that the Wheatley developments can only add to this. Despite the provision of a 30-mph speed limit through Tiddington, reinforced by a speed camera and illuminated warning signs, traffic is still considered to travel too fast. The enforcement offered by the speed camera in the village produces variable results with 69 prosecutions in 2019. In the period to 2019 there have been 4 accidents in the village and any increase in the volumes of traffic will only exacerbate this. It is to be hoped that the newly installed Puffin Crossing, ahead of the onset of HS2 traffic, might, to some degree at least, alleviate the problem of crossing the road. In addition,

correct signage in and out of the village should lead to a more reasonable traffic flow. The staggered junction of Ickford Road and Albury View with the A418 in the middle of Tiddington is viewed as problematic, particularly during rush hours.

2.24 There are significant HGV movements generated by the M40 Junction 8 Oxford Services with vehicles using local lay-bys whilst waiting for their delivery times. Further, with the improvements on the A41 vehicles can now more easily use that and the A418 to avoid problems at the M25/M40 intersection. HGVs that miss the turnings for the M40 regularly use the village green area to turn round in. Because of the tightness of the bend and the angle of the roads this action has damaged the kerbs and destroyed the grass and planted bulbs. A further great concern to the residents is the proposal for a major transport hub associated with 1,750 new houses to be constructed on Waterstock Golf course, within the Oxford Green Belt. Quite apart from the massive increase in traffic that such a development would generate, the number of new homes is more than double that presently in the parishes of Waterstock and Tiddington-with Albury combined. This proposal would totally change the rural nature of the areas, completely overpowering the small villages and hamlets presently in the area.

2.25 The A329 running along the eastern side of The Parish at Milton Common is a link to the M40 at J7 and serves as a major link for HGVs as already identified in the Little Milton NP. The data gathered during lockdown study showed rush hour traffic averaging 600 vehicles an hour during the early afternoon. This reinforces the Little Milton NP findings, see Appendix 6. There are many HGV movements at night, and this will adversely affect the residents and any future residential developments in Milton Common. The difficult problem of identifying alternative vehicle routes has not been solved. As already observed by the Little Milton Neighbourhood Plan, the proposed residential and business development at Chalgrove will contribute further traffic to the A329 and onto the M40 at J7, with some passing through The Parish towards Thame.

2.26 Because of the nature of the minor roads in The Parish, often single lane with no footpath, they are restrictive to vehicles and parking is impossible. Pedestrians must also take care when using them as some stretches are sunken and have high banks with no refuge other than that carved into the verge at intervals by vehicles attempting to pass each other. The position of the village means that these lanes are being used as a shortcut by vehicles that they were never designed to accommodate.

2.27 The bus service between Oxford and Aylesbury is key to wider links and is an important part of making Tiddington, Albury and Draycot sustainable. The present frequency of the service was the sole factor that defined Tiddington as a 'Smaller Village'. The Milton Common part of The Parish, with only a rudimentary bus service, remains dependent on private vehicles.

2.28 There are several isolated cottages without mains drainage. Milton Common has a stored sewage system that is pumped down to the Tiddington pumping station overnight. This has caused several problems, particularly in Sandy Lane. Consequently, there are limitations on new development.

2.29 Sewage tankers commonly unload at a manhole on the village green, damaging the village green in the process.

2.30 Tiddington has suffered problems with the capacity at the pumping works that transfer waste to the Waterstock Sewage Treatment Works.

2.31 SODC considers that water resources are at or near capacity. This is compounded by the problems with the water mains, particularly on the A418, which have failed at least 8 times in the period 2019 to 2021. These incidents lead to considerable flooding around the junction with Ickford Road, and the associated houses.

2.32 There have been and currently are, numerous smaller leaks at other points throughout the supply network in The Parish. The adopted SODC Local Plan 2035 includes Policies INF4 Water Resources and EP4 Flood Risk, both of which make provisions to avoid these matters being made worse by new development. The NP has therefore not repeated these policies in accordance with the NPPF, but the current situation in the parish has been outlined here to guide the application of those policies in The Parish.

3. PLANNING POLICY CONTEXT

3.1 The Tiddington-with-Albury Parish lies within the South Oxfordshire District in the county of Oxfordshire.

National Planning Policy

3.2 The National Planning Policy Framework (NPPF) published by the Government is an important guide in the preparation of local plans and neighbourhood plans. The following paragraphs of the latest version are considered especially relevant to the neighbourhood plan:

- Neighbourhood Planning (§28 - §30)
- Rural Housing (§78 - §80)
- Promoting health and safe communities (§93)
- Local Green Space (§101 - §103)
- Promoting sustainable transport (§104)
- Achieving well-designed places (§127)
- Proposals affecting the Green Belt (§149)
- Planning and flood risk (§159)
- Conserving and enhancing the natural environment (§174)
- Conserving and enhancing the historic environment (§189)

3.3 The Government has also set out a requirement for the provision of First Homes in a Written Ministerial statement on 24 May 2021. These requirements were subsequently incorporated into National Planning Practice Guidance. The local community recognises the potential value that small scale infill housing development and a First Home exception site (see Policy TwA4) may have in enabling younger people and ‘downsizers’ to access homes in The Parish.

Strategic Planning Policy

3.4 The Neighbourhood Plan must be in general conformity with the strategic policies of the South Oxfordshire development plan. The development plan primarily comprises the South Oxfordshire Local Plan 2035 (SODCLP) adopted in December 2020. In it, Tiddington is defined as a ‘smaller village’ in the settlement hierarchy, with Milton Common as an ‘Other Village’ and Albury and Draycot not listed in their own right.

3.5 Its Policy STRAT1 (Overall strategy) supports “smaller and other villages by allowing for limited amounts of housing and employment to help secure the provision and retention of services” and Policy STRAT6 (Green Belt) restricts development to those limited types of development which are deemed appropriate by the NPPF, limited infilling in villages (§149e). In housing terms, its Policy H1 (Delivering New Homes) confines new housing development on sites not allocated to affordable housing on a rural exception sites and to “appropriate infilling within the existing built up areas of ... other villages”, unless “brought forward through a community right to build ... or a Neighbourhood Development Plan ...”. It also allows for housing development and conversions to dwellings on previously developed land, but only when “balanced against other policies of the Development Plan, particularly with

reference to safe and sustainable access to services and facilities and safeguarding the natural and historic environment”.

3.6 Policy H8 of the Local Plan (‘Housing in Smaller Villages’) guides housing development in Smaller Villages – allowing for growth of up to 10% in the housing stock. Its supporting text (§4.37) also makes it clear that Smaller Villages are not required to contribute towards delivering additional housing to meet the Objectively Assessed Need of the District. In respect of the TNP, the District Council has confirmed that the ‘indicative housing figure’ (as per 2021 NPPF §66) for the Parish is zero.

3.7 Policy H8 also supports infill development within the built-up areas of those villages in accordance with Policy H16. The settlement infill development policy, Policy H16, allows for a scale of infill appropriate to its location. It also supports redevelopment and sets no site area limit for such proposals.

3.8 There are other policies in the SODCLP that may be relevant, including:

- H1 – Delivering New Homes
- H10 – Exception Sites and Entry Level Housing Schemes
- H11 – Housing Mix
- ENV1 – Landscape and Countryside
- ENV2 and ENV3 – Biodiversity
- ENV4 – Watercourses
- ENV5 – Green Infrastructure in New Developments
- ENV6 – Historic Environment
- ENV7 – Listed Buildings
- ENV12 – Pollution
- DES1 - Delivering High Quality Development
- DES2 - Enhancing Local Character
- CF1 - Safeguarding Community Facilities
- CF4 - Existing Open Space, Sport and Recreational Facilities

A new Joint Local Plan 2041 is in its very early stages of development which will replace the SODCLP once adopted, currently scheduled for October 2024. An Issues Consultation took place in May 2022 and June 2022. The key issues that the Joint Local Plan is currently thinking about is reducing carbon emissions, nature recovery and landscape, local heritage, transport and facilities, healthy lifestyles and safe and thriving communities, and jobs and opportunities for innovation.

3.9 There are other development plan documents, for example the Oxfordshire Minerals and Waste Local Plan, that apply to the Parish. The Oxfordshire Mineral and Waste Local Plan Part 1 – Core Strategy identifies the A418 and A329 running through the parish as ‘Links to larger towns’ and the M40 as a ‘Through route’. It requires that new waste management facilities are located and managed to minimise the use of unsuitable roads, particularly through settlements. As minerals and waste matters are defined as ‘excluded development’ for Neighbourhood Plans, the Parish Council will continue to engage in future Minerals and Waste Local Plan preparation processes.

3.10 There are also other made Neighbourhood Plans in the vicinity, notably at Ickford in

Buckinghamshire. This made plan recognises the paradox that Ickford is closer to Oxford than much of Buckinghamshire and that many residents commute there. There are significant environmental protections already in place for the Ickford Pastoral Vale, immediately adjacent to The Parish which links to the Oxford Green Belt and integrates with the Waterstock Local Wildlife Site. The plan's emphasis is on the importance of preserving the pastures on the northern side of The Parish and the habitats they support. There is also the shared problem of protecting a Scheduled Ancient Monument.

3.11 Other than Ickford in Buckinghamshire, none of the parishes immediately adjoining the Plan area in South Oxfordshire are currently preparing Neighbourhood Plans. The Parish Council will engage with these parishes should a neighbourhood plan be prepared in the future as it considers that there are matters of substance relevant to the Plan area as set out below.

3.12 Waterstock – The plan for this Parish is important to the TNP on a number of levels and discussions have been held with their representatives on a number of topics, for example the Scheduled Ancient Monument of Ickford Bridge. There are significant environmental and historical links along the River Thame and the adjoining pastures with continuous habitats and consequently the animals, birds and plants that these habitats support. Degradation of these habitats is considered undesirable. The potential development on part of the Oxford Green Belt land at Waterstock Golf Course, immediately adjacent to the western side of Tiddington-with-Albury (see 2.24 above), will directly adversely affect the rural aspect of both parishes and the residents of both are unanimously against this proposal

3.13 Great Haseley – The A329 separates the residential area of Milton Common into two, only the western part of which is in The Parish, the north eastern part being in Great Haseley CP and the south and south -eastern part in Great Milton CP. In order to have continuity in the Milton Common community a degree of convergence is required.

3.14 Great Milton – The M40 effectively cuts off most communication with The Parish. The A40 contains the main section of eastern residential section of Milton Common and the important Milton Common Depot concerned with motorway maintenance. The views of Great Milton and Great Haseley are important to the NP because of the demands of the proposed new residential development of Harrington/Chalgrove and the consequent pressures placed on the road infrastructure, particularly the A329 at Junction 7 of the M40.

4. COMMUNITY VIEWS ON PLANNING ISSUES

Community Consultation

4.1 The main vehicles for communication were:

- Regular communication via Village newsletter, Village Facebook page etc.
- Regular item in Parish Council agenda and meetings to which Parishioners are welcome
- Regular mention in Parish Council Meeting Minutes (publicised in Magazine, Village website, Facebook, Parish Notice Board etc.)
- 2018 Questionnaire 1
- 2021 Questionnaire 2
- September 2021 Village Forum (advertised by posters, in magazine, on Facebook etc.)
- Discussed at village coffee morning (c. 40 attendees)
- Parish Council table and exhibits at Village fete
- Informally discussed by NP Team and Parish Councillors with Parishioners

The main themes to come out of the consultation were:

4.2 There was a good response to the Questionnaires from adults of all ages. The vast majority of those that replied to the second questionnaire did not have children in the household.

4.3 Only a fifth of residents want their next home to be outside The Parish and more than half of those choosing to remain prefer any future home to be smaller.

4.4 In line with the previous questionnaire (2018), residents support the idea of retirement bungalows and low-cost starter homes but have little enthusiasm for larger properties. The two surveys together suggest that parishioners are against any major local developments and are strongly opposed to the creation of any type of “New Town” in the area. There has also been a call for more eco-friendly housing and some interest in street lighting. The majority of people in The Parish own their homes, have lived here for many years and do not travel far to work.

4.5 Residents appreciate the community spirit in this rural environment and are keen to retain woodlands, biodiversity and open views over the countryside. The proximity of The Parish to towns with shops and health services is also valued. Footpaths, the local pub and a good bus service are particularly appreciated, and there is interest in the school transport on offer and the future possibility of high-speed Internet and traffic calming measures. The vast majority of residents have serious concerns about the volume and speed of traffic on all roads through The Parish. A bypass has even been suggested by a resident.

Parishioners also gave many useful and interesting comments, including:

- A more inclusive park with better disability access, better maintenance and more seating.
- A village shop.

- More flowers along the main road and the removal of litter.
- A concern that traffic calming measures could lead to congestion and more exhaust fumes.
- A speed limit of 20mph through the village and along Sandy Lane.
- Easier access to footpaths and better signage.

5. VISION, OBJECTIVES & LAND USE POLICIES

Before identifying specific objectives and policies, it is helpful to describe what we are trying to achieve in drafting a Neighbourhood Plan, in plain language as follows:

- a) Tiddington-with-Albury Parish is a small rural collection of four settlement areas with historic cores in Albury and Tiddington. Centuries ago, the habitation was two centres built around Albury church and some older properties near today's Fox & Goat public house. Those historic cores have largely been preserved with additional development mainly in the last 70 years and more recent linear infill development. We wish to conserve the nature and historic character of The Parish whilst supporting development which is in keeping with and enhances the character of the surrounding environment and preserves the adjacent rural landscape.
- b) The Parish sits in an open landscape of largely good agricultural land much of which is ancient pastures, ancient woodlands, long distance footpaths and historic remains. We wish to conserve that natural environment around our village.
- c) The Parish is a desirable place to live and we want that to continue. We want to maintain our vibrant local community known for friendliness and inclusion. The Parish should continue to be a desirable place to live, work and visit. We want to maintain a sensible balance in The Parish between the wildlife habitats, water courses and agriculture into which must fit housing, employment, open spaces and roads.
- d) The land west of Ickford Road and Sandy Lane lies in the Oxford Green Belt, whilst the northern boundary of The Parish abuts the Ickford Pastoral Vale (see Fig. 3 below). These have protection under policies at national and Development Plan level. There is a desire to strengthen the connections of The Parish with these features in order to preserve the archaeological aspects and enhance wildlife habitats and water courses.
- e) The age profile of The Parish population is weighted towards those aged 45 and over. We wish to contribute to supporting younger families to live in the village ensuring housing developments to meet their needs.
- f) We are concerned that the rapidly increasing amount of heavy traffic through our village at all times and the volume of commuter traffic at rush hours is having a detrimental impact on the village with particular anxiety about the safety of our younger children given the speed and volume of traffic on the main road. We are further concerned that new development in South Oxfordshire as a whole, including a distribution centre and residential area at the Waterstock M40 junction 8A, could increase traffic beyond the reasonable capacity of the village's roads. Therefore, our Neighbourhood Plan supports proposals for plans which are designed to alleviate the village's current traffic problems and that mitigate the impact of future increases.
- g) Regarding future housing, within The Parish, Tiddington, the largest of the four residential areas, is defined as a 'Smaller village' and 'smaller villages' - are likely to deliver 5%-10% growth, based on the number of dwellings at the 2011 census, minus completions since 2011 and outstanding commitments. This can be achieved through Neighbourhood Development Plans. This 5% goal by 2035 has already been achieved and The Parish Council desires only to promote future developments that address the imbalance of smaller and affordable housing in The Parish, so reflecting the expressions of the residents

and Policies H8, H9 and H10 of the SODCLP. 61.3% of the respondents thought that a larger village was not part of their vision for the future of Tiddington-with-Albury. The Parish is at the lower end of SODC's village hierarchy with a score of 28. It scores poorly for facilities (8) and proximity to a larger town or village (0) and is only elevated due to the good public transport links, dominated by the Aylesbury to Oxford service (20). Proximity to larger settlements cannot be addressed and is the main factor that controls how the Parish has developed. The Parish Council believes the current infrastructure and facilities of Tiddington cannot sustain any significant further development. Any new development would need a significant upgrade to all infrastructure and services e.g. roads, services, which would destroy the character of The Parish. Sadly, broadband infrastructure and effective mobile coverage throughout the village is lacking.

h) Tiddington-with-Albury has a playing field and children's play area as well as a vibrant, well-maintained village hall and a thriving cricket club. This should be protected and enhanced as community assets supporting the strong friendly village ethos.

i) There are public transport services to the local city and towns which are valued by the parishioners.

j) The Oxfordshire Way and the Thames Valley Walk long distance footpaths both go through The Parish and enhance the leisure opportunities for villagers and visitors.

Vision

5.1 The vision of the Tiddington-with-Albury neighbourhood area in 2035 is:

That in 2035 Tiddington-with-Albury Parish, comprising the distinct areas of Albury, Draycot, Milton Common and Tiddington, will continue to be an attractive place to live with its four residential areas still separated but all contributing to an active community.

The natural environment will have been enhanced by better integration with adjoining higher-level schemes, largely based on the flood plain of the River Thame.

Any development that has taken place will be sustainable and, in accordance with the desires of the parishioners, will fit in with the local architectural heritage, rural aspect and landscape of the village.

The network of footpaths and the bridle path will have been enhanced by better provision for cyclists along the main roads.

There will have been improvements in traffic management on the main routes through The Parish which will add to the attractiveness of The Parish.

Objectives

5.2 In order to maintain the atmosphere and sense of community of the village, conserve its friendly welcoming rural character and to achieve the Vision for 2035, the key objectives of the Neighbourhood Plan are:

Environment, Landscape and Conservation

1. To protect and enhance the quality, character and local distinctiveness of the historically and ecologically important natural landscape and environment, through projects such as the Tiddington Nature Recovery Corridor; and to minimise the impact of any development on the surrounding countryside, landscape and ecosystems.
2. To ensure the overall character of the four settlements separated by open countryside with their distinct identities is preserved, yet continue to constitute one Parish.

Housing

3. To provide good quality, sustainable housing at all levels of affordability to meet local needs using existing styles and materials which maintains or enhances the character of The Parish.
4. To ensure that any new development is aimed at the first and affordable homes level to encourage younger people to stay in the village and maintain a vibrant rural community.
5. To encourage healthy lifestyles and reduce reliance on the private car by supporting proposals that enable sustainable travel, without spoiling the rural nature of The Parish, of new and existing walking and cycle routes.

Traffic and transport

6. Ensure that The Parish's rural character does not suffer from the through traffic from larger settlements.

Land Use Policies

5.3 The following policies relate to the development and use of land in the designated Neighbourhood Area of Tiddington-with-Albury. They focus on specific planning matters that are of greatest interest to the local community, especially in seeking to preserve the varied and historic landscape with its ancient habitats.

5.4 There are parts of the Parish that are not affected by these policies, and there are many other policy matters that will be covered by the Local Plan. This has avoided unnecessary repetition of policies between the two plans, though they have a mutual, helpful inter-dependence.

5.5 Each policy is numbered and titled and is shown in bold and in shaded boxes. Where necessary, the area to which it will apply is shown on the Policies Map attached to the document. After each policy is some supporting text that explains the purpose of the policy, how it will be applied and, where helpful, how it relates to other development plan policies. An Appendix may be provided in which further details and supporting evidence are provided to which the policies cross refer.

LANDSCAPE, ENVIRONMENT AND CONSERVATION

Further details of the background to the natural environment of The Parish are included in the evidence base Appendix 2, alongside the Plan.

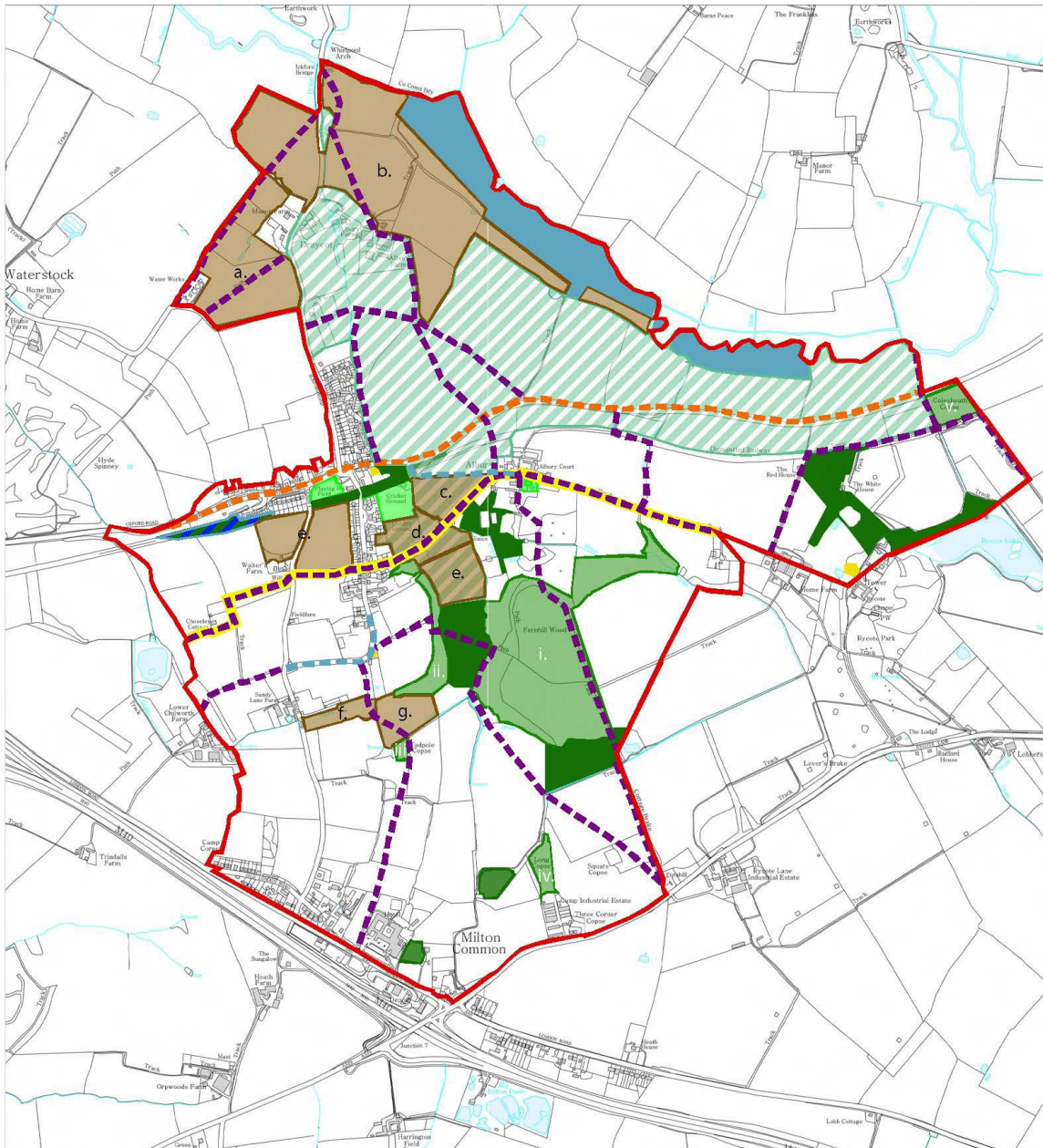
POLICY TwA1: NATURE RECOVERY

The Parish contains a variety of green and blue infrastructure that provides an environmental support system for communities and wildlife. The Neighbourhood Plan designates this Network, as shown on the Policies Map, for the purpose of promoting nature recovery, sustainable movement and for mitigating climate change. The Network comprises Local Green Spaces, footpaths, woodland, trees, hedgerows, ponds, and land of biodiversity value.

As appropriate to their scale, nature and location, development proposals that lie within or adjoining the Network should maintain and where practicable improve the functionality of the Network, including delivering a net gain to general biodiversity assets in the design of their layouts and landscaping schemes.

Development proposals that would lead to the extension of the Network, including delivery of the Tiddington Nature Recovery Corridor, will be supported, where they are consistent with other relevant policies of the development plan.

Proposals that would unacceptably harm the functionality or connectivity of the Network, including the Tiddington Nature Recovery Corridor, will not be supported.



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Tiddington-with-Albury Neighbourhood Plan

Nature Recovery Network Plan



Fig 3. Nature Recovery Network Plan

5.6 There is no formal landscape protection for The Parish. The northern boundary of The Parish adjoins Ickford Parish. The landscape has been identified as Ickford Pastoral Vale in the Aylesbury Vale Landscape Character Assessment (2008) (AVLCA). The recently adopted Vale of Aylesbury Local Plan (VALP) does not identify it as an area of attractive landscape or a local landscape area, however its Policy NE4 requires development to recognise its character as set out in the AVLCA (2008), a review of which is due to take place early in the VALP plan period. There are, however, a range of Green Infrastructure assets in The Parish. Policy ENV1 of the SODCLP attaches significant weight to protecting non-designated landscapes, the countryside and Green Infrastructure assets from harm. This policy seeks to conserve the wildlife habitats on the south bank of the River Thames to enlarge and strengthen these environments, the creation of a biodiversity corridor between the River Thames and the ancient woodland on the higher slopes of The Parish, to encourage, maintain and improve the links with the ancient woodland at Fernhill, see SRAT 6 of SODC, and protect the areas of ancient woodland and avoid the unnecessary loss of mature trees, hedgerows or other forms of wildlife corridor, either as part of a landscape scheme and layout or as part of the construction works of a development scheme.

5.7 The policy therefore defines the presence of green and blue infrastructure assets in the Parish. By doing so it supports SODCLP Policies ENV1 – ENV5 on the Environment. Its purpose is linked with the vision and principles of green infrastructure in the District and of defining a network of green infrastructure assets in the neighbourhood plan area as a means of providing environmental support for the community and wildlife. Green infrastructure is defined as a network of multi-functional green space, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities. Green infrastructure strategies are needed to maintain green corridors and extend or enhance them where possible. This includes buffer zones to infrastructure such as the M40 motorway where such buffer zones provide not only a refuge for wildlife but, particularly in Milton Common would help with noise attenuation, a problem that affects much of The Parish. These assets will be maintained and added to throughout the Neighbourhood Plan area and will be the means of nature recovery through connecting and improving habitats, sequestering carbon through woodland planting as well as promoting walking and cycling. The Network incorporates a proposed Tiddington Wildlife Corridor between the ancient woodland at Fernhill and the River Thames. This area of land has also been identified as a Recovery Zone in the Draft Oxfordshire Nature Recovery Network prepared by a partnership of local nature conservation organisations, led by Thames Valley Environmental Records Centre, Wild Oxfordshire and The Berks, Bucks and Oxon Wildlife Trust overseen by Oxfordshire's Biodiversity Advisory Group and adopted by the Oxfordshire Environment Board. The parishioners support the retention of the open landscape character in order to maintain links with the open countryside that surrounds The Parish and so preserve and enhance the flora and fauna present.

5.8 Whilst the Parish does not have any SSSIs or other designated wildlife sites, there are priority habitat areas in the Parish, Table 1. Some of which are covered by the Natural Environment and Rural Communities Act (2006) Section 41 (s41).

Table 1		DEFRA habitat classification
Type	Habitat	
Arable and Horticulture	Traditional orchards	
Grassland	Ancient grassland	
Grassland	Lowland meadows	
Freshwater river	River Thames	
Freshwater water courses	Tiddington Brook and other tributaries	
Freshwater	Ponds	
Woodland	Ancient woodlands	

Some of the woodland - Fernhill Wood, Tiddington Copse, Tadpole Copse, Long Copse and Colesheath Copse, comprise ancient woodland, parts of which are recorded as woodland in Medieval documents. This important ancient habitat is shown by the nature of the plants in the ground cover, including the native bluebell and wood anemone and forms an irreplaceable habitat and ecosystem. Much of this habitat is focussed in the southern part of the parish. Much of the rest of the woodland is classed in the Priority Habitat Inventory (Deciduous Woodland) and there are three areas of Priority Habitat Inventory (Traditional Orchard) at Spring Cottage, Rycote Park Farm and Hilltop Cottage. Throughout the Parish there is still a good distribution of mature native and ornamental trees, some of which have tree preservation orders.

5.9 These woodland habitats are further afforded some protection with zones classified as High Spatial Priority bounding them and there are also identified areas that currently benefit from Woodland Improvement schemes.

5.10 The Parish also supports a considerable area of ancient grassland (defined as unploughed since 1840, see Table 3), as evidenced by the extensive preservation of Medieval ridge and furrow on many pastures (see Figure A2.3). This means that across any one of these pastures there is a rapid alternation of wetter and drier habitats. There are also areas of ancient woodland, three areas of traditional orchard together with the fluvial and lacustrine environments.

5.11 In the northern part of the Parish, the River Thames links directly to the Waterstock Local Wildlife Site which is home to otters and it is inevitable that these range into The Parish (Table 2). The River Thames wetlands, the flood plain and water meadows which flood annually, are an important nesting and wintering ground for birds, particularly waders such as flocks of Lapwing, Golden Plover and importantly the Curlew (a listed bird). In spring Marsh Harriers follow the flocks of Lapwing and Golden Plover that come into The Parish to feed in the flooded fields. The section of the valley between Waterstock and Shabbington that includes The Parish is designated as a hot spot for rare birds and animals that are species of conservation concern (SOCC). The River Thames, its tributaries and seasonal water meadows that line the main flood plain are thus an important contributor to biodiversity and the green infrastructure providing corridors and ecosystem services. Because of the annual flooding, any development is considered undesirable as the flood

defences and hard infrastructure would threaten the large-scale ecology of the River Thames flood plain both downstream and upstream. Great Crested Newts (listed) are recorded in the local ditches and ponds and link across the River Thames with similar environments in Ickford. The section along Ickford Road is part of the Great Crested Newt Conservation Priority Zone. Ponds in Milton Common previously had Great Crested Newts and an aim would be to encourage habitat re-creation.

5.12 These diverse habitats throughout The Parish support the following Protected or Notable species which are covered by the Natural Environment and Rural Communities Act (2006) Section 41 (s41), as given in Table 3.

Table 2	Section 41 Protected or Notable species in Tiddington-with-Albury
Mammals (terrestrial)	Badger, Brown Hare, Hedgehog, Otter
Mammals (bats)	Brown Long-eared Bat, Common Pipistrelle, Soprano Pipistrelle, Noctule Bat, Serontine Bat
Birds	Barn Owl, Bramling, Bullfinch, Buzzard, Curlew, Dunnock, Fieldfare, Gadwall, Golden Plover, Green Woodpecker, Grey Partridge, House Martin, House Sparrow, Kestrel, Kingfisher, Lapwing, Lesser Black-backed Gull, Linnet, Little Egret, Mallard, Marsh Harrier, Meadow Pipit, Mistle Thrush, Mute Swan, Nightingale, Red Kite, Redwing, Reed Bunting, Skylark, Song Thrush, Spotted Flycatcher, Starling, Stock Dove, Teal, Tree Sparrow, Wheatear, Whimbrel, Whitethroat, Willow Warbler, Yellowhammer
Amphibians	Great Crested Newt, Smooth Newt, Common Toad, Common Frog
Reptiles	Grass Snake
Fish	Bullhead
Invertebrates (Bees)	Red-tailed Mason Bee
Invertebrates (Moths)	Cinnabar
Invertebrates (True Flies)	Hornet Robberfly
Invertebrates (Beetles)	Sexton Beetle
Invertebrates (Molluscs)	Large Black Slug
Flowering plants	Annual Pearlwort, Bifid Hemp-nettle, Bluebell, Butcher's Broom, Common Cudweed, Common Vetch, Corn Marigold, Corn Spurrey, Field Scabius, Knotted Clover, Large-leaved Lime, Marsh Ragwort, Prickly Poppy, Ragged-Robin, Rye Brome, Stinking Chamomile, Wild Strawberry, Wood Club-rush

5.13 The policy therefore requires that all development proposals that lie within the Nature Recovery Network (shown at Figure 3), or that adjoin it, should consider how they may improve it, or at the very least do not undermine its integrity of connecting spaces and habitats. The Policy Map shows the full extent of the Network, which allows applicants to determine if their proposals should take this policy into account. Where proposals include provision for landscaping, new means of access or new layouts, there may be an opportunity to relate the land better to the Network, for example in complementing existing biodiversity value through the design of the landscape scheme. At the very least, the policy requires that proposals that will undermine the existing value of the Network will be refused permission.

5.14 The Network, and particularly the Tiddington Nature Recovery Corridor, may become more valuable over time, and although the majority of these features are physically attached to enable habitat connectivity, some features of the Network are not. This does not devalue their integral biodiversity or recreational value and at some point in the future an opportunity may arise to achieve similar connectivity. The Neighbourhood Plan also signals to the Responsible Authority that it should consider the role of this Network in its future Local Nature Recovery Strategy which is a requirement of the Environment Act 2021. Table 3 lists the identified habitats within The Parish.

Table 3		
Classified habitats and locations in Tiddington-with-Albury		
Site	Habitat	Description
a. Twenty Acres Field	Possible Priority Grassland	Historically named field, currently pasture containing ridge & furrow, within the Oxford Green Belt and directly links to the Ickford Pastoral Vale.
b. Fields	Possible Priority Grassland	Currently pastures, some historically named, containing ridge & furrow, some water meadows that link to the Oxford Green Belt and the Ickford Pastoral Vale.
c. Church Grounds	Possible Priority Grassland	Historically named field, currently pasture containing ridge & furrow. Preserves the course of the Roman road, the remnants of the Medieval settlement of Albury, the former course of Tiddington Brook and separates Albury and Tiddington.
d. Sixpenny	Possible Priority Grassland	Historically named field, currently pasture containing ridge & furrow. Preserves the course of the Roman road and separates Tiddington from Albury.
e. Fernhill Meadow	Possible Priority Grassland	Historically named field, currently pasture containing ridge & furrow, separates Albury and Tiddington.
f. Home Ground	Possible Priority Grassland	Historically named field, currently pasture containing ridge & furrow.
g. Grassy Ground	Possible Priority Grassland	Part of historically named field, currently pasture containing ridge & furrow.

h. Middle Meadow	Possible Priority Grassland	Part of historically named field, currently pasture containing ridge & furrow.
i. Fernhill Wood	Woodland	Part of historically named field, Fernhill Meadow, currently woodland containing relic ridge & furrow and connecting to ancient woodland.
	Ancient woodland	Mentioned in Domesday
ii. Tiddington Copse	Ancient woodland	Mentioned in Domesday
iii. Tadpole Copse	Ancient woodland	
iv. Long Copse	Ancient woodland	
Orchards	Traditional orchard	Area containing trees with preservation orders
v. Colesheath Copse	Ancient woodland	

5.15 These habitats are shown on the Nature Recovery Network Plan. Much of the rest of the woodland is classed in the Priority Habitat Inventory (Deciduous Woodland) and there are three areas of Priority Habitat Inventory (Traditional Orchard) at Spring Cottage, Rycote Park Farm and Hilltop Cottage.

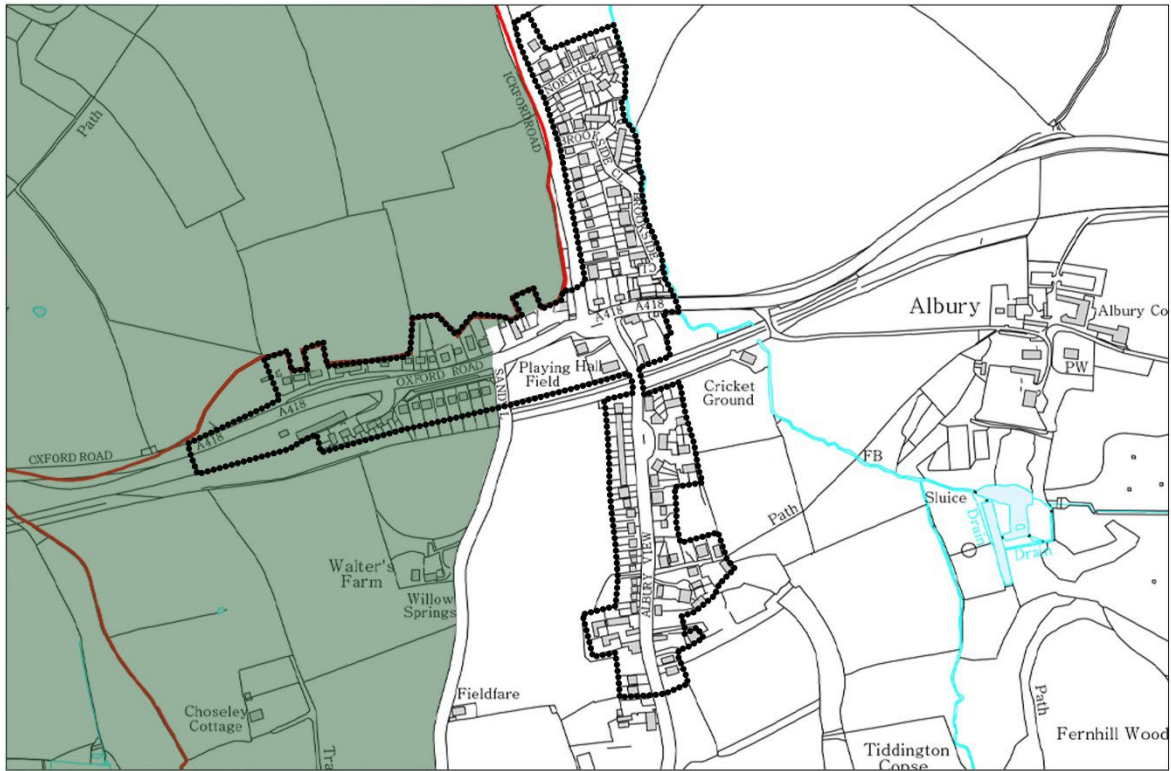
POLICY TwA2: VILLAGE BOUNDARIES AND INFILL DEVELOPMENT

- A. The Neighbourhood Plan defines Village Boundaries at Tiddington and Milton Common, as shown on the Policies Maps.**
- B. Proposals for infill development and redevelopment within the village boundaries that lie outside the Green Belt will be supported, provided they accord with the design and development management policies of the Development Plan. Proposals for development outside the village boundaries and outside the Green Belt will only be supported if they are consistent with Development Plan policies for the countryside.**
- C. Proposals for limited infill development and redevelopment within the village boundaries that lie within the Green Belt will be supported where they meet the requirements for development in the Green Belt and they accord with the design and development management policies of the Development Plan. Proposals for development outside the village boundaries that lie within the Green Belt will not be supported unless very special circumstances can be demonstrated or that they do not comprise inappropriate development in the Green Belt as set out in national policy.**

5.16 This policy defines on the Policies Map the village boundaries of Tiddington (Fig. 4) and Milton Common (Fig. 5) for the purpose of providing applicants, the local community, and the local planning authority with clarity on how development management policy should be applied in respect of distinguishing between the established built-up area and its surrounding countryside. This is consistent with a number of Local Plan policies to encourage sustainable forms of development in the rural areas.

5.17 Both Albury and Draycot are too small to have defined boundaries and, consequently, are considered as part of the open countryside. It is to be noted that only the western part of Milton Common lies in The Parish. The eastern half, to the east of the A329, lies principally in the Civil Parish of Great Milton with a small amount in the Civil Parish of Great Haseley.

5.18 The boundaries have been drawn using the conventions deployed by other local planning authorities that use this development management tool, but essentially, they follow the observed settlement edge formed by buildings, which have a clear functional relationship to each settlement. The policy does not affect the definition of each settlement in the settlement hierarchy of the adopted SODCLP, where the settlement of Tiddington remains defined as a ‘Small village’ and Milton Common as an ‘Other village’. In this Parish, parts of each village are ‘washed over’ by the Oxford Green Belt. Policy STRAT6: Green Belt of the SODCLP restricts development within the Green Belt to those limited types of development deemed appropriate by the NPPF in its §149 which allows for limited infilling in villages. SODCLP Policy H16: Backland and Infill Development and Redevelopment sets out that within smaller villages and other villages, development should be limited to infill and the redevelopment of previously development land or buildings. It also defines the term ‘infill’ and establishes that the scale of infill should be appropriate to its location.



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Tiddington-with-Albury Neighbourhood Plan

Tiddington Village Boundary




-  Parish Boundary
-  Green Belt
-  TwA2 Village Boundary

Fig. 4. Village Boundary of Tiddington



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Tiddington-with-Albury Neighbourhood Plan

Milton Common Village Boundary

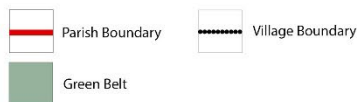


Fig. 5. Village Boundary of Milton Common

5.19 The policy requires that development proposals outside the defined boundaries are in line with the relevant policies of the SODCLP (Policies STRAT6: Green Belt, H1: Delivering New Homes, Policy H8: Housing in Smaller Villages) and Neighbourhood Plan in respect of ensuring the Green Belt continues to serve its key functions, protecting local landscape and character of the natural environment. The Neighbourhood Plan does not make any housing site allocations as the District Council has confirmed that the ‘indicative housing figure’ for the Parish is zero (as per NPPF §66). However, the boundaries will allow for infill opportunities for smaller homes on suitable sites as expected of a ‘smaller village’ by Local Plan Policy H16, enabling access to homes in The Parish suited to younger people and ‘downsizers’.

POLICY TwA3 LOCAL GREEN SPACES

A. The Neighbourhood Plan designates the following locations, as shown on the Policies Map, as Local Green Spaces:

Tiddington

- 1. Tiddington-with-Albury Recreation Ground**
- 2. Tiddington Cricket Club**

Albury

- 3. St. Helen's Churchyard**

B. Proposals for development within designated Local Green Space will only be supported in very special circumstances.

5.20 The policy designates a series of Local Green Spaces in accordance with §101 and §102 of the NPPF. The justification of how each space meets the three NPPF criteria is set out in Appendix 3. The policy has the effect of managing development proposals in line with the NPPF provisions in the Green Belt, which prevent any development of the land unless the ‘very special circumstances’ test can be met.

5.21 In addition to that area of the village in the Oxford Green Belt, this policy proposes three important green spaces in and on the edge of the settlements within The Parish, which lies outside of the Green Belt. These areas are largely privately owned but play an important role in creating the environment of each settlement that is enjoyed by the residents.

5.22 It is proposed that these spaces are protected from development by their designation as Local Green Spaces in accordance with §101 and §102 of the NPPF.

5.23 In each case, as described in Appendix 3, the spaces lie in close proximity to the local community, and none can be described as ‘extensive tracts of land’. All play an integral part in the enjoyment of The Parish and are therefore special to the local community.

5.24 There are also incidental open areas comprising the verges, particularly along the A329, A418 and the A40 that enhance the appearance of the main routes through The Parish. Preservation and correct maintenance of these will also aid habitats and biodiversity and have been identified as part of Policy TwA1 Nature Recovery as green infrastructure assets.

POLICY TwA4 FIRST HOMES

Proposals for a First Homes Exception Site will be supported subject to the following criteria:

- **the scheme is supported by robust evidence of demonstrable local needs and does not exceed 5% of the size of the existing settlement;**
- **at least one of the boundaries of the site entirely adjoins the settlement boundary of either Tiddington or Milton Common as defined by Policy TwA2; and**
- **it can be demonstrated that the scheme will avoid areas at risk of flooding and not cause unacceptable harm to identified Important Views or cause unacceptable harm to a designated heritage asset.**

5.25 Planning Practice Guidance allows for First Homes Exception Sites to come forward on unallocated land outside of a development plan but only within those parts of the Parish which do not lie in the Oxford Green Belt. This has been recognised by SODC in the recent publication of a First Homes Guidance Note October 2021. For those Green Belt areas only Rural Exception Sites can come forward. A First Home is defined as discounted market housing for first time buyers that must be discounted by a minimum of 30% against the market value in perpetuity and its first sale must be at a price no higher than £250,000 after the discount has been applied. The policy therefore sets out the criteria by which a First Homes Exception Site proposal should be determined as provided for by the Guidance.

5.26 In essence the policy reflects the spirit and intention of Policy H8 of the Local Plan which allows for a level of growth commensurate to the scale and character of the village, expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census during the plan period. The Parish Council considers that approximately 5% of growth is a level of growth commensurate to the scale and character of Tiddington as a small village with limited services.

5.27 It also accords with the Parish Council's desire to promote future developments that will address the imbalance of affordable housing in the parish. A minimum 30% discount on market value homes, capped at £250,000 on its first sale, ought to allow smaller and more affordable homes to start to rebalance the housing mix in the Parish. Given that owner-occupier dwellings account for 79% of dwellings in the Parish, with only 14% rented from a Housing Association or the Council, proposals may be supported which deliver other types of affordable housing for rent which meet local need as provided for by Planning Practice Guidance.

POLICY TwA5 HOUSING MIX

Proposals for new residential development should provide homes to address the nature of local needs and contribute to the objective of creating a mixed and balanced community. Proposals that recognise the need for smaller dwellings and comprise of two- or three- bedroom homes will be particularly supported.

5.28 The policy is intended to contribute towards a mixed and balanced community in line with §62 of the NPPF. It refines Local Plan Policy H11 on housing mix which is necessary to start to rebalance the current mix of homes so that it better reflects local housing needs.

5.29 The district council’s current evidence (the Oxfordshire SHMA 2014) show that the existing stock of larger homes in South Oxfordshire accounts for over a quarter of dwellings and smaller units with two or three bedrooms are preferred in the district. An analysis of the 270 dwellings in Tiddington-with-Albury in comparison with Oxfordshire and England shows them to be markedly skewed towards the higher tax bands, D-E with 82.7% in D-H, as shown in Figure 6.

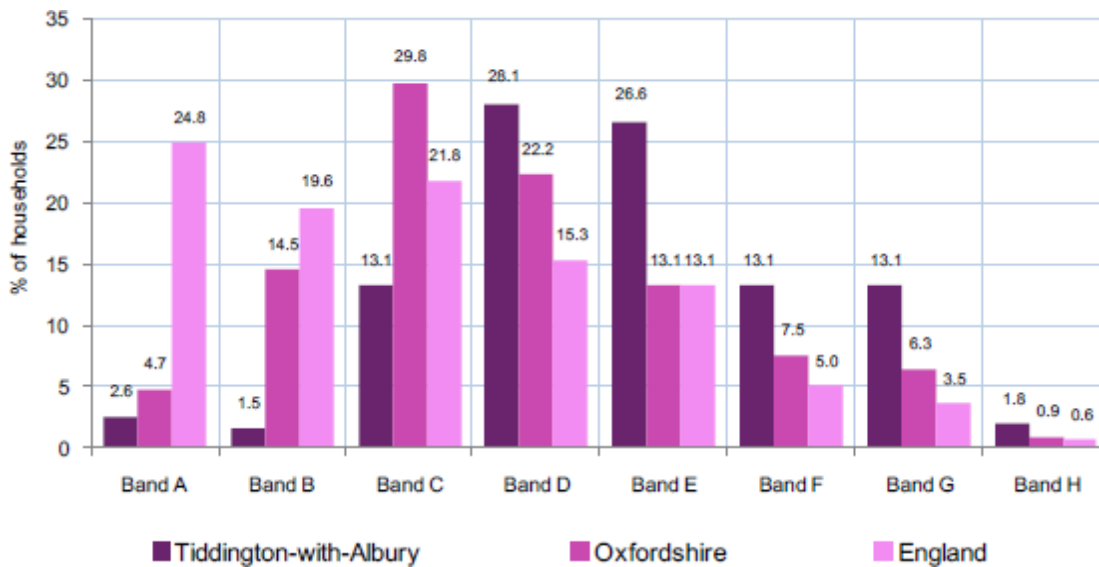
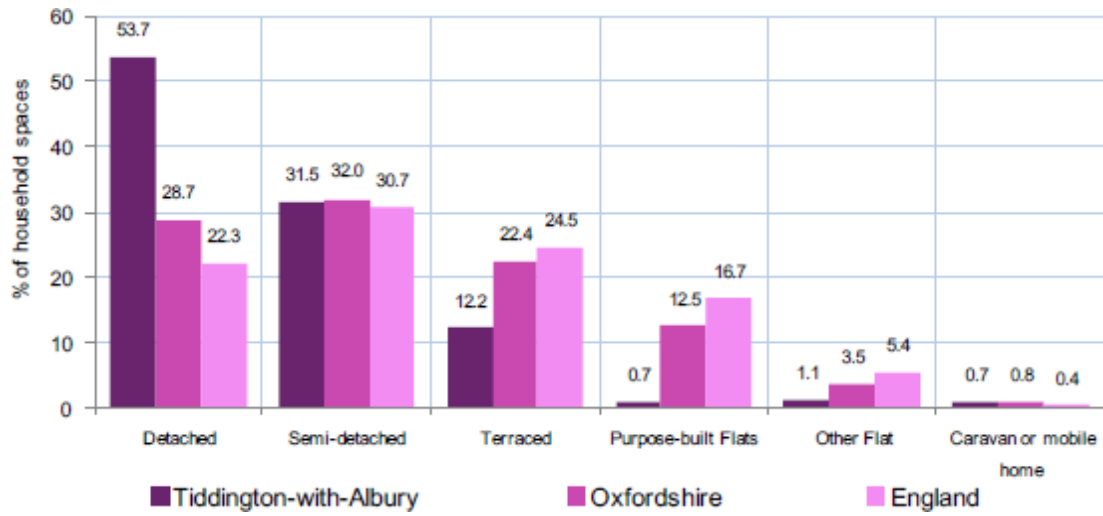


Figure 6 Dwelling stock by Council Tax band

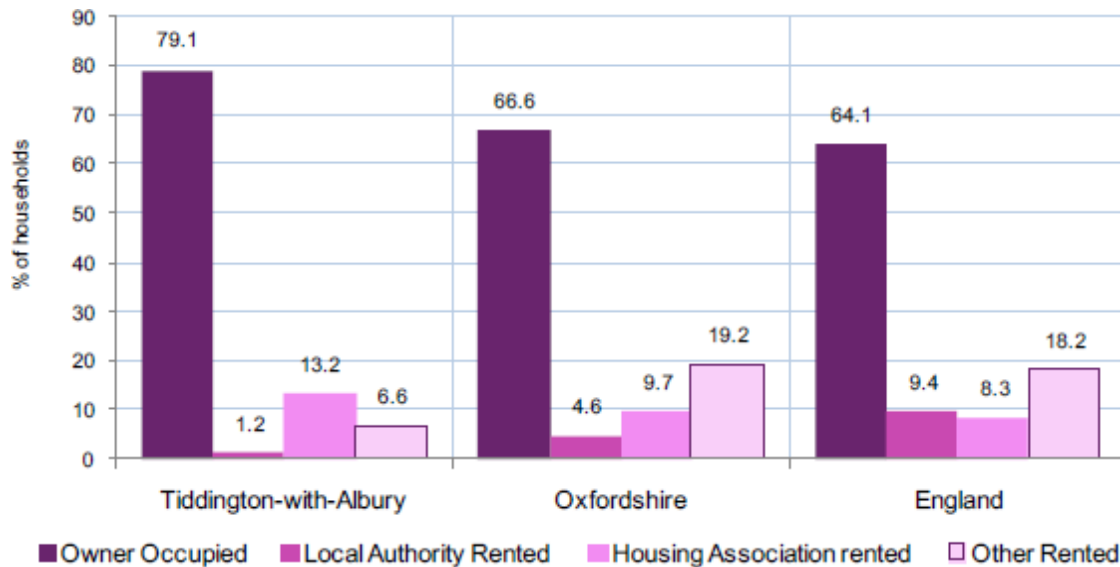
5.30 This translates to a marked skew with 84% of the dwellings detached or semi-detached larger, 4- and 5- bedroom houses. The majority of houses are detached and there is a distinct shortage in all other categories, as shown in Figure 7.

Figure 7 Dwelling type breakdown



5.31 Owner-occupier dwellings account for 79.1% with only 14.4% rented from a Housing Association or the Council, given in Figure 8.

Figure 8 Housing tenure breakdown



5.32 The policy therefore requires that new infill homes provided for by Policy TwA2, and Rural Exception Sites provided for by SODCLP Policy H10, comprises mainly 2- and 3-bedroom homes. It is necessary in order to start to rebalance the current mix of homes so that it better reflects local need. Over its lifetime, the plan may only marginally influence the balance of housing stock, yet it is considered to be a necessary step towards providing opportunities for younger people and ‘downsizers’ to be able to access housing which otherwise the market would not deliver.

POLICY TwA6 PROTECTION OF KEY VIEWS

A. The Neighbourhood Plan identifies Key Views on the Policies Maps as valued sightlines into and out of the Parish.

B. Development proposals should preserve and where practicable enhance the local character of the landscape and through their design, height and massing should recognise and respond positively to the various Key Views.

C. Development proposals which would have an unacceptable impact on an identified Key View will not be supported.

Details of the views are given in Appendix 4.

5.33 The policy, and Policies Map, identifies a series of views from public vantage points in the Parish that are considered an important element of preserving the character of the village and the surrounding landscape. Being constructed on the side of a low rising hill, The Parish has varying views across it and over open countryside to the Vale of Aylesbury and the hills to the north. Milton Common, on top of the hill and on the southern side of The Parish, has views to the Chiltern Hills to the south and east.

5.34 Certain views from public vantage points, both inside out and from outside into The Parish to iconic landmarks are very important to the community. Tiddington and Milton Common are both largely linear villages with houses mostly adjacent to open fields, whilst both Draycot and Albury are surrounded by fields. This open aspect of the village is considered desirable to retain by the residents.

5.35 Conservation of such views is an important element of preserving the character of the village and the surrounding landscape. Development which would obstruct such a view or which would lead to a detrimental impact on the view should not be permitted. Where views extend beyond the Parish, co-operation will be needed between adjacent parishes.

5.36 The policy does not seek to prevent any development lying within a view but requires that proposals recognise and take account of these in their design. These views are clearly shown on the Policies Map and have been grouped according to their settlement. In each case, only the minimum area of land necessary to define the view has been identified. Identification of important views will help to conserve our Parish's character and sense of place. These are identified on the Policies Maps

5.37 Each of the important views identified in this policy is shown on the Policies Map. A photograph, the direction in which the photo was taken, the elevation and grid reference of the viewing position is shown in Appendix 4.

POLICY TwA7 LOCAL GAP

- A. The Neighbourhood Plan identifies a Local Gap, as shown on the Policies Map, on the pastures between Tiddington and Albury for the purpose of preventing coalescence of the two settlements, and to protect their character and rural setting.**
- B. Development proposals within the Local Gap will only be supported if they do not result in an unacceptable harm, individually or cumulatively, to its open character.**

5.38 The policy defines an area of land between two of its settlements which plays an important role in preventing development that will undermine the visual integrity of the gap to the point that there is coalescence of these two distinct settlements, Appendix 3.8. The Local Green Space analysis shows that this area of land plays an important role in forming the separate setting within which each part can be appreciated and enjoyed.

5.39 Although the land lies outside the Village Boundary (as defined in Policy TwA2) that policy acknowledges that there are some types of development that are suited to the countryside which may be appropriate. However, this policy requires that its effects, by way of their location, height, and/or mass, – should not harm the function and purpose of the Local Gap. The land included in the gap is considered to make a significant contribution to maintaining the individual and rural character of the two adjoining settlements.

POLICY TwA8 COMMUNITY FACILITIES

- A. The Neighbourhood Plan identifies the following community facilities, as shown on the Policies Map, in the Parish:**

Tiddington

- i. The Fox and Goat Public House**
- ii. Tiddington-with-Albury Village Hall**
- iii. Tiddington Cricket Club**

Albury

- iv. St Helen’s Church**

- B. Development proposals which would affect the use of the identified community facilities, will be determined against the provisions of Policies CF1 (Safeguarding Community Facilities) and CF4 (Existing Open Space, Sport and Recreation Facilities) of the SODCLP.**

- C. Proposals to change the use of part of a community, open space, sport or recreation facility that is surplus to requirements will be supported where they will not undermine the overall viability and important of the community, open space, sport or recreation facility concerned.**

5.40 The policy supplements and refines existing development plan policies on community, open space, sport or recreation facilities to which the policies should apply and seeks to ensure that the long-term potential value of land in community use is not lost without good reason. Given the small nature of the settlements, the loss of any of these facilities would be

significantly detrimental, so even though a specific type of community use may no longer be viable, the opportunity to retain the premises or land in this use cannot be lost.

5.41 In addition to existing development plan policies which protect these facilities and encourage new facilities, the policy also allows for a partial change of use of a facility, it thus is intended to help secure its longer-term viability. This may be an important way of putting to use space that is no longer needed, but which can make a financial contribution to sustaining the facility. However, such changes must be shown not to undermine their community functions.

5.42 The Use Class Order of September 2020 now deems these uses as either Class F2 ('Local Community Uses') or in the case of St Helen's Church, F1 ('Learning and non-residential Institutions'). The public houses are now deemed '*sui generis*' (i.e. not included in any class of uses). A description of each facility and its community value is provided in Appendix 5. Collectively, these facilities in each settlement are cherished by the community and offer a valuable and vital resource to support community life, and therefore warrant the protection of policies.

TwA9 COMMERCIAL, BUSINESS AND SERVICE USES

A. Proposals to retain and improve the following commercial businesses and services, as shown on the Policies Map, will be supported, provided that they do not harm residential amenity and that they accord with other design and development policies of the Development Plan:

Tiddington

i. Tiddington Garage

Milton Common

ii. Double Tree by Hilton Oxford Belfry

iii. Camp Industrial Estate

iv. Foster & Gane

v. Axford Engineering and GB Sales

5.43 This policy aims to protect the few local commercial, business and service users in the Parish from unnecessary loss. Such uses form Class E, with the exception of some of the uses on Camp Industrial Estate which may contain some Class B2 and B8, of the new Use Class Order, allowing a change of use without the need for planning permission between what were formerly distinct retail, business and some leisure uses. They each provide an important service to the local community (and sources of local employment) meaning that fewer car trips are necessary to larger towns beyond the Parish. In an area of very high land values for housing, such premises are coming under increasing pressure. The policy complements SODCLP Policy EMP3 which also seeks to retain employment land.

TwA10 TRAFFIC MANAGEMENT AND TRANSPORT

Development proposals will be supported, provided that, where appropriate to their location, they deliver or make financial contributions towards the mitigation of traffic volumes and speed through the Parish related to their development, they do not introduce urbanising highways infrastructure into the village lanes and they are in accordance with the other relevant policies of the Development Plan.

5.44 In line with the views of the residents, the Parish Council strongly supports the regulation of the vehicles passing through The Parish in order to preserve its rural character.

5.45 The A40 through Milton Common acts as the link between the A418 crossing J8a of the M40 and the A329 which crosses at J7. The vast majority of traffic using these roads thus originates outside the Parish, much coming off the M40 or going onto it. Traffic data and other information is provided in Appendix 6.

A418

5.46 The A418 dissects Tiddington and links Aylesbury to the M40 and A40 at Wheatley. This is the main through commuter link to Oxford and links with the A34 that serves the south coast ports.

A40

5.47 The A40 through Milton Common that connects J7 with J8 is frequently used as a bypass of Junction 8 and when the motorway is closed.

A329

5.48 The potential Harrington development immediately abuts the southeast corner of the Parish and the suggested 6,000 homes to be built here would require a new road network and remodelling of J7, which has restricted access, to cope with the new traffic load generated.

5.49 There is a marked difference between these three A roads connecting to the M40 and the other five lanes in the village that are largely single track and either sunken or between hedgerows that have evolved from farming access tracks. Consequently, their usage is quite different but the desires of motorists to cut journey times has seen an increase in the use of the unsuitable lanes linking with the A roads as rat runs with passing sections having been carved out of the verges by vehicles, for example Sandy Lane as a shortcut to the A418.

5.50 Other than Ickford Road, which is narrow twin track, two largely single track lanes link Tiddington with Milton Common and Draycot with Waterstock. There is no provision for pedestrians. The other two lanes are both no through roads, one becomes a footpath and the other, an unclassified lane, becomes a bridleway.

5.51 Another serious problem is the increasing use of Ickford Road by HGVs from Oakley and Worminghall cutting out the use of the Thame by pass, despite the clear signs as to its unsuitability on the A418 and on the Ickford side. This urgently needs to be stopped due to the damage being caused to the Scheduled Ancient Monument.

5.52 77.3% of respondents considered that the impact of the Harrington development on the village would be unsustainable, whilst 75.6% considered it would make the village a less

attractive place to live.

5.53 69.7% of respondents considered that the present road system was inadequate to cope with the increased volumes of traffic generated by developments that have already taken place. Because of the position of the Parish, and despite the regular bus service, most residents (43% of respondents) use their own car or van to travel to work (49% of respondents were over 65 so most of these presumably do not work).

5.54 A high volume of vehicles is generated locally during rush hours which adds to the total amount of traffic. Outside of these hours there are local journeys accessing shops and other facilities outside The Parish. New requirements in Thame to provide an additional 775 new homes, land for retail development and land for employment, together with plans in Buckinghamshire to expand the Haddenham Business Park, will inevitably bring additional traffic on both the A418 and the A329. The Parish Council encourages Oxfordshire County Council (OCC) to consider reducing the speed limits and introducing traffic calming measures on both the lanes and the main roads through The Parish.

5.55 This policy is aimed at preserving the rural lanes of The Parish as safe havens for walkers, cyclists and equestrians. These lanes are increasingly used by drivers as a short cut between the main A Class roads and there is considerable concern within The Parish at the prospect of further increases in the current volumes and speed of traffic would have.

5.56 The roadside verges are seen as an opportunity that maintains the character and biodiversity of The Parish and the Parish Council urges OCC to adopt a policy for their proper maintenance.

Bridleways and footpaths

5.57 There is one stretch of bridleway and a number of public and permissive footpaths that connect various parts of the Parish. These are all utilised by residents and the long-distance paths of the Oxfordshire Way and the Thames Valley Walk, pass through the Parish.

Ickford Road and Ickford Bridge

5.58 There are concerns over the increasing volume of HGV traffic, particularly articulated HGVs, which ignore the advisory unsuitable for HGV and width restriction traffic signs and continue to cross over the Scheduled Ancient Monument of Ickford Bridge into Buckinghamshire. This bridge is protected from damage by law, but this protection has not been applied. It is clear that any further developments on Ickford Road, in Ickford and the surrounding villages, will inevitably increase the traffic.

Waterstock Golf Course development

5.59 The proposal for Waterstock Golf Course and the fields to Ickford Road as a major goods logistics hub and housing development, on the western side of the village has come after the NP Questionnaire (NPQ) was circulated, but the concept would not be supported by either the responses to the questionnaire or the Parish Council. The open farmland immediately to the northwest of the village centre, bounded by Ickford Road and Oxford Road, is in neighbouring Waterstock, but makes an important contribution to the rural character of Tiddington-with-Albury. The rear border of the Ickford Road allotments is also the eastern edge of the Oxford Green Belt. Adjoining this land to the west, within Waterstock CP, and within the Green Belt, is Waterstock Golf Course. This provides a recreational amenity not only in terms of a golf course and driving range, but in its network

of tree-lined public footpaths. To the north of the golf club land is the River Thame and its designated local wildlife site. Both the open farmland and the golf course are under threat of development and have variously been proposed as both a major distribution and office hub, and as a large housing development approaching the size of the local market town Thame, or as a combination of these elements.

5.60 Any development of the farmland or the tree-covered golf course, would be a major loss of open Green Belt land and of a sports facility which contributes strongly to the character of the wider community not just the adjacent parishes. It is considered that this proposed development would have a deleterious effect on the Parish and its surrounds. It would directly lead to a further significant increase in the volume of heavy transport using the A418 through Tiddington as well as adversely affecting Milton Common via the A40 connection to J7 of the M40 with its accompanying noise, pollution and hazards. There would also be an increase in rush hour commuter traffic caused by the employees at the facility. In line with the wishes of the responses to the Neighbourhood Plan Questionnaire, the Parish will join with and support efforts by Waterstock to resist this development.

Air quality

5.61 Any increase in the volume of heavy transport using the A418 through the village will adversely affect air quality and contribute to noise pollution. Residents have identified the need for a safe cycle track along the A418.

POLICY TwA11 DARK SKIES

Development proposals should conserve and enhance relative tranquillity in relation to light pollution and dark night skies.

Development proposals should also demonstrate that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance (CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations), or any equivalent replacement/updated guidance for lighting within environmental zones.

Development proposals which include lighting should ensure that:

- **the measured and observed sky quality in the surrounding area is not reduced;**
- **the lighting concerned is not unnecessarily visible in nearby designated and key habitats;**
- **the visibility of lighting from the surrounding landscape is avoided; and**
- **building designs should avoid large areas of glazing which would result in light spillage into rural and unlit areas.**

5.62 Light pollution has a proven deleterious effect on wildlife and also to humans and, as most of the roads in The Parish have no or minimal lighting, the area has dark skies. This also extends north to Waterstock and over the valley of the River Thame where Ickford are

in the same position (see Figure 9).

5.63 The benefits of a dark night sky are wide-ranging and include:

- Enjoyment and appreciation – improving quality of life and providing creative inspiration
- Health – promoting better sleep patterns and reducing stress
- Wildlife – supporting a more natural environment for both nocturnal and diurnal animals
- Tourism – boosting numbers in the quieter, darker months, including outside traditional visitor hotspots
- Educational outreach – potentially including formal education and more informal activities
- Scientific advantages – enhancing conditions for astronomy
- Energy efficiency – reducing wastage from unnecessary or excessive lighting

5.64 The dark skies are largely considered to be a valued asset by residents and development proposals should avoid degrading it. The current nil to minimal street lighting within The Parish is preferred by residents. The Tiddington-with-Albury dark night skies area has been progressively degraded and reduced over the last 10 years by the new developments at Thame and the changes of lighting on the M40 and at the Oxford Services.

5.65 Despite NPPF Paragraph 185c stating that planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation, additional extensive residential developments on the western side of Thame will only further add to the degradation of this dark environment. The potential developments associated with the Harrington and Chalgrove proposals and particularly the potential transport hub at Waterstock, all with the addition of considerably more night-time lighting would individually or collectively substantially degrade this position for The Parish and the adjacent parishes unacceptably. The policy therefore sets out criteria to ensure that new development seeks to protect the dark night sky. In doing so, it reflects the purpose and objectives of SODCLP Policies ENV11 and ENV12 on Pollution.

5.66 To help achieve these objectives the policy is designed to guide decisions on new and replacement lighting and help private householders and businesses make the right lighting choices. For all proposed developments, factors that will be considered when deciding the appropriateness of artificial lighting, include the location, the hours of operation, the quantity of lights proposed, brightness and control, and direction of the beam. Appropriate mitigation and control measures secured by planning conditions to prevent unnecessary light pollution include:

- a. The use of ‘curfew hours’ (12pm – 6am) through automatic timers, and night-time dimming;
- b. The use of proximity infrared motion sensors, timers or any additional shielding or coving, including angling the front surface of lights to below the horizontal;
- c. The use of different surface types to reduce the amount of reflectivity;

- d. Screening or shielding to reduce the impact of reflectivity; and
- e. Reflect the latest best practice guidance on light types in terms of lumens, wattage, angle, height, colour, warmth, etc.

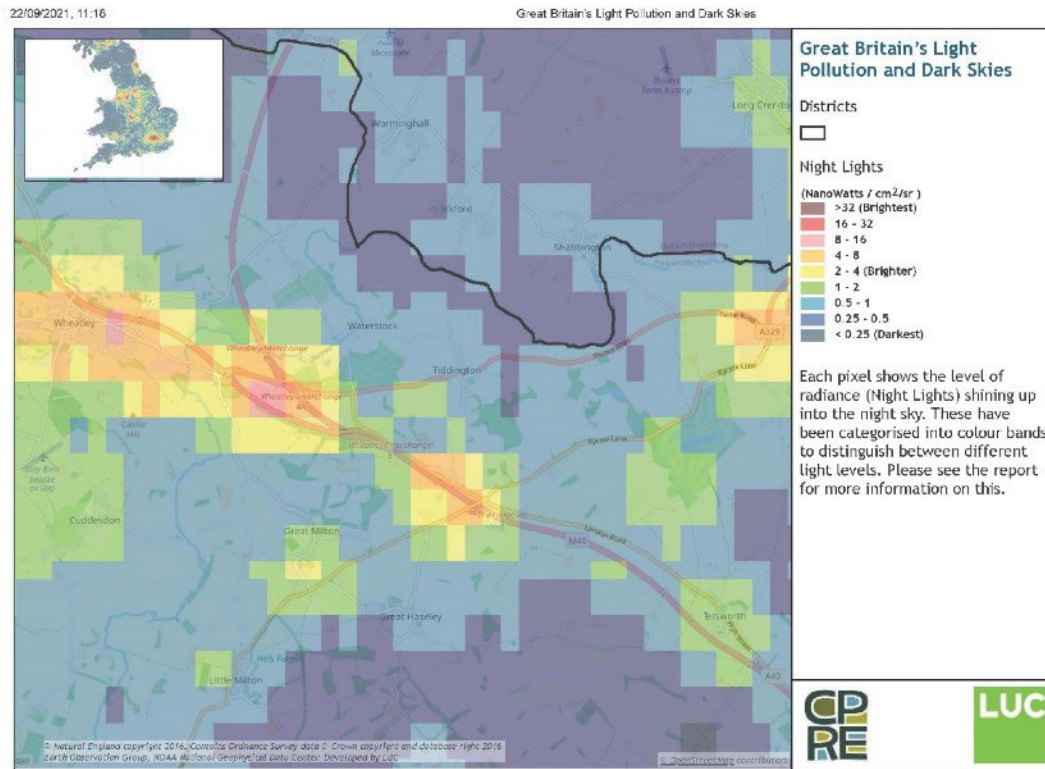


Figure 9 Light Pollution and Dark Skies in The Parish and surrounding area

6. IMPLEMENTATION

6.1 The Neighbourhood Plan will be implemented through South Oxfordshire District Council consideration and determination of planning applications for development in the Parish.

Development Management

6.2 The Parish Council will use a combination of the Local Plan and this Neighbourhood Plan to inform and determine its planning application decisions. The Parish Council is a statutory consultee on planning applications made in the Parish and it will be made aware of any future planning applications or alterations to those applications by the planning authority. It will seek to ensure that the Neighbourhood Plan policies have been identified and applied correctly by applicants and by officers in their decision reports.

6.3 Where necessary, the Parish Council may seek to persuade the Secretary of State to call-in a planning application that it considers is in conflict with the Neighbourhood Plan but which the planning authority has deemed to consent. Similarly, it may also seek to persuade the Secretary of State to recover an appeal of a refused application, where the conflict with one or more Neighbourhood Plan policies has been important in the reasons for refusal. In both cases, the Parish Council will do so if it considers matters of national policy significance (for neighbourhood planning) are raised.

Local Infrastructure Improvements

6.4 Although the scale of development in the parish that might be given consent during the plan period is likely to be very limited, there may be opportunities through S106 agreements (or through the Community Infrastructure Levy) to secure financial contributions to invest in improving local infrastructure. Should an opportunity arise, the Parish Council will review the evidence base and community consultations for the Neighbourhood Plan to inform its view in liaising with the local planning authorities. A preliminary list has been set out below:

- i. A safe cycle track along the A418, particularly towards Thame;
- ii. Setting up of a wildlife corridor to link with Waterstock and Ickford, the Tiddington Nature Recovery Corridor;
- iii. Reduce the speed limits and introducing traffic calming measures on the lanes and main roads through The Parish;
- iv. Introduce solutions to mitigate the destruction of road verges, provide proper road verge maintenance and avoid the introduction of urbanising highways infrastructure.

Design Codes and Local Heritage Assets

6.5 Vale of White Horse and South Oxfordshire District Councils adopted their Joint Design Guide Supplementary Planning Document (SPD) in June 2022. The Parish Council decided that neighbourhood design coding would not be undertaken whilst this plan was emerging to avoid any duplication of work. Any outstanding design matters will be considered as part of a review of the Neighbourhood Plan.

Monitoring and Review of the Plan

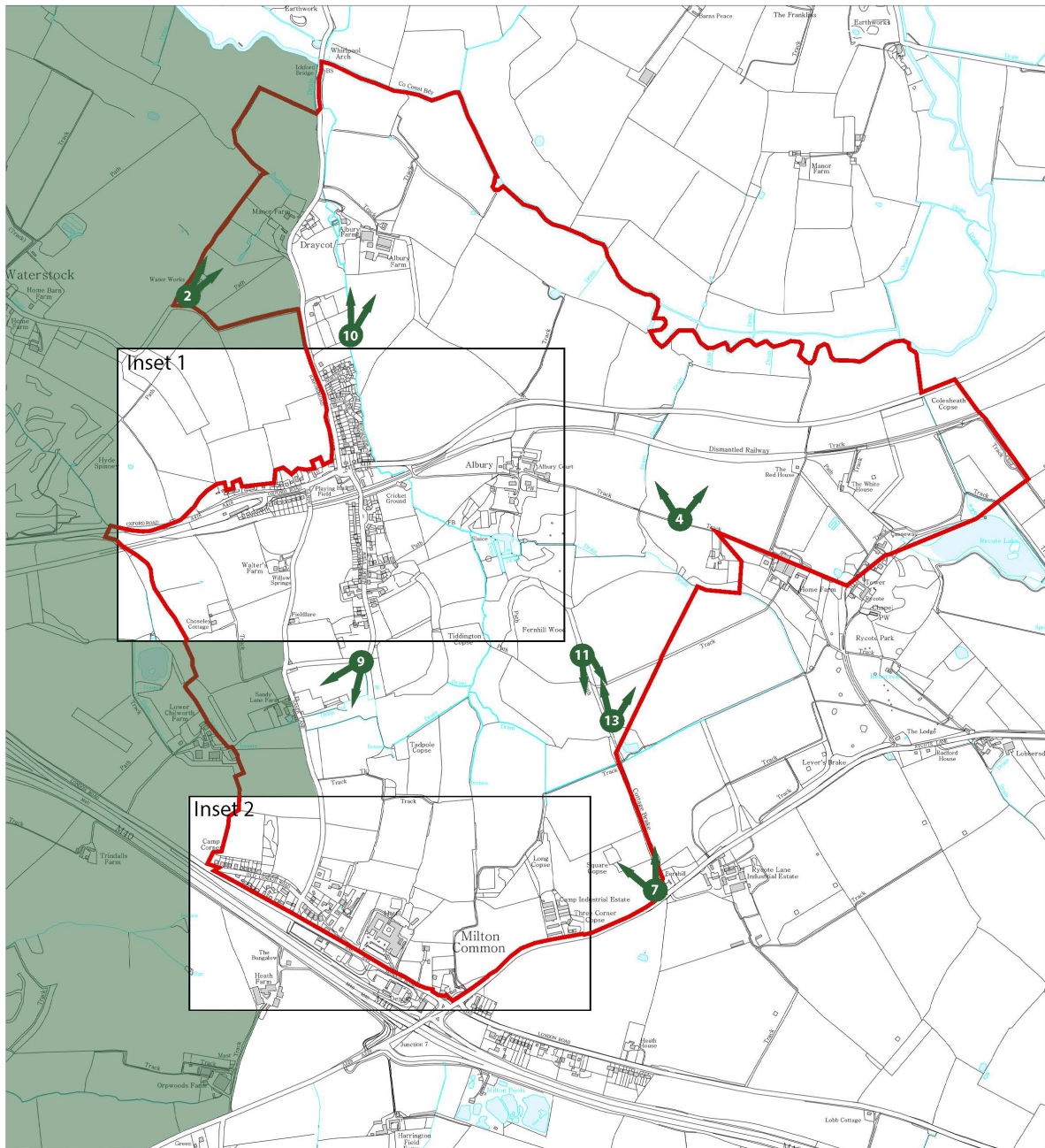
6.6 The Parish Council will monitor planning decisions to assess the effectiveness of the Plan's policies. Where necessary it will have discussions with the District Council to ensure that day-to-day decisions on planning applications take account of the vision, objectives, and policies of the Plan.

6.7 The Parish Council acknowledges that policy context for the Plan may change within the Plan period. The adoption of the emerging Local Plan (covering the period up to 2041) will be a key factor. On this basis the Parish Council will consider the need or otherwise for a partial or full review of the Plan either within 5 years from its making or within 6 months of the adoption of the emerging Local Plan (whichever occurs first).

Other Non-Planning Matters

6.8 During the preparation of the Neighbourhood Plan, there have been many ideas for improving or addressing current problems in the Parish that lie outside the scope of the land use planning system. These aspirations will be managed by the Parish Council together with the relevant village committees and/or newly developed interest groups.

POLICIES MAP & INSETS

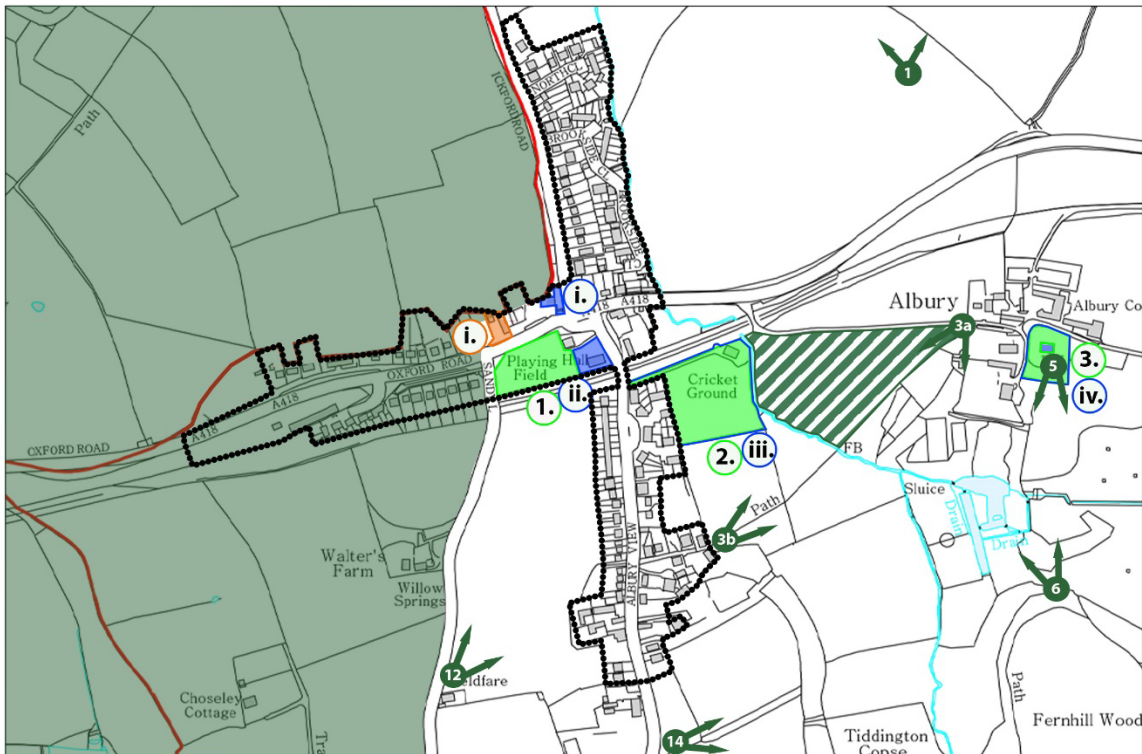


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Tiddington-with-Albury Neighbourhood Plan

Policies Map

- Parish Boundary
- Green Belt
- TwA6 Key Views



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Tiddington-with-Albury Neighbourhood Plan

Policies Map Inset 1



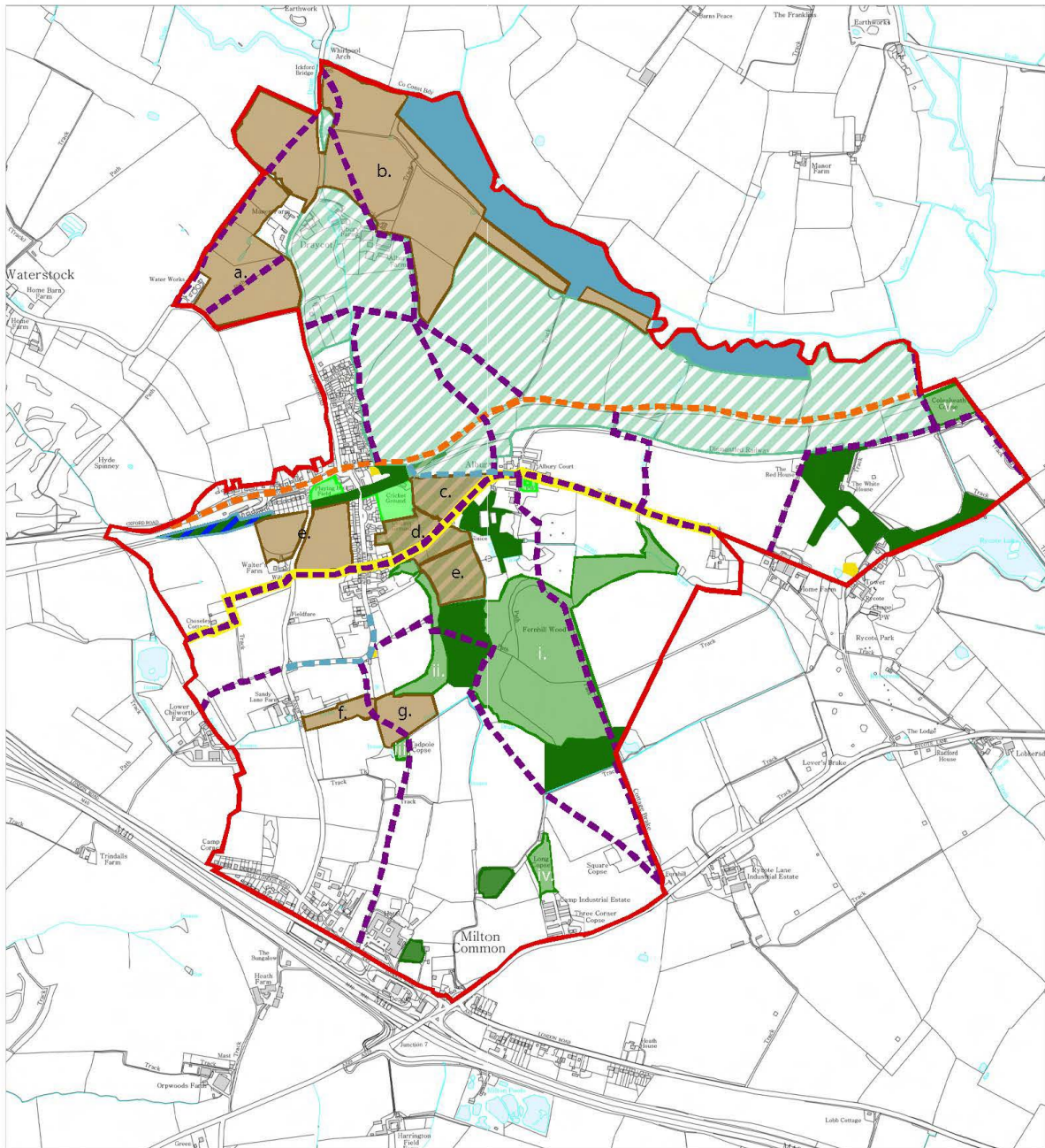


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Tiddington-with-Albury Neighbourhood Plan

Policies Map Inset 2

- | | | | | | | | |
|---|-----------------|---|------------|---|-----------------------|---|--|
|  | Parish Boundary |  | Green Belt |  | TwA2 Village Boundary |  | TwA9 Commercial, Business & Service Uses |
| | | | | | | | Milton Common |
| | | | | | | | ii. Double Tree by Hilton Oxford Belfry |
| | | | | | | | iii. Camp Industrial Estate |
| | | | | | | | iv. Foster & Gane |
| | | | | | | | v. Axford Engineering and GB Sales |



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Tiddington-with-Albury Neighbourhood Plan

Nature Recovery Network Plan



APPENDIX 1.

THE TIDDINGTON-WITH-ALBURY NEIGHBOURHOOD AREA

A1.1 Parish Rural Setting

A1.2 Tiddington-with-Albury History

A1.3 Parish Life

A1.4 St. Helen's Church

A1.5 Parish Challenges

This Appendix, in conjunction with Section 2 of the main text, describes the setting of The Parish, its history and development, general life and essential challenges for the future that may assist decisions affecting the planning and style of any proposed development to complement the existing buildings.

A1.1 Parish Rural Setting

The Parish is entirely rural and originated from two Medieval manors, those at Albury and Tiddington, and has been dominated by agriculture since records began. Most original properties were based around agriculture comprising farm houses and workers cottages. Historically there was a forge at the crossroads on the Oxford to Aylesbury road and there was also the facility to grind grain at Tiddington Mill. The public house, variably called the Fleur de Lys, the Fox, and now the Fox & Goat, is also located here.

Parishioners consider it desirable to retain the remaining working farms in order to maintain the rural character of the Parish, which is surrounded by similarly rural parishes that also desire to retain this character. These are the Oxfordshire parishes of Waterstock, Great Haseley and Great Milton together with Ickford and Shabbington in Buckinghamshire. There is no connecting development between any of them (see Fig. 1 of the main text) and this rural position creates an inviting place to live, reflected by 75% responding to the NPQ.

The Parish straddles the south-eastern boundary of the Oxford Green Belt and is on the southern side of the Ickford Pastoral Vale, part of the western end of the Aylesbury Vale Landscape. There are views and access to the north towards Brill and the Vale of Aylesbury, and to the southeast to the Chilterns Area of Outstanding Beauty.

The dominant, visible, archaeological characteristic of the lower part of the Parish is the Medieval ridge and furrow which covers the majority of pasture, with the exception of a few areas of water meadow along the banks of the River Thames. This preservation attests to a major change in the nature of the agriculture from extensive divided arable strips with a rotation system to the modern superimposed field system of largely pasture. Some areas of ridge and furrow and, as a consequence the ancient environments that preserved, have been lost to development and to modern ploughing.

The original development was as two small nucleated settlements with a few scattered houses in the fields between. Albury continued to decline whilst Tiddington moved from a small nucleated settlement on the hill to the present cruciform linear settlement that is strung out along both sides of the A418 with subsidiary modern linear development on the east side of Ickford Lane to the north and on both sides of Albury View/Fernhill Close and the extension, an un-named lane (Bridleway 15) continuing to the south.

The third area, at Milton Common, is largely a 20th century linear development located along the former course of the A40 from its junction with Sandy Lane to the junction of the A329, where there was an old coaching inn, now The Three Pigeons.

The area of Draycot comprises a small group of scattered, older houses and a modern farm.

The Great Western Railway branch line from Oxford to Princes Risborough and Wycombe was built in 1863 and brought minor expansion with the construction of Tiddington Halt. The railway was closed in 1963 and this afforded some scope for development with parts of the station yard becoming housing and part a caravan business. The disused railway line is used as a footpath and offers possibilities for the development of a green route between Wheatley and Thame.

The housing expansion commenced after WWI but the majority has occurred after WWII. This post-WWII development has occurred largely as infill development of small paddocks and large gardens within the main linear structured area of Tiddington or as new build, the largest development being the housing on the eastern side of Ickford Road. There was also piecemeal linear housing development on the west side of Albury View. On the eastern side of Albury View, called Fernhill Close, social housing was constructed which was rebuilt in the 1990s and is now a mixture of social and private properties. Other than the realignment of the A418, there has been little change to the basic 17th-18th Century development around the crossroads at the centre of Tiddington.

Many of the original dwellings were agricultural and most were thatched. These, together with some of the old farm houses (e.g. Manor Farm, and Walter's Farm in Tiddington, and Manor Farm, Draycot) are now used as family homes. Church Farm (Albury) has become a small business centre. More recent development has included small infill areas such as Manor Farm Close, in the former farmyard, further reflecting the change in economy of the Parish.

Money to construct a school was bequeathed in 1786, but this appears to have covered renting various premises in Tiddington and Albury for use as a private school. Tiddington National School was constructed in School Lane in 1870 able to house 44 children. In 1926 this became Tiddington-with-Albury Church of England Primary School. This continued until its closure in the 1960s.

A1.2 Tiddington-with-Albury's History

There are both Iron Age and Romano-British settlement and structures that have been proven through excavations at Camp Corner and are likely to be associated with a Roman road running across the Parish that connected the Roman town of Dorchester with Fleet Marston on Akeman Street. The road is documented as passing on an alignment from near Lower Chilworth Farm, on the south-western boundary of The Parish, across Sandy Lane and takes the course of the footpath along School Lane up to Albury, from here it passes through Church Farm down to the A418. It then followed a hedge line to a ford in the River Thame on the north-eastern boundary of the village, after which it continued to Shabbington and Long Crendon beyond.

A well containing Romano-British artefacts is recorded at Tiddington House and there is a general scatter of domestic potsherds at Albury and in the fields between Sandy Lane and Camp Corner.

Whilst the Domesday records for Albury commence with William FitzOsbern, those for Tiddington show that the Saxon owner, from the time of Edward the Confessor, was a person called Alwi and provides the oldest record of a Lord of the Manor in the Parish.

Records from 1209 indicated named persons as Rector and Vicar, clearly suggesting that there was a religious building. It is thus quite possible that this went back to Saxon times when a major spread of Christianity occurred in England.

Medieval records from 1254 show that both the River Thame and Tiddington Brook were used for fishing.

Whilst the former location of Medieval Albury was lost, the modern LiDAR imagery (Figure A2.3) shows the outline of the village as being extremely well-preserved.

Ickford Bridge is first mentioned in 1287 and this Medieval structure was reconstructed in 1685 and Whirlpool Bridge, on the Buckinghamshire side, was renovated in 1880. Together with the causewayed approach from Tiddington, these structures form a Scheduled Ancient Monument that requires better protection from the damage it is suffering.

Records from Domesday to the 17th Century describe various coppices and woods confirming their antiquity. A manor house, Tiddington House, was constructed in the 17th Century which was substantially modified in the 18th.

Milton Common was on the London Turnpike and housed a gibbet used for hanging highwaymen. The last person to be so treated, prior to 1894, was called Price.

The village economy has always been based on agriculture with the farms being variably tenanted or directly owned. However, in the Middle Ages it seems that Albury's importance waned leaving behind the current cluster of large houses by the church and the traces of settlement in the field known as "Church Ground". Tiddington's importance grew again, probably because of the proximity of the main road between Oxford and Aylesbury.

A1.3 Parish Life

Because of the positioning of three of the population centres, the life of the Parish is dominated by the A418 that runs east-west through it. To the west of the Parish it links to J8a (Oxford Services) of the M40 and the A40 and to the east it links to Thame and Aylesbury and on to the A41 and M25, enabling traffic to bypass the difficulties frequently encountered at the junction of the M40 and the M25 (see Appendix 6).

The hazards for pedestrians crossing the A418 have recently been alleviated with the installation of a Puffin crossing. This has been provided ahead of the expected rise in HGVs using the road as part of the construction of HS2.

Milton Common, on the south-eastern boundary of the Parish, is split between three different parishes. It lies immediately adjacent to the M40 J7 at the crossing of the A329 (see Appendix 6). The A329 links traffic crossing the M40 at J7 to Thame and Wallingford, as highlighted by the Little Milton Neighbourhood Plan.

Prior to the construction of the M40, the A40 through the Parish was realigned to the south, to bypass the main settlement area of Milton Common.

The other five roads in the parish are all unclassified country lanes, often single track, with those sections ascending the hill being sunken between high banks.

The network of footpaths, which include two long distance paths, and the one bridleway are all regularly used by residents and visitors.

Mass transport is provided by two bus services. The most frequent runs between Oxford and Aylesbury along the A418. This provides a link to the fast rail connections to London and the Midlands via Haddenham & Thame Parkway (approximately 6 miles to the northeast), Oxford and Aylesbury.

A second, far less frequent service, passes along the A40 at Milton Common and connects High Wycombe and Oxford.

There is no public transport between the areas of settlement and residents are concerned over the increase in the use of the unsuitable, narrow, mostly single-track lanes, as short cuts between the three main A roads.

The Parish includes and is surrounded by four working farms but, whilst there is agreement that it is desirable to keep them, they do not form a major source of local employment. Most of the working residents travel outside the Parish to work and a small percentage work from home. For this to continue and to expand the Parish is totally dependent on access to high-quality fibre-optic broadband. The lack of provision of this is recognised as a problem within the SODC area and the council aspires to improve this substantially, thus expanding opportunities to work from home.

Despite the growth in the number of residents, the Parish now has no basic facilities or services, having progressively lost its school in 1966 and its Post Office and shop in 1976. This forces residents to rely on facilities in Wheatley, Thame and Oxford for health, education, business and retail requirements. There is now a travelling PO van that visits Tiddington for 1 hour per week.

The Parish has a Village Hall that is equipped with a kitchen and a licensed bar, together with a large car park, making it a meeting place that is available for hire. This facility supports the activities of the Women's Institute and local providers such as a fitness club, Harvest supper and other Church and community functions.

Attached to the Village Hall is a children's play area and a playing field that is used for village functions such as the village fête, charity car boot sales, training for the annual tug-of-war against Ickford, etc.

There is a thriving, cricket club that provides the village with a strong summer focus, regularly getting to the National rounds and once reaching the finals of the Village Knockout Cup.

A1.4 St. Helen's Church

The church at Albury was probably already built by the 12th Century as records from the early 13th Century show that both a rectory and vicarage were already present, although the living was not considered very good. In the middle of the 13th Century the records show that the living was attached to Studley Priory, but was considered under the demesne of Tiddington. Further, this record describes the religious building as a chapel.

The old church, at some time dedicated to St. Helen, was largely removed in 1828 and the present reconstruction dates from 1830.

The churchyard provides open green space with far reaching views and many of the folk buried there still have family in The Parish. In common with many village churches, the weekly service attracts a small congregation of 10-15 mostly retired folk. This is significantly increased for celebration services including Christmas, Easter and Harvest. It is part of the Benefice of Wheatley and shares a rector with the other village churches in the Benefice - Waterstock, Waterperry and Holton. The church comfortably holds around 50 people. It is a popular local feature and village fundraising in recent years has resulted in much refurbishment including decorating, new heating and lighting systems. As a pretty country church it is popular for weddings. It is recorded in 1552 as having two bells and presently has two, one cast in 1686 and the other, still used, dates from the 1700s. It has a working pipe organ.

APPENDIX 2

LANDSCAPE, ENVIRONMENT AND CONSERVATION

Contents

1. GEOLOGY, LANDSCAPE AND TOPOGRAPHY

2. HYDROLOGY

3. LAND USE

4. BIODIVERSITY AND HABITATS

5. REFERENCES

A2.1 GEOLOGY, LANDSCAPE AND TOPOGRAPHY

The geology of The Parish is relatively simple, with the area underlain by a mixture of Jurassic (213-144 million years ago) and Cretaceous (144-65 million years ago) soft sandstones and mudstones that comprises part of a dissected secondary scarp below the main Chiltern chalk escarpment to the east.

The northern parts of The Parish are underlain by the clays of the Jurassic Kimmeridge Clay Formation (155-149 million years ago) which is overlain to the south by sands of the Cretaceous Lower Greensand Group (125-110 million years ago) succeeded by clays of the Gault Formation (110-100 million years ago) at Milton Common. Patches of Plateau Gravels (Pleistocene <2 million years old) occur sporadically across the higher land in the south.

This layer-cake sequence is cut through by the essentially north-south valley of Tiddington Brook which is partially filled with Pleistocene Head deposits and modern alluvium. This valley leads down to the alluvium-filled valley of the River Thames.

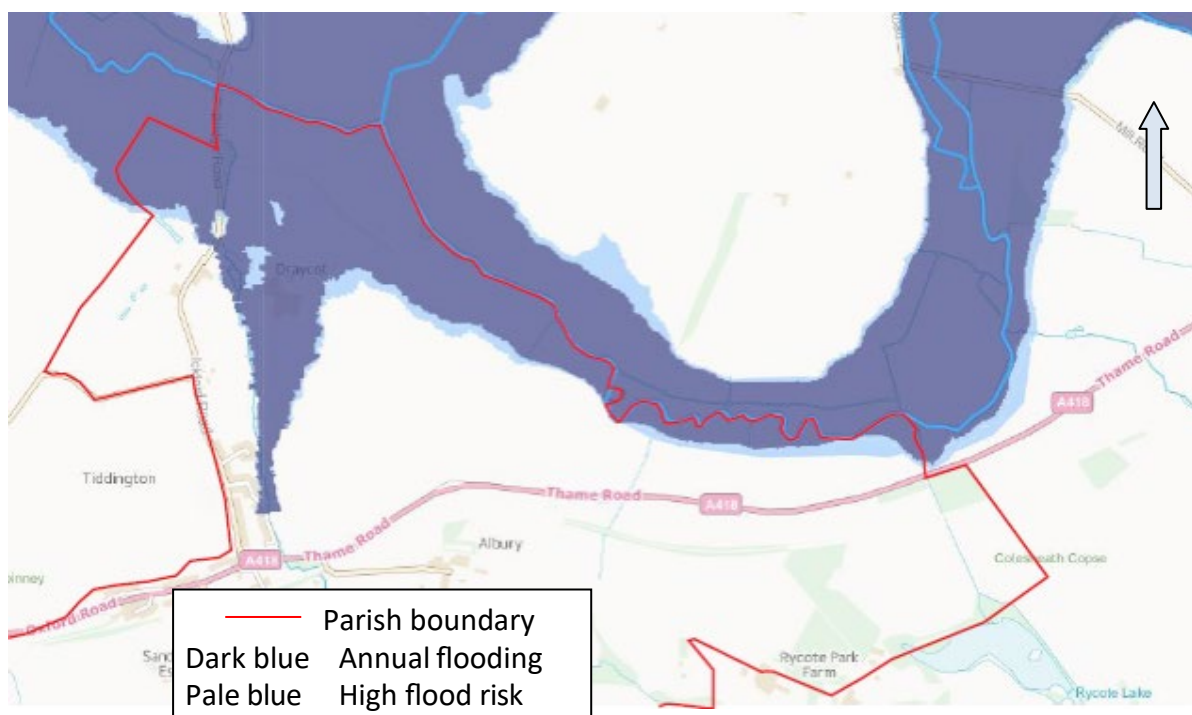
These easily eroded rock units lead directly to the gently sloping topography that essentially descends from Milton Common, approximately 105m AOD (high above sea level) into the River Thames valley at 55m AOD.

A2.2 HYDROLOGY

The northern parts of the parish, lying on the Kimmeridge Clay, are low lying and form part of the flood plain of the River Thames into which several small streams flow. These form an integrated system that runs through The Parish and controls a number of the habitats (see Policy TwA1 Conservation of Biodiversity and Wildlife Corridors).

The fields on the River Thames flood plain are prone to annual flooding during the winter months and fall into the Environment Agency Flood Areas 3 and 2, as shown in Figure A2.1.

Fig. A2.1 Environment Agency flood zones



The nature of the annual flooding of the River Thame is shown in Figure A2.2

Fig. A2.2 River Thame flood plain January 2021



Any developments within the Environment Agency Flood Area 3 would require considerable defences that would irrevocably change the nature of the habitats and have an immediate, damaging effect on the Ickford Pastoral Vale to the north.

Draycot and the section of The Parish on Ickford Road lie in the valley of Tiddington Brook near its confluence with the River Thame and are particularly prone to flooding. A section on Ickford Road outside Manor Farm, also floods in heavy rain due to the fact that at periods of high water the land is only just below the level of the water table.

The streams have courses that meander, some of which have been straightened and realigned to conform to enclosure field boundaries. For example, the original course of Tiddington Brook is preserved below the Medieval village of Albury, see Appendix A3.8.

All streams eventually lead to the River Thame, the valley of which dominates the area. The river regularly floods and a strip of the land along the banks has, since Medieval time, been recognised as water meadows as the ridge and furrow can be seen to terminate abruptly where this flooding is prevalent, see Fig. A2.2.

Of recent times this flooding appears to have become more extensive and presumably reflects the increased run-off generated by the impermeable surfaces laid down during the continual expansion of Aylesbury, Thame and the intervening villages.

The Parish Council recognises that the issue of flooding of the River Thame and Tiddington Brook is an annual event which largely cannot be prevented but should not be exacerbated.

This involves three elements; 1) avoiding flooding downstream, outside the Parish, by increasing discharge volume within the Parish; 2) avoiding flooding upstream, outside the Parish, by creating a local constriction; and 3) avoiding flooding within the Parish through inappropriate development that increases the volume of discharge through the creation of more hard surfaces and faster run-off.

The junction of the permeable Lower Greensand and the impermeable Kimmeridge Clay leads to a perched spring line that can be traced through the Parish as a number of ephemeral springs, particularly after heavy rain. This perched water table has been utilised by several of the older houses in the higher parts of The Parish which have wells and for the village well and tap.

The rest of the village whilst outside the established flood area still largely drains to the north. In order to alleviate the flooding in the northern section of the Parish, there is a need to prevent the construction of hard surfaces in the remainder of the Parish that will encourage rapid run-off towards the River Thame and exacerbate the flooding problem. Land that is presently open and undeveloped provides slow downwards migration of precipitation into the ground and then percolation to the water table and via this to the River Thame.

The Parish lies entirely within the DEFRA Nitrate Vulnerable Zone. Consequently, flooding will potentially have a detrimental effect on the environment and will contribute to the problems experienced by the already fragile sewage system.

There are several ponds and some larger ornamental lakes such as those at Albury and Rycote. These two artificial lakes are both more than 150 year old although both have been enlarged and deepened more recently, thus enhancing their environmental importance.

A2.3 LAND USE

As described in the main text Fig. 2, the life of The Parish is largely agriculturally based with pastures on the lower clay areas and arable fields on the better drained alluvial areas and those underlain by sands.

Because of the major change in land use during the 18th Century, the Medieval strip farming techniques were abandoned and enclosures with hedges and straightened streams were established. Because of the limited use of machinery only the better land was ploughed and the heavier land was used for pasture. The lack of ploughing since long before 1840, with the consequent preservation of the Medieval layout means that these pastures qualify as ancient grasslands and have a special ecology with the linear wetter and drier portions, see Figure A2.3, a LiDAR image that shows the ridge and furrow terminating in the water meadows on the banks of the River Thame.



Fig. A2.3 LiDAR image of the northern part of Tiddington and Draycot

There are several areas of long-established woodland, two of which are mentioned in the Domesday listing. Parts of these and the adjoining woods are presently subject to stewardship schemes.

Whilst many hedgerows are intact and largely in good condition, there are several fields where hedgerows have degraded, leaving gaps (for example along Albury Lane) that would benefit from additional planting, adding to the increase in habitat and aiding the security of the adjacent fields.

A2.4 BIODIVERSITY AND HABITATS

A large area of The Parish is dominated by ancient habitats (see Tables 1 and 3 in main text), particularly the pastures on the lower land that preserves extensive ridge and furrow (Figure A2.3). Because of the length of time that these areas have been pasture, the soils underneath have not been disturbed, which has allowed them to develop a unique soil ecology. This in part is related to the alternating strips of drier and wetter land which supports different plant communities.

The Medieval village of Albury is preserved in the named field Church Ground.

Some of the woodland has also existed in the same place since Medieval times and again has a distinct ecology where there is a symbiosis between the trees (which do not

themselves have to be ancient) and fungi (of which we normally are only familiar with the fruiting body).

Because of the very varied habitats represented The Parish supports a wide range of wildlife much of which figures in the Section 41 definition of Protected or Notable Species (see Table 2 in main text). Many of the fauna species range over a large area and several are seasonal in their appearance.

APPENDIX 3

LOCAL GREEN SPACES AND GAPS

Contents

A3.1 INTRODUCTION

A3.2 GREEN INFRASTRUCTURE

A3.3 FOOTPATHS AND BRIDLEWAYS

A3.4 LOCAL GREEN SPACES - NATIONAL POLICY

A3.5 ASSESSMENT OF SITES

A3.6 ASSESSMENT OF GAP SITES

A3.7 PROTECTION OF SITES

A3.1 INTRODUCTION

The Local Green Space (LGS) designation was introduced into National Planning Policy as part of the Government's commitment to promoting healthy communities (NPPF, 2021, Section 8, paras 101-103). Through Local and Neighbourhood Development Plans, local communities can identify and protect green areas of particular importance to them. Once a site is designated as a Local Green Space, it is protected against new development except in 'very special circumstances'. The designation should live beyond the lifetime of the plan.

The designation of Local Green Space must be complementary to the objectives of sustainable development, and to sufficient investment in homes, jobs and other essential services. It must also be consistent with national and local Green Belt policy.

National policy states that blanket designation of all green space is not appropriate. For a Local Green Space to be eligible for designation, it must be:

- In reasonable proximity to the community which it serves
- Demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife
- Local in character and not an extensive tract of land.

Proposed designations must be supported by evidence that the green area is special to the community.

National- and County-level guidance indicates that Green Infrastructure and Open Spaces are important in the retention of connectivity of habitats which in turn aid biodiversity. Green Infrastructure is defined as "a network of multi-functional green space, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities."

The National Planning Policy Framework considers Open Spaces to be an essential part of a balanced community and states:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."

The assessments have been guided by the South & Vale Infrastructure Strategy and the methodology outlined in My Community - Locality.

Several options are available to the Parish Council in order to protect open spaces:

1. Designation as a Local Green Space
2. Agreements with landowners

3. Community Purchase - in some instances local communities have purchased important sites to ensure that they remain in community control in perpetuity.
4. Village Green status
5. Local Nature Reserve – A Local Nature Reserve (LNR) provides people with special opportunities to study or learn about nature or simply to enjoy it. Local Nature Reserves are designated by district or county councils and the Local Authority must control the LNR through ownership, lease or agreement with the owner.
6. Assets of Community Value - The Community Right to Bid gives community groups a fairer chance to prepare and bid to buy community buildings and facilities that are important to them. This could include village shops, pubs or allotments. The right covers private as well as public assets. It is important to nominate land and buildings to be part of the register of assets of community value. If something on this register is offered for sale, the community then have up to six months to prepare a bid.

A3.2 GREEN INFRASTRUCTURE

In the NPPF, Green Infrastructure includes both established green spaces and new sites. It should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently, it needs to be delivered at all spatial scales from sub-regional to local neighbourhood levels, accommodating both accessible natural green spaces within local communities and often much larger sites in the urban fringe and wider countryside.

A rural parish, such as Tiddington-with-Albury, is surrounded by Green Infrastructure. However, threads and connections running through the developed parts of villages such as streams, footpaths, gardens, trees, hedges, dry stone walls, etc are equally important. Wildlife can use these threads and connections to move through the Parish to connect with different areas of the wider surrounding open country. Some of the larger gardens in the village contain lakes or ponds which are small ecosystems in their own right. Old buildings frequently provide roosting or nesting sites for bats and birds.

It is important when considering any development, and new building development in particular, that such threads and connections are not compromised and habitats adversely affected. Preservation of the Green Infrastructure is considered all important.

A3.3 FOOTPATHS AND BRIDLEWAYS

Tiddington-with-Albury is served by a number of footpaths and a bridleway that link the various parts of the village as well as connecting to the surrounding villages.

These communication routes are strongly influenced by the natural barrier of the River Thame in the north, where the only crossing point is at Ickford Bridge, and the artificial barrier of the M40 in the south that has completely severed the direct route of both footpaths and the bridleway to Great Milton.

Footpaths also connect to Thame and Wheatley and beyond, by several indirect routes. The Parish contains two long distance paths. The Parish is crossed by the Oxfordshire Way that

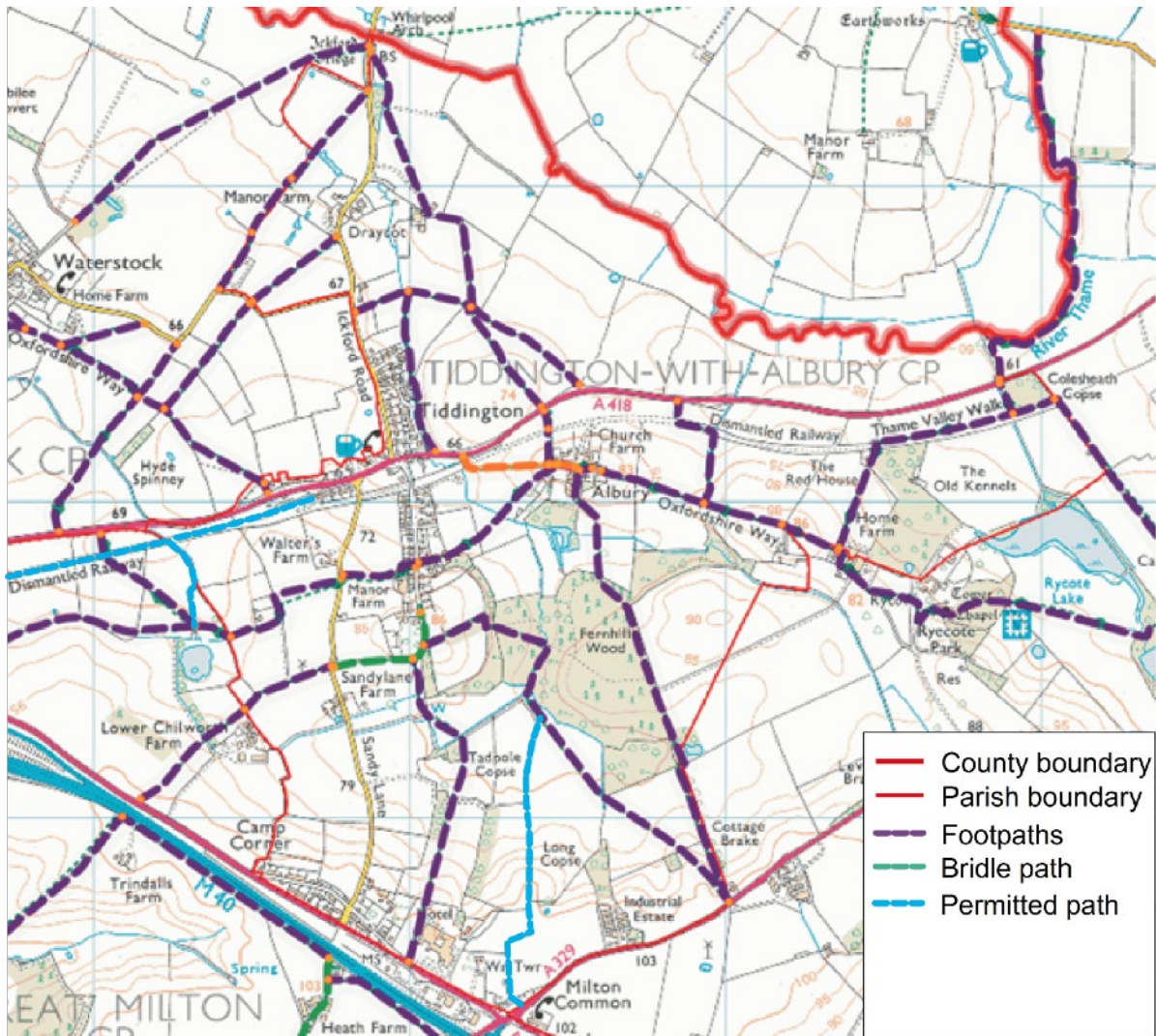
links Henley-on-Thames in the east to Bourton-on-the-Water in the west. Consequently, the preservation of the countryside through which this passes is important. This path then links to a number of subsidiary public footpaths and permitted paths.

Bridleways are poorly represented in the area and the only one, in Tiddington, is considered by riders to be an important off-road part of the network of country lanes that provide a circular route for riders in Tiddington and Waterstock.

The Parish is the start/end of the Thame Valley Walk which connects Albury with Aylesbury to the east. This acts as a route to Shabbington using one of the few crossings of River Thame in the area and again links to other public footpaths, for example to Thame.

These rights of way are shown on the definitive OCC map, Fig. A3.1.

Fig. A3.1. Footpaths and Bridleway in Tiddington-with-Albury



Because of the rural nature of the Parish the footpath network largely crosses open fields and is regularly used for a variety of recreational and social purposes. The footpath linking Albury and Draycot and crossing the named field Winnalls that was suspended in WWII has recently been re-instated. This affords views across the northern side of the village across to Brill (see Policy TwA6 and Appendix 4)

Most footpaths are in good order apart from 385/5/10 to 385/6/10 which is overgrown and in need of replacement furniture

On top of these public rights of way there are some permissive paths granted by various landowners which are also appreciated by parishioners.

A3.4 LOCAL GREEN SPACES - NATIONAL POLICY

NPPF 101 states:

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of

sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and should be capable of enduring beyond the end period of the plan. For designation of Local Green Space the NPPF requires a space to be:

- not with an extant planning permission within which the Local Green Space could not be accommodated
- not allocated for development in the relevant Neighbourhood Plan or the Local Plan, unless it can be shown that the Local Plan housing allocation is not strategic and can be re-located somewhere else in the neighbourhood plan area; or alternatively that the Local Green Space could be incorporated within the site as part of the allocated development

NPPF102 further states that the Local Green Space designation should only be used where the green space is:

- in reasonably close proximity to the community it serves
- demonstrably special to a local community and hold a particular local significance, for example, because of its:
 - beauty
 - historic significance,
 - recreational value (including as a playing field),
 - tranquility
 - richness of its wildlife

and where the green area concerned is local in character and is not an extensive tract of land.

The portion of The Parish outside the Oxford Green Belt was defined as a Designated Rural Area in 1997, is dominated by its agricultural use and comprises a mix of open fields and woodland. Within it are several open spaces that the Parish Council considers contribute to the community, as listed and justified below. Some of these are also identified as Community Facilities (see Policy TwA8).


The location of these is indicated on the following map.


All of the proposed Local Green Spaces are in close proximity to the settlements. They are regularly used by the residents and visitors and their retention is considered to be essential to the maintenance of the rural aspect of The Parish, to preserve the separation between parts of it and to preserve the special ecology of these pasture soils. Additionally, there are archaeological aspects represented by the ridge and furrow and the line of the Roman road.

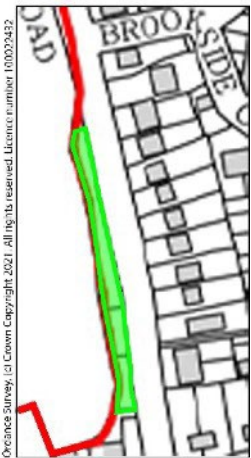
Table A3. 1 Assessment matrix

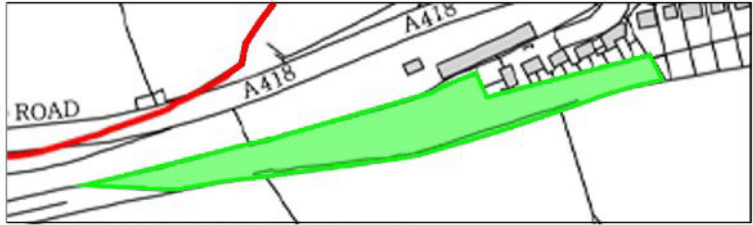
Proposed Site		Recreational value	Tranquillity	Beauty	Environmental	Historic value
LGS 1	Recreation Ground	✓				
LGS 2	Tiddington Cricket Club	✓		✓		✓
LGS 3	St Helen's Churchyard		✓	✓	✓	✓


A3.5 ASSESSMENT OF SITES


Site name / number	Tiddington-with-Albury Recreation Ground LGS1
Location	SP 649051; between Albury View and Sandy Lane
Landowner	Parish Council
Description	Recreation field and attached children's play area opening off the Village Hall and car park – 0.586 Ha
Planning constraints / Designation	None
Map	 <p style="text-align: center;"><small>Ordnance Survey. © Crown Copyright 2021. All rights reserved. Licence number 100022432</small></p> <p style="text-align: center;">Tiddington-with-Albury Recreation Ground</p>
Assessments against NPP LGS criteria	
1. In close proximity to the community	Yes, confined to area of Village Hall in centre of Tiddington
2. Demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value tranquillity or richness of its flora and fauna	Yes, regularly used as a social recreational amenity, for village fetes, car boot sales, training for village tug-of-war event, running around by children using the equipment set up and by people walking small dogs or playing with them.
3. Local in character and not an extensive tract of land	Yes
Next steps	
Landowner consultation	Consultation complete
Landowner support/objection	Supported
Recommendation	Recommended for designation

Site name / number	Tiddington Cricket Club Site LGS2
Location	SP 65150505; off Albury View
Landowner	St Luke's Hospital for the Clergy
Description	Long-established recreation field and practice area dedicated to cricket which is a local facility that additionally caters for the wider community – 1.26 Ha
Planning constraints / Designation	Open Countryside
Map	 <p style="text-align: center;">Tiddington Cricket Club</p>
Assessments against NPP LGS criteria	
1. In close proximity to the community	Yes, centre of Tiddington
2. Demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value tranquillity or richness of its flora and fauna	Yes, facilities extensively used, apart from match days. The pavilion serves as a social amenity throughout the year catering for those in the village. The bar facilities are open on a limited basis throughout the year. The training facilities are offered to young, aspiring cricketers on a twice weekly basis throughout the playing season thus providing opportunities for those from a wider area.
3. Local in character and not an extensive tract of land	Yes, long-established and cared for cricket ground that is a fenced off, private field between the centre of Tiddington and Albury.
Next steps	
Landowner consultation	Consultation complete
Landowner support/objection	No response received
Recommendation	Recommended for designation

Site name / number	Ickford Road allotments
Location	SP 64950515; on Ickford Road, Tiddington
Landowner	5 plots various owners
Description	Sliver of land between road and Parish boundary that has been used as allotments for many years by residents. – 0.204 Ha
Planning constraints / Designation	Open Countryside
Map	 <p style="text-align: center;">Ickford Road Allotments</p>
Assessments against NPP LGS criteria	
1. In close proximity to the community	Yes, centre of Tiddington
2. Demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value tranquillity or richness of its flora and fauna	Presently, this area is the only area in Tiddington available to parishioners for private cultivation. The plots are either owned or rented.
3. Local in character and not an extensive tract of land	Yes
Next steps	
Landowner consultation	Consultation complete
Landowner support/ objection	All owners objected
Recommendation	The Parish Council considers that the site does not currently meet all of the NPP LGS criteria and is therefore no longer proposed for

	LGS designation.
Site name / number	The railway line
Location	SP 658050- 671053; traverses The Parish through Tiddington
Landowner	OCC
Description	An important wooded wildlife corridor through The Parish – 1.32 Ha
Planning constraints / Designation	Green Belt and TPOs
Map	 <p>Ordnance Survey, (c) Crown Copyright 2021. All rights reserved. Licence number 100022642</p> <p>The Railway Line</p>
Assessments against NPP LGS criteria	
1. In close proximity to the community	Yes, passes through The Parish
2. Demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value tranquillity or richness of its flora and fauna	This section constitutes part of a permissive footpath. This has become a wooded area that preserves the former railway heritage of Tiddington which leads into open countryside.
3. Local in character and not an extensive tract of land	Yes
Next steps	
Landowner consultation	Consultation complete
Landowner support/ objection	Objection
Recommendation	As the site lies within the Green Belt, the Parish Council does not consider that any additional benefit would be gained by a LGS designation and is therefore no longer proposed for LGS designation.

Site name / number	St. Helen's Churchyard, Site LGS3
Location	SP 65450510; Albury
Landowner	Church of England
Description	Churchyard of St. Helen's Church that provides a place of contemplation and views over The Parish – 0.389 Ha
Planning constraints / Designation	Curtilage of Grade II listed Church
Map	 <p style="text-align: center;">St Helen's Churchyard</p>
Assessments against NPP LGS criteria	
1. In close proximity to the community	Yes, only burial ground in The Parish
2. Demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value tranquillity or richness of its flora and fauna	Yes, this represents the burial ground attached to the church and contains the graves of many ancestors of residents. Set in open country it is specifically used as a place of quiet reflection
3. Local in character and not an extensive tract of land	Yes
Next steps	
Landowner consultation	Consultation complete
Landowner support/ objection	The landowner notified the Parish Council of its future plans which would require the provision of appropriate facilities in the churchyard. The Parish Council advised that the LGS designation would not prevent proposals of this nature coming forward as per NPPF §149 b) on exceptions to Green Belt policy.
Recommendation	Recommended for designation

Site name / number	Belfry Field
Location	SP 650036; off Public Footpath
Landowner	Double-Tree by Hilton Belfry Hotel
Description	Open grass area with Public Footpath – 1.16 Ha
Planning constraints / Designation	Open Countryside
Map	
Assessments against NPP LGS criteria	
1. In close proximity to the community	Yes, edge of Milton Common
2. Demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value tranquillity or richness of its flora and fauna	Open land bordering Public footpath and used by local people for exercise and recreation together with exercising dogs.
3. Local in character and not an extensive tract of land	Yes
Next steps	
Landowner consultation	Consultation complete
Landowner support/ objection	Objection
Recommendation	The Parish Council considers that the site does not currently meet all of the NPP LGS criteria and is therefore no longer proposed for LGS designation.

A3.6 ASSESSMENT OF GAP SITE

A further option is available to the Parish Council in order to protect open spaces:

Site name / number	Church Ground
Location	SP 653051; off Albury Lane, Albury
Landowner	Mr R. Ilbery
Description	Pasture – 2.62 Ha
Planning constraints / Designation	Open Countryside
Map	

LiDAR imagery showing the field containing the site of the Medieval village of Albury



The land contains the Oxfordshire Way, a Long Distance Path following the historically named footpath Church Way. Contains the projected course of a Roman road together with Medieval ridge and furrow and most of the site of the Medieval village of Albury as shown on LiDAR imagery. Also has the former course of Tiddington Brook prior to enclosure.

APPENDIX 4

TIDDINGTON-WITH-ALBURY PROTECTION OF KEY VIEWS

Contents

A4.1 INTRODUCTION

A4.2 PROTECTION OF KEY VIEWS

A4.3 KEY VIEWS

A4.1 INTRODUCTION

The views described in this section are considered by the residents as being of importance to them and help define the rural aspect of The Parish. Some are also of significance as they include views from the long-distance paths and consequently display the landscape to visitors to The Parish.

A4.2 PROTECTION OF KEY VIEWS


The purpose of this section is to identify important views and where possible, in accordance with national and local policies, protect them. We have a statutory duty to consult with other surrounding parishes since such views extend beyond the Parish of Tiddington and Albury. Cooperation will be needed with adjacent parishes. Equally neighbouring parishes might wish to protect views into ours.

Being constructed on the side of a low hill, The Parish has various views over open countryside to the Vale of Aylesbury to the north. Milton Common on top of the hill and the southern side of The Parish have views to the Chiltern Hills to the south and east. Certain views from public vantage points, both those looking away and those looking towards The Parish and its iconic landmarks, are very important to the community. Tiddington and Milton Common are both largely linear villages with the houses mainly adjacent to open fields, whilst Draycot and Albury are surrounded by fields. This open aspect of the village is considered desirable to retain by the residents. Conservation of such views is an important element for preserving the character of the village and the surrounding landscape. Any development which might obstruct such views, or which would lead to a detrimental impact on the views should not be permitted. Identification of important views will help to conserve the Parish's tranquil nature, and sense of tradition and place.

Definition of "View": Sight of a landscape that can be seen from a particular place. Each of the important views is identified by: a photograph; the direction in which the photo was taken; the elevation: and the grid reference of the viewing position.

A4.3 KEY VIEWS

The views are illustrated in the following table and shown on the Policies Maps.

Image	Grid reference and description
	V1 Grid Reference: SP 6534 0545 Elevation: 72 metres. Footpath through the field Winnals, looking north over a flooded River Thames valley which marks the boundary between Oxfordshire and Buckinghamshire, towards Brill.

	<p>V2 Grid Reference: SP 64387 05671</p> <p>Elevation: 67 metres.</p> <p>Waterstock Lane looking north towards Ickford. The viewer can follow a footpath along the eastern flank of the fields down to the ancient bridge over the River Thames which marks the boundary between Oxfordshire and Buckinghamshire.</p>
	<p>V3a and b Grid Reference: SP 65424 05109</p> <p>Elevation: 78 metres</p> <p>Looking south west from the Oxfordshire Way towards Tiddington.</p> <p>Across the ancient field we have a view of the cricket ground and pavilion, an important focal point for life in The Parish.</p>
	<p>V4 Grid Reference: 66060 04953</p> <p>Elevation: 85 metres.</p> <p>Oxfordshire Way looking north towards Brill.</p> <p>Although the busy A418 runs west to east across the landscape, it is completely hidden from view. There are also a number of completely invisible small businesses which have managed to merge with nature.</p>



V5 Grid Reference: 65557 05076

Elevation: 81 metres.

Looking south towards Fernhill Wood from St Helen's churchyard. The view links two places of reflection and tranquility. The footpath to the wood is easily accessible via a gate to the east of the churchyard.



V6 Grid Reference: SP 65605 04775

Elevation: 78 metres

Looking northwest from a footpath across meadow and parkland towards Albury Rectory.



V7 Grid Reference: 65998 03725

Elevation: 101 metres.

Rycote Lane, Milton Common looking north towards Fernhill Wood. Although there is a busy road behind the viewer, this panorama again reflects the peaceful nature of The Parish. Just a few paces along the footpath in the field and you are immersed in nature.



V8 Grid reference: 64068 04841.
Elevation: 70 metres.

Looking east along the old disused railway line. The Parish had a train service until the middle of the 1960s.



V9 Grid reference: 65009 04491.
Elevation: 83 metres.

Looking south west from behind Hilltop Cottage across and towards a local organic farm, highlighting the residents' close contact with and respect for nature.



V10 Grid Reference: 65062 05447.
Elevation: 65 metres.

Looking north east from behind Brookside Close across farmland. The Parish has a network of footpaths leading as far as neighbouring villages.



V11 Grid reference: 65736 04506.
Elevation: 94 metres.
View looking south along a path running along the east flank of Fernhill Wood.



V12 Grid reference: 64771 04639.
Elevation: 86 metres.
From Sandy Lane looking north east over the houses of Albury View Tiddington, underlining the highly rural nature of The Parish.



V13 Grid reference: 65839 04289.
Elevation: 84 metres.
View from Milton Common, looking out to the north east from the south east corner of Fernhill Wood. Plentiful farmland extends throughout The Parish.



V14 Grid reference: 65062 04548.
Elevation: 84 metres.
From the top of Albury view
looking east over Fernhill Wood.

APPENDIX 5

A5.1 Local Facilities

The following places within The Parish have been identified as Community Facilities, Policy TwA8, or are important Commercial, Business or Service Uses TwA9, as they serve various parts of the community as well as those in the hinterland of The Parish and visitors to it.

Tiddington

- i The Fox and Goat public house, which is also a Grade II listed building.



The Fox and Goat. Has an attractive beer garden and is now a pub with a restaurant and accommodation. Parking is available both in front of and behind the building. It acts as an important social place running pub teams that compete in local leagues.

- ii. Tiddington-with-Albury Village Hall and the associated recreational facilities, see also Policy TwA3 Local Green Spaces.



Village Hall. Here there is a kitchen and licensed bar, together with a large car park, making it a meeting place that is available for hire. This facility supports the activities of the Women's Institute and local providers such as a fitness club. It is attached to the recreation ground, seen in the background.



Children's Play Area. Attached to the playing field (behind). The playing field is also used for the village fete, car boot sales, and training for the annual tug of war against Ickford.

iii. Tiddington Cricket Club, see also Policy TwA3 Local Green Spaces



Tiddington Cricket Club. This strong, thriving club, has a licensed bar and kitchen and provides the village with a focal point in summer. There are teams for adults, and boys and girls of all ages.

The pavilion is used for some village activities.

Albury

iv. St. Helen's Church, which is also a listed building, see also Policy TwA3 Local Green Spaces



St Helen's Church. A much-loved local landmark. Many folk buried in the churchyard still have family in The Parish. The weekly service attracts a small congregation of mainly retired people. The numbers rise significantly for celebrations at Christmas, Easter and Harvest.

Milton Common

v. DoubleTree By Hilton Oxford Belfry.



Double Tree By Hilton Oxford Belfry. Here, at Milton Common, parishioners have access to fitness facilities and personal trainers, a heated pool and spa with 8 treatment rooms. The dining room has an outdoor terrace.

APPENDIX 6

A6.1 A418 TRAFFIC DATA

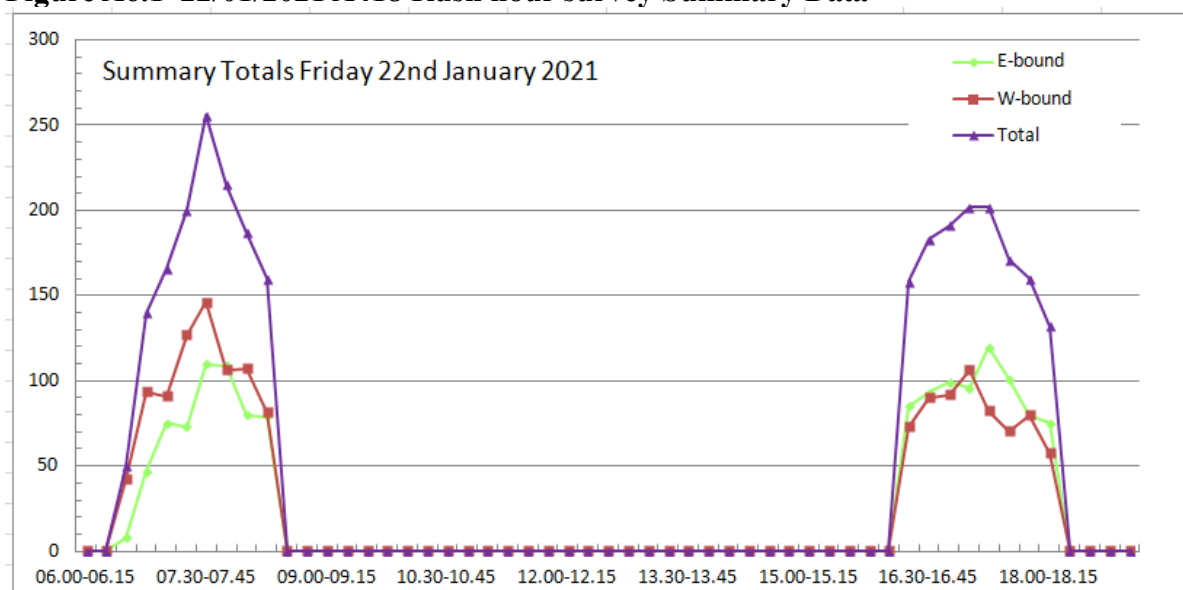
A number of test counts were carried out commencing with two Sunday lunch-time counts to help establish the protocols. These counts, both in lockdown, showed that approximately 400 vehicles an hour passed through the village.

A rush hour count was undertaken over the morning rush hour (06.30 to 08.30) and the evening rush hour (16.15-18.15), during the installation of the Puffin Crossing simply because the temporary traffic control meant that a count could be more easily managed by one person. It was clear that under normal conditions two people would be needed - one to count east-bound and one for west-bound traffic.

It is possible that some vehicles may have bypassed the road, choosing to use the A40 through Milton Common and then the A329 from Thame.

The data for the two time periods monitored on the 22nd January 2021 are presented graphically in Figures A6.1 and A6.2.

Figure A6.1 22/01/2021 A418 Rush hour survey Summary Data



Summary Totals Friday 22nd January 2021

Whilst motorbikes were counted, they were not included in the totals, bicyclists did not figure.

The total number of vehicles counted through the village in the two time periods was 2773, split approximately 50:50 with 1330 east and 1443 westbound. This equates to an averaged through-flow of 692 vehicles per hour for the total duration of the count.

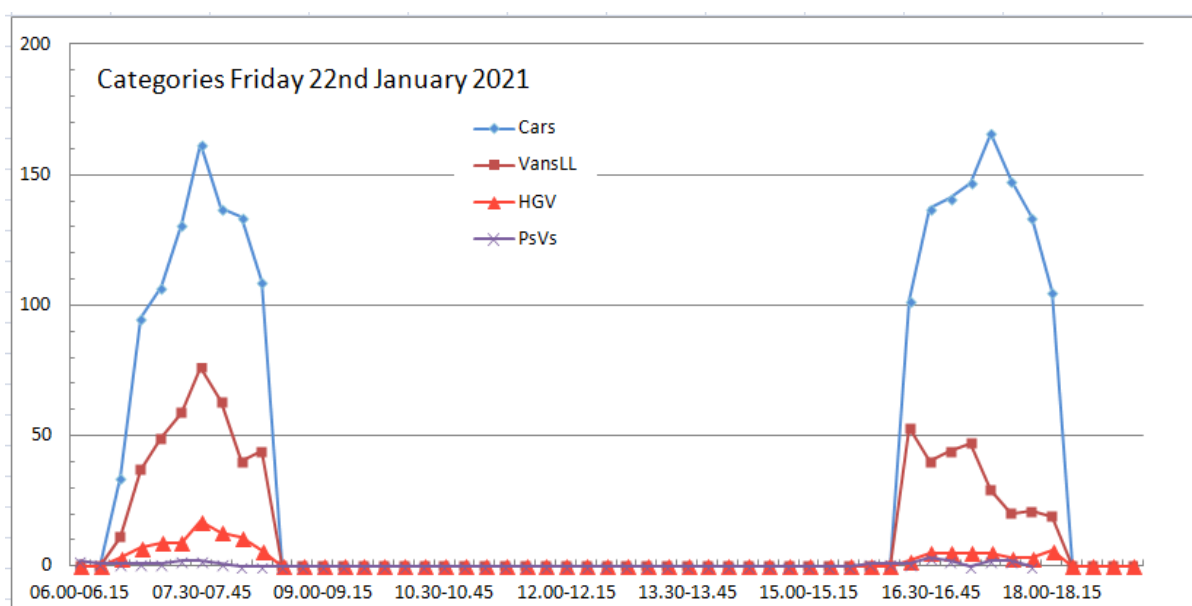
The two rush hours seem to be slightly different in their traffic flow, with fewer vehicles travelling in the evening. The morning is much more concentrated, as might be expected, with people needing to arrive at work at a specified time, giving a peak flow of ~1,000 vehicles an hour. The evening is spread out with fewer vehicles over a longer period, with a

peak flow of 800 vehicles.

There appears to be no difference between the timing of the rush hours going east and west, they both occur at the same time. In the morning there are slightly more vehicles going west than east, and in the evening they are similar.

The totals of cars going East and West did not match with 359 east and 550 west. However, vans and light lorries did match, as shown in Fig. A6.2. It is unknown why there should be an imbalance with cars as one might expect a car to travel both ways. A possibility is that the early part of the Friday exodus was missed, suggesting that the survey should have started earlier in the afternoon, a possible explanation of the anomaly noted above.

Figure A6.2 22/01/2021 Categories of Vehicles



Categories Friday 22nd January 2021

There were 75 HGVs through the village in the survey and there appear to be more HGV movements in the morning than the evening. Given the fact that these vehicles often like to move when fewer vehicles are on the road it may be that further data over the evening and at weekends is required.

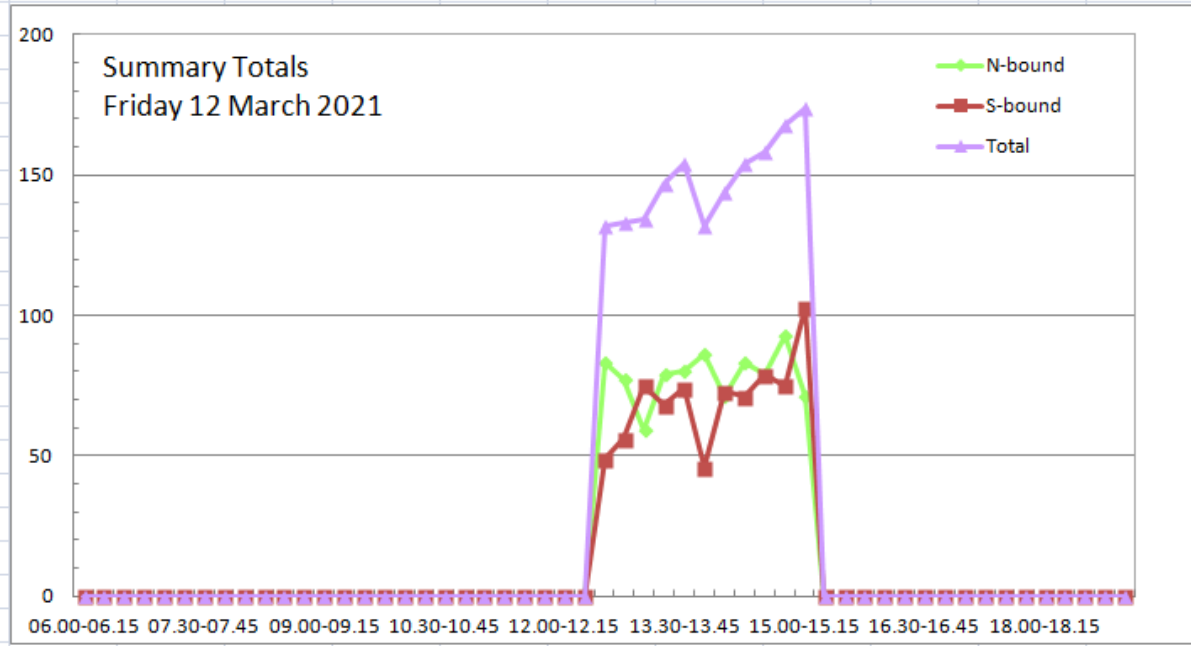
These data have been reinforced by a survey carried out by Oxfordshire County Council (OCC) between Sandy Lane and Ickford Road in June 2020, the same point as the data above were accumulated. These showed a 3-day morning peak average flow of 1428 vehicles towards Thame and 1153 towards Oxford. The afternoon peak average flow was 1071 towards Thame and 1429 towards Oxford. These corroborate well with The Parish-collected data. In addition, a further survey has been carried out by OCC in late October 2021.

A6.2 A329 TRAFFIC DATA

Little Milton Parish lies on the southern extension of the A329 and they recorded approximately 9000 vehicles a working day passing through the village. Consequently, a test count was carried out on the section of the A329 that runs through Milton Common to

establish protocols. The data for the time period monitored on the 12th March 2021 are presented graphically in Figures A6.3 and A6.4.

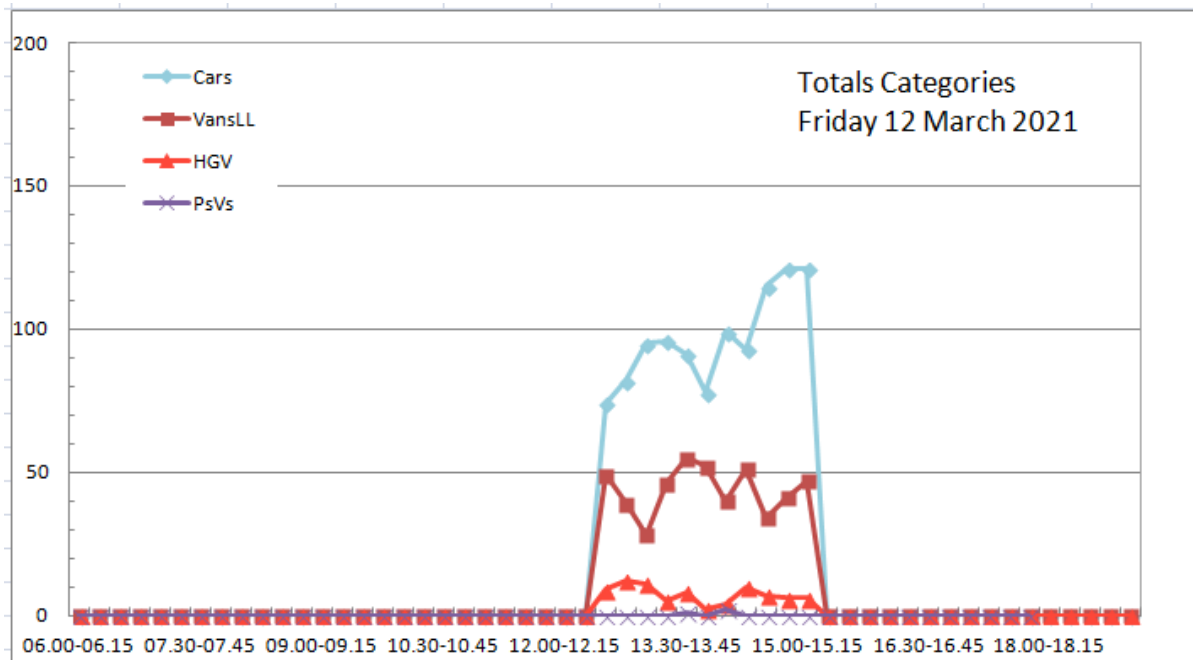
Figure A6.3 12/03/2021 A329 mid-day to afternoon survey Summary Data



Summary Totals
Friday 12 March 2021

It is evident that, at the time of stopping the test, the traffic was building towards the rush hour.

Figure A6.4 12/03/2021 A329 Categories of Vehicles



Totals Categories Friday 12 March 2021

There were 75 HGVs through the village in the survey and there appear to be more HGV movements in the morning than the evening. Given the fact that these vehicles often like to move when few vehicles are on the road it may be that further data over the evening and at weekends is required.

APPENDIX 7

BUILT ENVIRONMENT AND LOCAL HERITAGE ASSETS

A7.1 Archaeology

A7.2 Buildings of note

A7.1 ARCHAEOLOGY

Iron Age

There are Iron Age remains at Camp Corner on the boundary with Great Milton CP. These amount to field boundaries and ditches and are reported in Gray (1973).

Roman and immediately post-Roman

There are Roman-British remains at Camp Corner Gray (1973), some within The Parish, but no substantial building has yet been discovered. The coin scatter covers the late third century, a period from *c.* AD 265-300.

The occurrence of domestic pottery recovered from foundations excavations associated with the recent construction of a house at Albury and worn potsherds from Knolly's Ground (a field on the west side of Tiddington) point to some wider domestic activity.

The course of the Roman road is suggested to cross from Lower Chilworth Farm to follow School Lane and Church Path up to Albury and then down to an old ford on the River Thames.

Within the local archaeological environment, it could be argued that as there was an active road passing through The Parish, connecting important Roman towns, the potential for the sites of buildings must therefore remain. Locally there is a gap between the identified Romano-British remains at Islip and Great Haseley.

Medieval

The site of the Medieval village of Albury was believed to have been in the field named Church Grounds (Gap site A3.8, the field c in Fig. 3 in the main text and Policies Map Inset 1). This has been verified by the spectacular features delineated by the LiDAR imagery (see Fig. A2.3. The various hummocks, not related to the ridge and furrow, contained within some form of ovoid enclosure can be seen in Appendix A3.8. This feature is cut through by the field boundary that separates Church Ground from the land at Albury Grange.

The water meadows and pastures along the River Thames and some pastures elsewhere in the Parish preserve extensive ridge and furrow as shown in Figure A2.3 in Appendix 2.

Ickford Bridge was first mentioned in 1237 and has been maintained and rebuilt during the 17th Century. The use of this Scheduled Ancient Monument by HGVs was officially identified as being a potentially damaging operation (PDO) in the Ickford Neighbourhood Plan (2019).

The Parish has recorded that Oxfordshire County Council were informed of the damage in November 2018 and, due to no action being taken, Historic England was informed in December 2018 and again in May 2020 following further damage. None of these approaches were able to get Ickford Bridge the protection afforded by either the Scheduled Monument under the 1979 Act or the Listed building legislation.

Due to HGVs being unable to negotiate the subtle curve in the causewayed approach to the bridge on the Tiddington side there is clear evidence that damage is being caused to both parapets. As an illustration, the damage caused to the western parapet of the bridge is shown in Figure A7.1.



Fig. A7.1 Cumulative collision damage caused to Ickford Bridge, 12/08/2020

Fig. A2.2 in Appendix 2 shows areas that were historically water meadow, those fields immediately abutting the River Thames but without ridge and furrow, that are today still subject to annual flooding.

Post-Medieval

The bridge was defended during the Civil War, with earthworks still visible on the Ickford side. There is no information regarding any equivalent structures on the Tiddington side. Presumably, these are broadly contemporary with the skirmishes that took place in the vicinity, most notably the destruction of Boarstall, Buckinghamshire in June 1645. Ickford Bridge was rebuilt by 1685 when a dated county boundary stone was inserted into the eastern parapet.

The nineteenth century industrial archaeology of The Parish is represented by the course of the disused railway line that ran from Oxford via Cowley and Wheatley to Thame and then to join the main line at Princes Risborough. Sections of this are used by residents and are either public footpaths or permissive paths.

A7.2 Buildings of note

The following buildings, in addition to the Historic England Grade II Listed buildings, are considered to have some form of historical or architectural merit and contribute to the local heritage of Tiddington-with-Albury. The list is compiled from references to historical maps and from external inspection.

Bridleway 15

Hill Top Cottage. A group of three workers cottages now amalgamated into one property and sympathetically extended in the 20th century. Rubblestone and brick construction with

dormer windows in a roof of clay tile. Thought to be 17th century and appears on the Oxon Tiddington tithe map of 1838.

Albury View

Briela. A worker's cottage built as an addition to the west end of The White House. Built partly of rubblestone and brick with a clay tile roof. Appears on the Oxon Tiddington tithe map of 1838.

School Lane

The Old School House. Previously the local school, instituted in 1870. Rubblestone and brick construction. Roof of clay tile. Appears on the County map of 1888.

Sandy Lane

Walter's Farm. Farmhouse. Probably seventeenth century, partly of rubblestone and brick with a clay tile roof. Appears on the Oxon Tiddington tithe map of 1838.

Old London Road/A 40

The Three Pigeons. Old coaching inn located on the London Road. Rubblestone and brick construction, modernised, with roof of clay tile. Appears on the 1841 tithe map for Milton Common.

References

Gray, M. 1973. A Romano-British site at Camp Corner, Milton Common. *Oxoniensia* XXXVIII, 6-22.

Response 6: ID ANON-MT75-C6KF-Q

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-14 17:42:33

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

B c

Job title (if relevant):

██████████

Organisation (if relevant):

Secretary of OTA, the past students' association of LWS

Organisation representing (if relevant):

Na

Address line 1:

█

Address line 2:

██████████

Address line 3:

Postal town:

██████████

Post code:

██████████

Telephone number:

██████████

Email:

████████████████████

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I was delighted to see the section regarding housing for older people - i have been investigating downsizing. There are several comments to make about this, which i think might be helpful - the comments are about details within the plan, and not large scale. Firstly, it may be impossible to move, if the general election on July 4th brings in the labour government, as they are seeming to lean towards a capital gains tax on a primary home - this would make the cost of downsizing prohibitive. Secondly, there are details on new build homes that i have visited which make moving senseless. I refer specifically to the flats built on the former Daf area. The stairs up to the flat are very steep, and dangerous to me even now - yet a lift is banned from being added. A small point - the garage area has no electricity point for charging an electric vehicle. Additionally, i think many important energy conserving items are absent from the new build, e.g. high insulation and solar panels - which should be present in a new home. (These are now present in my 1979 home). Thirdly my younger son lives with me. He is not the only young person i know to run a small business in Thame and live with a relative (rental of a room for a single person is almost unavailable in the town). I cannot move unless he is able to buy into the new housing project for Thame young people - which has been held up many times for various reasons.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

This is not relevant, as my comments are about minutiae - they are important to make a system work, in terms of moving people of my age into a smaller dwelling, but are unlikely to impact in writing about overall large scale matters.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

████

Other, please specify:

Response 7: ID ANON-MT75-C6KR-3

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-21 11:57:13

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Rebecca Bone

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Thame desperately needs a large supermarket - preferably an Aldi or Lidl - for affordable and good quality groceries - this should be on the outskirts with good parking.

Consideration of parking within Thame is needed - more house and less parking is not sensible - I know the idea is for people to walk/cycle - and many do when they can, but it is naive to think that all will, and to not acknowledge that there are some trips that do require a car - such as for heavy loads. And of course, not all are able to walk/cycle. Providing more facilities within housing areas may help - the current plan risks Thame being a mass of house packed in with a tiny centre of shops - it needs more balancing. It needs more GP capacity and pharmacies. It needs better public transport - which is reliable, covers all of Thame and connects with useful places (the train station for one, with joined up timetables).

The buidling up of the land at Oxford Road is hugely detrimental to the local nature and of course risks pushing flooding downstream. I recognise the desire to keep the buidling wihtin the ring road, but it just crams in homes inside it and loses our breathing space. Once the ring road is filled in, I am sure we will be told that more houses are needed outside that, by which point we've lost the lovely nature pockets inside Thame. It would be better to develop outside the ring road and keep some space inside.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Because this impacts all of us and it is only right that we have the opportunity to influence this rather than have it imposed on us. I think the lack of engagement previously reflects a feeling of no point giving our views as they won;t be listened to,

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 8: ID ANON-MT75-C6KY-A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-30 16:56:57

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Trevor Foulkes

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I found the Thame neighbourhood plan to be an excellent document with well reasoned arguments and requirements. However I think there are two areas where further clarity would be beneficial:

1. The Cattle market

Although the plan discusses the development of the Cattle Market to support town centre activity, it does not discuss the current benefits of having a Cattle Market in Thame and the consequences to the farming community of closing or relocating it. If it is to be relocated then this should be discussed in the plan.

2. Connection to the National Rail Network

The plan does not discuss the importance of the a suitable public transport connection from Thame to Haddenham & Thame Parkway Station. The current bus service does not provide a robust connection (and with Arriva's recent announcements may get worse). The need for such a link should be included in the plan and potentially could be linked in with the proposed Park and Ride scheme so that residents and locals have a public transport link to and from the station that they can rely upon.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

[REDACTED]

Response 9: ID ANON-MT75-C6K1-2

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-04 14:15:03

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

Gill Comley

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

i note that keeping existing open spaces is regarded as important.

plans to develop a youth club at the southern road end of the recreation ground will reduce the open space at the rec.

would the development of community facilities at the cattle mkt site not be a better place for a future youth club? ie will not reduce green space at existing rec..

also parking can be incorporated at cattle mkt site,rather than using even more of southern rd rec for additional parking.

thank you.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

chance to keep updated

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Response 10: ID ANON-MT75-C6KZ-B

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-04 14:52:35

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Sheila Pearson

Job title (if relevant):

[REDACTED]

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

My concern is the agricultural land at Thame Meadows.

We are being encouraged on a macro level to eat less meat, and more plants, and the thought of yet another tranche of fertile land disappearing fills me with horror for the health of my grandchildren and their children.

Mental health is an ever growing dilemma, and convening with nature is commonly believed to help redress the balance. The bird life we are lucky enough to have on this patch include goldfinch, skylarks, and linnets, as well as our more common birds. We hear much about newts and bats, but little attention seems to be given to birds, which give a lot of us much joy.

Most of us understand the need for more housing, but there are other sights which would not affect the wildlife and crops so dramatically.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

████

Other, please specify:

Response 11: ID ANON-MT75-C639-J

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-14 19:56:06

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Madeleine Judd

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

As a homeowner facing this field, further development is a huge cause for concern.

We object to the development of these houses on the following grounds:-

1) Traffic/Safety

The proposed development will significantly increase traffic in the area. What is currently a quiet cul de sac with minimal traffic at the bottom of the development will become a through road leading to the new houses causing noise, disruption, traffic, and danger to the many children living and often playing outside on Offa Place. There is already an issue with extra cars being parked on this narrow road and further development will only exacerbate this. The influx of vehicles will also exacerbate congestion on the A418/Oxford Road contributing to air/noise pollution and adversely affecting the quality of life for the current residents.

2) Amenities

This development cannot withstand further expansion. Thame as a town is already under immense pressure and is struggling to support families in a multitude of ways. Schools, doctors and dentists are oversubscribed. The addition of new residents will strain these services further, leading to longer waiting times and reduced accessibility for essential services. Without substantial investments in local infrastructure, the community cannot support the additional burden that this development will impose.

3) Area of natural beauty/archaeological/historical interest

Thame is an area of natural beauty and on this development there is already not enough green space. The original developers did not follow through with

their plans to leave adequate natural space for children to play and there is only a meagre park in the middle of the social housing for use which is not sufficient. This reader will of course be aware of the archeological interest surrounding this site. Any construction on this site risks disturbing valuable historical artefacts. Ignoring this aspect could lead to the irreversible loss of important historical information and heritage value.

4) Flooding

As the reader is no doubt aware, this proposed site is an area known for its natural flooding. Although the new proposed plan does not span the breath of the field; further building of houses will further exacerbate this area and put pressure on the existing houses, fields and surrounding areas which will undoubtedly cause more flooding in the future. The alteration of natural watercourses and increased surface runoff due to construction can exacerbate flooding leading to potential property damage.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

This proposal presents numerous concerns that must be addressed. I urge the planning committee to reconsider this proposal and explore alternative sites or solutions that might mitigate these issues. The wellbeing of our community and the preservation of our heritage should be paramount in any development decision.

If further development is unavoidable, it should take place at the top of the site only, next to the existing allotments, with a new T junction entrance for the new inhabitants to access the site. This will keep the existing network of roads from coming under extra pressure and will help the flow of traffic.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

The reasons are obvious as outlined in my objections. There was a strong presence from local residents at the meeting of the SODC to air our concerns.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 12: ID ANON-MT75-C63X-H

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-18 13:58:00

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

■

Name:

■

Job title (if relevant):

Committee Member

Organisation (if relevant):

East Thame Residents Association

Organisation representing (if relevant):

Address line 1:

■

Address line 2:

Address line 3:

Postal town:

■

Post code:

■

Telephone number:

■

Email:

■

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We would like to comment on a number of policies contained in the latest version of the Neighbourhood Plan.

Policy GDHI Housing Allocations.

We STRONGLY AGREE with this policy.

In particular the allocation of housing on the Oxford Road site which was strongly supported by Thame residents in previous consultations.

Policy GDH2 Housing type, tenure and mix.

We STRONGLY DISAGREE with this policy.

We are concerned that it appears that 35% of new housing developments will be 4/5- bedroom homes under policy GDH2. Recent research has shown that Thame families require availability of 1 to 3-bedroom homes in order to remain in the town. 4 or 5-bedroom homes will simply attract more people to move into the town from outside.

Policy GDE1 Land at Rycote Lane.

We STRONGLY AGREE with this policy.

ETRA supports the building of employment space on the Rycote Lane site given the site is not adjacent to residential areas and is closer to the M40 and A418, so we are pleased to see that this site has been selected.

However, we are concerned that the size of the proposed site is well in excess of what is required by the Local Plan (3.5 Ha) and that external (developer)

demand is given greater weight than the needs of Thame, given;

- There is no unemployment in Thame with the number of jobs in Thame already exceeding the working age population significantly. The AECOM report commissioned by TTC confirms Thame has a working age population of 7,410 people, significantly less than the total number of jobs in Thame which totals 9,250. Inward commuter flows already exceed outward commuter flows by 1,928 trips daily.

- The majority of businesses in Thame rely on a large proportion of their staff commuting into Thame. One company interviewed as part of the AECOM report responded that 80% of its staff commute in for the likes of Aylesbury, Banbury, Bicester, Leighton Buzzard, Milton Keynes, Oxford and Didcot.

- The AECOM report has not provided any specific evidence that businesses in the town require new space or premises. TNP(2) should only allow development above the 3.5 Ha specified in the SODC Local Plan if a specific Thame business needs additional space and are ready to invest in new premises or have concrete plans to relocate.

- The justification for additional employment space in TNP(2) seems largely based on the misguided perception that Thame has lost employment space over the 2011-22 timeframe. In fact, Thame has only lost office space over this time but given there is no demand or appetite for developers or employers to invest in office space, there is no need to replace this lost space.

- In the 2011-2022 timeframe, Thame has seen vast expansion of B2 and B8 employment space which are predominantly large industrial/warehousing units (Windles, Groves, Christmas Lane Business Park and new Rycote M40).

- The AECOM report estimates an allocation of 80% warehousing and 20% industrial for the new employment space which is difficult to understand given Thame's employment profile which is dominated by professional, scientific and the technical sectors. Neither is it aligned with Oxfordshire's aspirations for hi-tech growth.

Conclusion: Excessive industrial/warehouse development in Thame will therefore only drive further inward commuting, HGV movements, more congestion and potentially greater car parking issues. In consequence, residents will be adversely impacted by greater congestion, noise and loss of green space but will not experience any benefit from excessive and misdirected development.

Policy GDR1 Cattle Market

We AGREE with this policy.

These proposals represent a more measured approach than those originally suggested by Thame Town Council.

Policy GATCP1 Town Centre Parking

We AGREE with this policy.

Once again, following our response to earlier consultations, TTC has taken a more measured approach.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Response 13: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-19 10:30

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Property Town Planner

Organisation (if relevant):

Thames Water

Organisation representing (if relevant):

Address line 1:

1st Floor West, Clearwater Court

Address line 2:

Address line 3:

Postal town:

Reading

Post code:

RG1 8DB

Telephone number:

██████████

Email:

██████████@thameswater.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

█

██████████████████

Property Town Planner

██████████

██████████@thameswater.co.uk

1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:



E: [REDACTED]@thamewater.co.uk
M: +44 (0) 7747 647031

Issued via email:
planning.policy@southandvale.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

19 July 2024

South Oxfordshire District – Thame Neighbourhood Plan (TNP2) Submission Version April 2024

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Water Supply and Wastewater/Sewerage Infrastructure – Policy Omission

As previously set out, Thames Water consider that there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy to support section 11.1. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations

The neighbourhood plan should assess the impact of any new development proposals within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187. Thame Sewage Treatment Works is located just to the north of Thame.

Where new development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission (may depend on size of sewage works). The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station.

Paragraph 174 of the NPPF, February 2021, sets out that: “Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land

instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...”

Paragraph 185 goes on to state: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”

The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “Plan-making may need to consider:whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..”

The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”

Policy CPQ5 (e) & Supporting Paragraphs 5.31-5.32: Sustainable Design and Construction - Water Efficiency

We support the reference to sustainable water use and the ‘Fittings Approach’ in particular as it is in line with our previous response.

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition

should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Policy NEF1: Flood Risk and Sustainable Drainage

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: "***It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.***"

Development Sites

The information contained within the Neighbourhood Plan will be of significant value to Thames Water as we prepare for the provision of future wastewater and water supply infrastructure.

The attached table provides Thames Water's site specific comments from desktop assessments on water supply and sewerage/wastewater network and wastewater treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements [Please note there are 2 sites where it's not clear what the numbers for the site are and/or what the breakdown of the development is and therefore we've not been able to provide comments].

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,

[REDACTED]

Thames Water Property Town Planner

Site ID	Site Name	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water	Water Response	Waste Response	Internal Comments
77246	GDE1 - Land at Rycote Lane	0	0	0	0	0	0			Unable to assess clean and wastewater impact as no property numbers have been provided.
75951	GDH1a - Land south of Wenman Road	64152	0.74	60	21000	0.73	60	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	
75137	GDH1b - Diagnostics Reagents, Wenman Road, Thame, Buckinghamshire, OX9 3NY	26730	0.31	25	8750	0.3	25	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
66177	GDH1c Land West of Windmill Road, Thame, OX9 2DT	32076	0.37	30	10500	0.36	30	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
75138	GDH1d Land at Oxford Road, Thame, Oxfordshire	106920	1.24	100	35000	1.22	100	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	
37299	GDH1e - The Elms 32 Upper High Street THAME OX9 2DN	37422	0.43	35	12250	0.43	35	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
75139	GDR1: Cattle Market site	19800	0.23	19	3000	0.1	9			Please provide the breakdown of residential properties to allow clean and wastewater capacity to be assessed.

Response 14: ID ANON-MT75-C63H-1

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-19 17:03:39

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

David Reed

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED],

Address line 2:

Address line 3:

Postal town:

Thame,

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

So that the Councils can hear the views of the citizens and react to them, not like the Oxfordshire County Council who ignore the views of their citizens.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Response 15: ID ANON-MT75-C634-D

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-20 21:45:51

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Ian Erridge

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Thame Healthcare provision is inadequate for the size of the town. Additional housing will compound this issue without the current GP practice being moved into a larger building. The government will divert NHS funding to more deprived areas, so local healthcare services will not get additional funding required to support the additional increase in the local population brought about by additional housing.

Although the birth rate may have decreased recently, additional housing will increase the number of children living in the catchment area of the local schools. Therefore there will be a requirement to increase school provision in the town.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

I feel the plan has not correctly represented the healthcare and schooling requirements of Thame correctly. Hospitals are trying to discharge patients from hospitals early and requesting GP practices undertake diagnostic tests, which would previously performed in a hospital. So the workload on primary care has increased drastically. This is not reflected in the plan.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Response 16: ID ANON-MT75-C63A-T

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-22 08:23:18

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

DanBevan

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

From the last council meeting the council voted for more information but generally agreed to oppose the planning permission for the extension to Thame Meadows. It would now appear that in the new TNP you are proposing 100 extra homes. Can you tell me what was changed?

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

As stated. What bee material does TTC have to add to go for 100 new homes at Thame Meadows from the last planning meeting

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

These are radical changes to the current TNP. This needs to go to a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

████████████████████

Other, please specify:

Response 17: ID ANON-MT75-C63C-V

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-22 17:21:47

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Ben Brewer

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Whilst the Thame Neighbourhood plan puts forward a number of welcome changes for the town, I OBJECT to the proposals for additional housing, both due to the number of houses suggested and also explicitly the use of site F on the land north of Oxford Road. I have outlined my key reasons below for your further consideration.

Flood Risk

The proposed site F forms part of the flood plain and flood meadows for the River Thame and Cuttle Brook, which are regularly flooded each year. My personal observations from living in Thame for the last 5 years are that this flooding has worsened over that time and given the current rate of climate change, can only be expected to further worsen. During the period of heavy rainfall in Dec 2023, the fields experienced very heavy flooding, which in places exceeded the flood levels outlined in the planning document SM5116-SL-1000. This has been recorded in photos and drone footage, which have been shared on social media and the local newspaper, and can be made available upon request.

I therefore question the accuracy of the flood models used, even with the additional 31% buffer to account for climate change. These models seriously underestimate the potential flood impact, even before accounting for the additional housing and associated concrete and tarmac required for the roads and paths. It is my understanding that the modelling used by the Environment Agency are not up to date and not reflective of the present levels of flooding experienced in the area.

I also have concerns that even if the flood modelling was updated that any developer would propose a solution to offset the problem, which again wouldn't fully account for the impact of the new development. There are many national examples of new developments built on or near flood plains with preventative measures in place, that then continue to flood or have caused problems for areas downstream. I am greatly concerned that the local impact has not been fully understood and modelled, and further, that the downstream impact has equally not been considered and could potentially be

significant to other local villages such as Shabbington and Ickford, which also suffer with extreme flooding already.

Partially linked to the flooding, I have concerns about sewage risk. Again referring to the period of wet weather in Dec 2023, this led to Thames Water pumping raw sewage into the local rivers for over 50 hours, as reported on their website. This is not the first instance of this and combined with the flood waters in the area, could lead to homes not only being flooded but flooded with water containing raw sewage.

A final concern is regarding building insurance for new and existing properties. Given the proximity and potential increased risk of flooding, this will lead to more expensive and in extreme cases, an inability to obtain home insurance. Again, impacting new and existing residents of Thame.

Access to new development

This proposal will result in at least a 75% increase in traffic into and around the existing roads of Thame Meadows, which is potentially dangerous and unsustainable. It should be noted that there have already been a number of accidents that have occurred at the junction of Roman Way and Oxford Road and the increase in traffic will also bring an increased risk of further accidents at this junction.

Given the existing parking of cars on Weavers Branch, Roman Way and Saxon Square, I am concerned about access of emergency and police vehicles to both of the proposed new sites, which can only be through those routes. There is the additional point that traffic to the new north eastern site (phase 3) will increase vehicular traffic passing on 2 sides of the children's playground in Saxon Square. This must be highly undesirable as a highway/access issue. The turning of vehicles into, and parking of vehicles on, Roman Way at its junction with Oxford Road, by parents dropping off at peak time in the morning and collecting in the afternoon, only exacerbates the unsuitability of Roman Way as the sole access into these proposed 2 sites.

No actual traffic survey has been carried out at Roman Way/Oxford Road since Thame Meadows was completed in 2018. The basis of the Traffic Assessment presented in support of this application, is the original Traffic Assessment presented in 2014 (see para. 4.3 of Glanville's report dated 5/12/23). Remarkably, looking at Glanville's 28/11/14 report, the traffic surveys were carried out in 2011! Even giving Glanville's Report credence, its model estimated that traffic movements at that junction would be 928 per day (see para. 5.8 of the 28/11/14 report). With the new development, this will increase by a theoretical 455 movements generated by the 100 new dwellings. The total site would generate an estimated $928 + 702 = 1,630$ traffic movements a day in to, or out of, Roman Way. This is a huge number and will likely cause unsuitable tailbacks and delays at the junction.

Infrastructure & Services

Thame is unsuitable for further growth without substantial new public facilities. There is no availability for new patients for NHS dentistry in Thame according to the website <https://dentalchoices.org/nhs-dentist-nearme/?address=Thame%2C+Oxfordshire%2C+England>.

There are only 2 GP practices in Thame and both are hard-pressed with residents struggling to get appointments, often with multiple week waits. Their capacity to take on new patients has not been demonstrated.

Capacity of primary school and senior school places has not been demonstrated.

Thames Water have responded to an earlier planning application from Bloor Homes for the eastern site P22/S2418/FUL, that - Thames Water have identified that some capacity exists within the water network to serve 49 dwellings but beyond that upgrades to the water network will be required. This inability to cope was again demonstrated recently when Thames Water suffered a major outage impacting the whole town and has happened on multiple occasions in Thame Meadows and the Western side of Thame.

Car parking in Thame is already stretched to cope. The additional car parking for cars from new dwellings (some doubtless having more than one car) cannot be catered for at present. The situation will only get worse with the loss of 126 car spaces at the Cattle Market Car Park when the market moves and the site is redeveloped.

Heritage & Archaeology

Previous archaeological finds have identified prehistoric settlements to the west of the current Thame Meadows development. Surface digs have been conducted on the east development side but these were not deep digs or extensive, and were also apparently conducted without Thame Council permission and no findings have been shared. Nothing to date has been checked on the north development site, which is a larger area and highly likely to contain finds of heritage value given the closer proximity to the known archaeological site. Extensive digs are needed to ascertain this before any development could be carried out.

Bloor were originally granted permission to build additional housing to the West of the current site but due to the archaeological finds, were restricted. I have spoken to the local town planner who informed me that the area is not protected in law from being built on but would require additional costs from the developer. However, it seems that Bloor are unwilling to bear the additional costs and have stated it would make it the development unaffordable for them, but they seem happy to seek alternative options at the expense of the town and local residents.

Transport concerns

The consultancy report produced by Glanville states that the development is within the 2km range of walking distance to local amenities. The entrance to this site would be in Causeway Close, and there would need to be added to that distance the walking distance to the particular dwelling within the proposed site. Walking distances from the entrance to the site, according to Google Maps are:-

- to Waitrose store - 22 mins 1 mile (1.6 kms)
- to GP Surgeries in East street - 31 mins 1.4 miles (2.25 kms)
- to Lord Williams's Lower School - 39 mins 1.7 miles (2.74 kms)

It must be considered unrealistic to think that new occupants would walk to these facilities. The proposed site is simply too remote from these essential facilities, and new occupants would seek to drive to them.

The report also states that one access point is sufficient for 400 dwellings. The models used do not supply the margin of error for typical models, as stated in previous section. Therefore, without this known data accurate decisions can't be made due to a lack of knowledge of the error the models have in their prediction. Moreover, the observations used as a basis for the prediction is based on only one day of observations mid-week (Weds). Finally, the conclusion of the development not impacting highway safety is unproven by the report.

At present, I fail to see the positives of site F other than providing a space for a housing developer to profit. I fully support the addition of new housing to the town and making it affordable for buyers to get onto the housing market but that shouldn't be at the expense of the town itself and existing residents. The town is in need of facilities to support the current population before growing and growth should be considerate to what makes Thame a great place to live. Sandwiching a site between a main road and a flood plain simply because it is next to an existing site is not the best answer and I highly recommend that this is looked at again and the considerations of the public properly taken into account.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

The main changes I would like to see are:

- Increases in services and facilities for the existing population with allowance to account for any future growth in population
- Review all land across Thame to identify the most optimal sites for housing, not just those next to previous reserve areas - this should also take full account of resident needs and the impact of development

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 18: ID ANON-MT75-C63Q-A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-22 17:45:39

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

George Rumsey

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I am strongly opposed to this additional development by Bloor homes. I appreciate the need for new homes elsewhere in Thame but this development is wrong on so many levels; increase flood risk, removal of much needed green space, ecological disaster, erosion of community space, traffic increase in already bottle necked area.

The area is clearly a flood plain. The proposed housing plan is meant to be safe from a 100 year flooding risk event plus a 30% buffer, however the recent flooding suggests the water is already reaching the new housing plan. This throws significant concerns over the accuracy of the model used, not to mention the potential impact of increased flooding elsewhere along the river.

The current Thame Neighbourhood plan specifically states this area should not be developed and left as open space. Indeed it is my understanding that a legal agreement between the developer and Thame District Council was put in place so that the land is designated 'accessible open space'.

Thames Water are already capacity constrained, resorting to pumping raw sewerage into the local river during the recent flooding. The system is clearly not able to support a further 100+ homes.

A legal agreement exists between the developer of the current Thame Meadows estate and the SODC to keep this land as accessible green space and to prevent it from being built on!

Please don t allow this development and simply extend the nature reserve.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

The sheer number of people opposed to this Thame Meadows extension/ development warrants a proper public hearing, so the people can make themselves heard properly.

The development on this site does not make any sense and will impact the lives of hundreds of existing residents for the worse. There are better sites elsewhere in Thame that have extra space for much needed additional infrastructure to support all the extra housing.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 19: ID ANON-MT75-C63R-B

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-22 19:20:39

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Jeannette Matelot

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I was very involved in the initial Neighbourhoods Plan and was proud of the team and the residents who committed themselves to working together to produce a good plan for Thame. The impetus was the SODC Core strategy which was allocating about 800 homes on land at Oxford Road. I am astonished that after the success of the original plan in dispersing the allocations around the town we are now back to over development on Oxford Road. I can understand and agree that the land to the west of the existing development (Site F in old money) could be developed as per the core strategy but not the land to the east

Two reasons. This is too close to the flood plain and I know you have received lots of photographs of the fairly recent flooding. This land was allocated as green open space in our original plan. I therefore strongly object to this allocation and would like to see the land to the east taken out.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Because I want to hear the arguments put forward by the two councils.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

[REDACTED]

Response 20: ID ANON-MT75-C63K-4

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-23 08:29:07

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Stuart Russell

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Thame

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

It is good to see commentary around transport and links to Haddenham.

However, I think we are missing an opportunity to include some guidance / policy about providing an integrated transport plan.

Currently the buses from Thame to Haddenham and Thame parkway do not sync properly with trains in either direction. The buses tend to be large and are already on pre-defined routes.

A study into how / when people to the station could provide options going forward. This could include electric shuttle buses that are charged in the town's new EV points. Additionally, an £8 taxi from Thame to the station is outrageous!

We are also not far from the Lewknor stops that provide good bus access to London and the airports. Again, there is no proper links to the existing public transport networks. Using electric vehicles (as above) could be one option but a wider study would provide more options.

A dedicated cycle path/ walkway between Thame and Haddenham (to the station) is hinted at but not really addressed. It could be multi use with electric golf buggies providing shuttles to Thame alongside the walkers and cyclists.

In short, we need to look wider and connect the dots to what we already have and what could be to make Thame the best it can be!

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

See above. Consideration of an integrated transport plan - join the dots!

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

████████████████████

Other, please specify:

Response 21: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-23 11:30

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Strategic Planner

Organisation (if relevant):

Oxfordshire County Council

Organisation representing (if relevant):

Address line 1:

County Hall, New Road

Address line 2:

Address line 3:

Postal town:

Oxford

Post code:

OX1 1ND

Telephone number:

[REDACTED]

Email:

[REDACTED]@oxfordshire.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear South Oxfordshire Planning Policy,

Please find attached a response from Oxfordshire County Council to the Thame Neighbourhood Plan Review Consultation. I'd be grateful if you could confirm receipt.

Kind regards

[REDACTED]

[REDACTED]

Strategic Planner

Strategic Planning & Infrastructure | Environment & Place

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING
CONSULTATION:**

District: South Oxfordshire

Consultation: Thame Neighbourhood Plan 2020-2041 (Submission Version)

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council welcomes the opportunity to comment on the Thame Neighbourhood Plan Review and supports the Town Council's ambition to prepare an updated Neighbourhood Plan.

Officer's Name: [REDACTED]

Officer's Title: Strategic Planner

Date: 23 July 2024

ANNEX 1
OFFICER ADVICE

District: South Oxfordshire

Consultation: Thame Neighbourhood Plan 2020-2041 (Submission Version)

Team: Strategic Planning

Date: 18/07/24

Strategic Comments

The County Council has provided comments on the drafting of the Thame Neighbourhood Plan in August 2021, January 2022 and most recently in June 2023 in response to the Regulation 14 Consultation on the Draft Plan. We welcome the changes made in response to our comments.

There are additional comments made by Transport Development Management and Property teams regarding this Neighbourhood Plan Submission version.

Regarding Policy GDR1 – Cattle Market Site, we are seeking text be deleted in order that the site be delivered in line with the County Council's parking standards¹, in accordance with paragraphs 111 and 112 of the National Planning Policy Framework. The site is ideally located to promote sustainable travel and should minimise the need to travel by private vehicle. Deletion is also sought in Appendix 2 in regards Bin Storage to also bring it into conformity with the County Council's Parking Standards.

Further amendment is required to Figure 26 so that it aligns with Policy SF02 – Existing Open Spaces, and so that it is in conformity with paragraph 103 of the National Planning Policy Framework and Policy CF4 of the adopted South Oxfordshire District Council Local Plan 2035.

Finally, please note typographical corrections needed as below.

- Policy GAAT1 – Active Travel
 - '3. New streets provided with areas of growth and development must conform with the transport user hierarchy as set out in the OCC Local Transport and Connectivity Plan and seek to avoid conflicts between different users.'
- Paragraph 5.41 'as set out in Parking Standards for New Developments (2011).'

For completeness, the following teams were consulted and had no comments to make

- Minerals and Waste Policy
- Lead Local Flood Authority
- Archaeology

¹ [Parking standards for new developments \(oxfordshire.gov.uk\)](https://www.oxfordshire.gov.uk/parking-standards-for-new-developments)

District: South Oxfordshire

Consultation: Thame Neighbourhood Plan (TNP2) 2020 – 2041 (Submission Document)

Team: Transport Development Management

Officer's Name: [REDACTED]

Officer's Title: Assistant Transport Development Management Officer

Date: 17/07/2024

Transport Development Management Comments

Chapter 1

No comments.

Chapter 2

No comments.

Chapter 3

The proposed 20-minute neighbourhood approach is welcomed and aligns with Policy 13 in the Local Transport and Connectivity Plan but can only be implemented with appropriate development site allocations.

All pedestrian and cycle routes will be required to be designed in accordance with Local Transport Note (LTN) 1/20. Rural routes must consider this design standard and seek to provide suitable designs that accord with Policies 1, 2, 3b & c and 4b in the LTCP and with the County's public rights of way requirements in accordance with Policy 5 of the LTCP and the County Council's adopted Rights of Way Management Plan 2015-2025.

Chapter 4

Housing & Employment allocations:

Several housing sites are proposed within the neighbourhood plan. Each site when it comes forward (and any speculative ones) will be assessed on its merits. For each planning submission, these must be accompanied with either a Transport Assessment or Transport Statement, subject to the quantum of development. The County's Decide and Provide approach must be implemented within this supporting documentation.

Access to the frequent public transport corridors (both existing and new) must be considered as part of the proposed site allocations to ensure that Policy 18 within the LTCP is implemented (identified in Chapter 8 of document, policy GAP1).

On-site parking provision must be provided in accordance with the County Council's adopted parking standards (Parking Standards for New Developments) for both residential and employment sites.

The design and master planning for these sites must consider all national and local design requirements, including LTN 1/20, Manual for Streets (MfS) and OCC's Residential Guide (picked up in Chapter 8 of document). All new vehicle access arrangements must be designed in accordance with appropriate design safety standards, such as MfS and Design Manual for Roads and Bridges (DMRB).

Retail and other use allocations:

The plan proposes the redevelopment of the Cattle Market Site. Policy GDR1 (points 2 & 3) state the requirements for the redevelopment to not result in any loss of parking spaces, unless there is suitable justification to show that there is sufficient offsite parking provision available. Existing parking spaces on the site would not count towards the requirement for any new parking that is generated. The site, as existing, provides a large amount of vehicle parking.

The site is in a central location, with large availability and opportunities for public transport. The site is within proximity to local amenities and residential areas. It is therefore encouraged that the plan should use the redevelopment of Cattle Market as an opportunity to promote sustainable travel methods and mitigate the need to travel to the site via private vehicle. In line with paragraph 111 and 112 of the National Planning Policy Framework, it is not considered that there is clear and compelling justification as to why this allocation should supersede Oxfordshire County Councils parking standards.

The second sentence of point 2 and the entirety of point 3 should be removed from policy GDR1.

Chapters 5, 6, 7, 8 and 9

No comments.

Appendix 2

The bullet point '*Development that provide enclosures for bin storage should be combined with cycle storage and provide green roofs*' is contrary to Oxfordshire County Council parking standards. Bin storage must be designed away from cycle and car parking facilities. This bullet point should be removed.

Appendix 1 & 3

No comments.

District: South Oxfordshire

Consultation: Thame Neighbourhood Plan (TNP2) 2020 – 2041 (Submission Document)

Team: Place, Planning and Co-ordination South

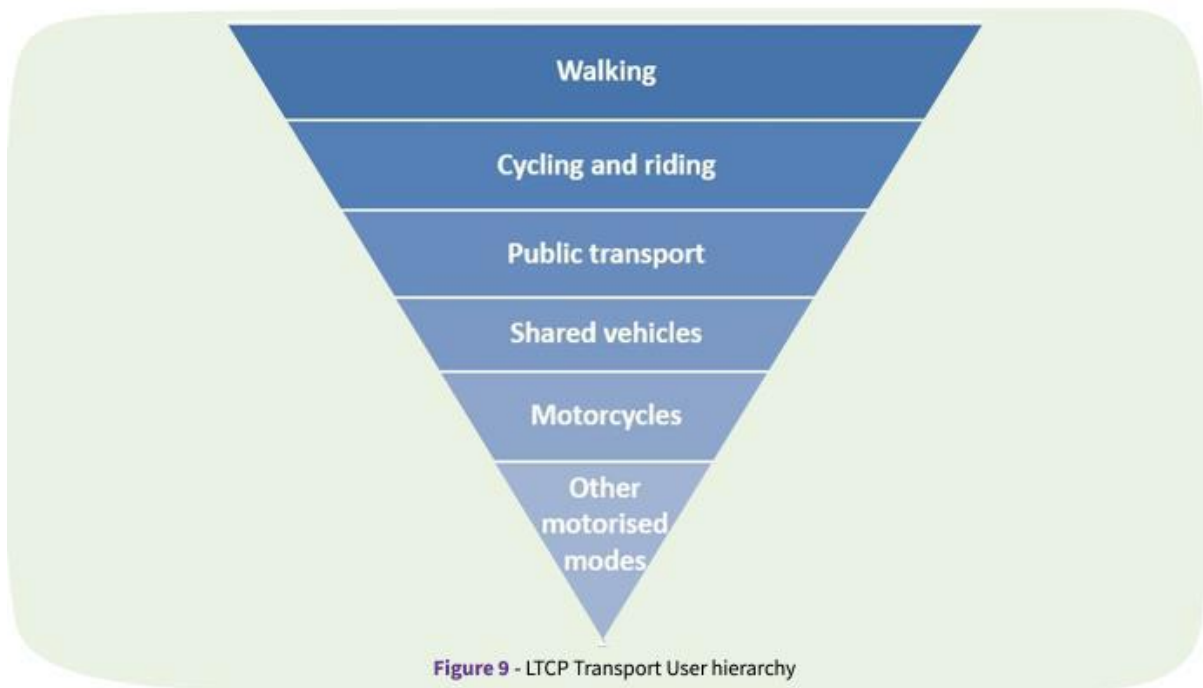
Officer's Name: [REDACTED]

Officer's Title: Transport Planner

Date: 11/07/2024

Place Planning (Transport) Comments

With regards to policy CPQ6: Street Hierarchy, it would be useful to reference OCC's Transport User Hierarchy from the Local Transport and Connectivity Plan (LTCP) policy 1 directly. The hierarchy sets out a prioritised order in which OCC will consider different modes of transport in policy development and scheme design. The hierarchy is as shown below:



The link to OCC's LTCP webpage:

<https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp>

District: South Oxfordshire

Consultation: Thame Neighbourhood Plan (TNP2) 2020 – 2041 (Submission Document)

Team: OCC Property

Officer's Name: [REDACTED]

Officer's Title: Senior Planner

Date: 10/07/2024

Property Comments

The Oxfordshire County Council (OCC) Property Team has reviewed the Thame Neighbourhood Plan (NP) Submission Document and Consultation Statement February 2024 (Volume 3a: Report of Consultation On Development Sites and Wider Policy Ideas) and notes that the comments made on 7th August 2023 concerning the Pre-Submission Document and in regards to draft policies **GDH1b: Diagnostics Reagents**, **GDR1: Cattle Market site** and **NEC1: The Cuttle Brook corridor** have been taken into account by the NP Steering Group. OCC Property has therefore no more comments to make in response to these policies.

Policy SF02: Existing Open Spaces

OCC Property notes that the OCC land parcel marked M: Thame Football Partnership, as shown on Figure 26 of the NP continues to be proposed to be designated as an "important open space" and protected and retained in line with the relevant paragraphs of the NPPF.

OCC Property appreciates the clarification provided by the NP Steering Group on page 34 of the latest Consultation Statement, where it was highlighted that:

"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."

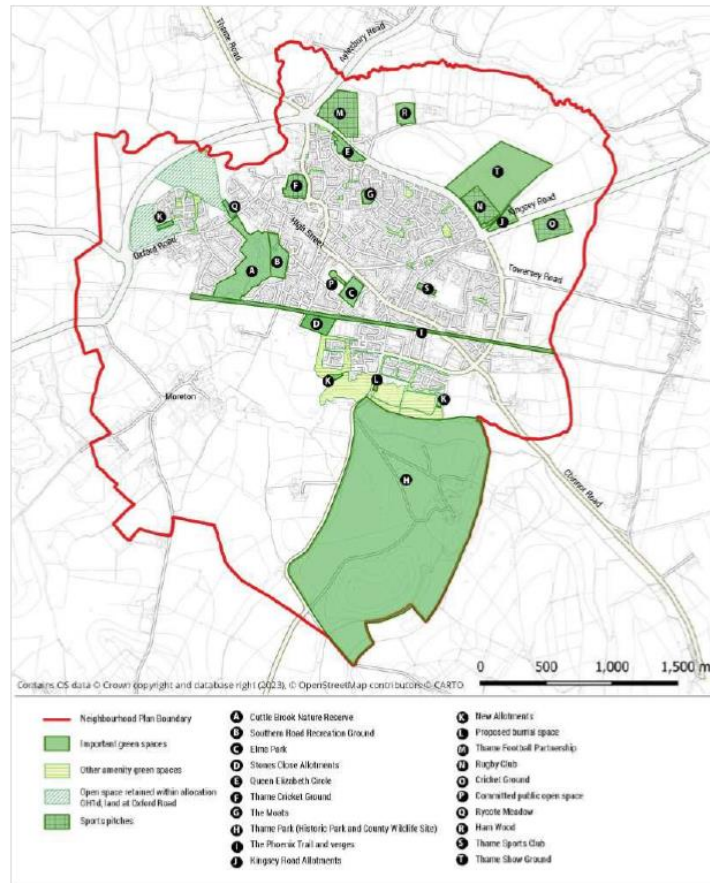


Figure 26: Plan of important open spaces in Thame to be protected and retained

Notwithstanding the above, OCC Property would like to request a minor amendment to the title of Figure 26 in order to accord with the description of draft NP policy SF02: Existing Open Spaces and ensure that this draft policy is in general conformity with paragraph 103 of the NPPF and adopted SODC Local Plan policy CF4. Therefore, it is proposed that Figure 26 should state:

“Plan of important existing open spaces in Thame to be protected and retained”

Response 22: ID ANON-MT75-C63B-U

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-23 16:49:14

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Barry Yates

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Land off Oxford Road- Thame Meadows. TNP2 looks to build a further 100 houses on this site. Whilst this is an improvement upon previous applications made by Bloor Homes, it is still over development of the site. I object to the 30 houses proposed for the eastern side. These will be built right on the edge of the flood plain on land which is currently green space & which should be preserved as was the intention with the original TNP. Furthermore they will adversely impact on the Cuttle Brook nature reserve which is home to wildlife such as foxes, deer & water fowl.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

The new plan is a major proposal which needs public involvement as it impacts on the whole population of Thame.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Response 23: ID ANON-MT75-C63Y-J

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-23 17:05:45

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Sarah tack

Job title (if relevant):

[REDACTED]

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We are no good with forms etc, so please ignore if this comment is no good. But my husband has lived in thame most of his life, I moved her from Chinnor 17 years ago when we married. Our landlord has told us he is selling our flat at christmas time,,, there is nothing around here that we can afford to rent, my husband has been on the south oxfordshire home choice since 2004,,, when we spoke to them they told us we have to be prepared to move from thame , when we look thame doesn't often come up and we're told while we're housed we can't do anything!!! So we're stuck. But what annoys us and many others, people get moved into thame from other places but we're told we've got to be prepared to move!!! We have very elderly parents and our daughter is settled in lord williams and chosing her gcse next year+ I don't drive and I don't want to leave my job of nearly 29 years!!! Any help would be applicate.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 24: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation Submitted on 2024-07-24 06:16

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Adviser Operations Delivery

Organisation (if relevant):

Natural England

Organisation representing (if relevant):

Address line 1:

County Hall

Address line 2:

Spetchley Road

Address line 3:

Postal town:

Worcester

Post code:

WR5 2NP

Telephone number:

0300 0603900

Email:

consultations@naturalengland.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

For the attention of [REDACTED]

Please find Natural England's response in relation to the above mentioned consultation attached.

Kind regards,

[REDACTED]

Adviser

Operations Delivery, Consultations Team

Natural England

County Hall

Spetchley Road

Worcester

WR5 2NP

Tel 0300 0603900

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Date: 24 July 2024
Our ref: 479808
Your ref: Thame Neighbourhood Plan 2



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

██████████
South Oxfordshire District Council

BY EMAIL ONLY

planning.policy@southandvale.gov.uk

Dear ██████████

Thame Neighbourhood Plan 2 Review - Regulation 14 Consultation

Thank you for your consultation on the above dated 13 June 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

██████████
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Response 25: ID ANON-MT75-C63M-6

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 10:53:18

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Project Manager

Organisation (if relevant):

Sustrans

Organisation representing (if relevant):

Address line 1:

2 Cathedral Square

Address line 2:

Address line 3:

Postal town:

Bristol

Post code:

BS1 5DD

Telephone number:

Email:

[REDACTED]@sustrans.org.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

On the Phoenix Trail, we are happy to see that this has been included in and has been described as the most significant asset in the town. We do work hard to maintain it, and it is a successful piece of infrastructure from 15 years ago. In order to keep it at the current level, and even to upgrade it to widen it as is mentioned, we are looking for additional funding to help achieve this. We are more than happy to look at doing this alongside the plans to improve the Phoenix Trail and to make it even better than it is now.

Overall also really positive to improve the network of active travel links within Thame, we are working with other towns and cities on how to improve local networks whether by reducing traffic or creating livable neighbourhoods and that is something we would be keen to work alongside with yourselves in the future if that is something you want to look into.

We also think it is worth looking into a connection to the train station in Haddenham, and creating a cycle route between the station and Thame. We have created feasibility studies for this in the past, with 2021 with the most recent, and this was completed for Oxfordshire County Council. This is something we hope is being continued to be worked on to be able to create a safe cycle route between the two towns as well as connecting Thame to a wider network of public transport.

General Comments on Thame area:

Hatchet Lane doesn't allow for cyclists to use their bikes and has them dismount - it would be great to be able to eventually resolve this and get the permissions to allow cyclists to continue and not dismount. It creates accessibility issues for those that cannot and allows better movement along the NCN as a whole. Would it be possible to upgrade this PROW to a bridleway to allow for access?

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 26: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 12:09

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Senior Planning Manager

Organisation (if relevant):

Beechcroft Developments Ltd

Organisation representing (if relevant):

Address line 1:

1 Church Lane

Address line 2:

Wallingford

Address line 3:

Postal town:

Post code:

OX10 0DX

Telephone number:

Email:

██████████@beechcroft.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Good afternoon,

Please find enclosed a copy of our representations to the Submission Version of the Thame Neighbourhood Plan Review (TNP2).

We trust all is in order but please let me know if you require anything further - details within the email signature below.

Kind regards,

██████████
MPlan MRTPI

Senior Planning Manager

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Beechcroft Developments Ltd
1 Church Lane Wallingford
Oxfordshire OX10 0DX

T 01491 834975
F 01491 825433
E info@beechcroft.co.uk
W beechcroft.co.uk

South Oxfordshire District Council
Planning Policy Team
Abbey House
Abbey Close
Abingdon
Oxfordshire
OX14 3JE

24th July 2024

Dear Sir / Madam

Re: Representations to Thame Neighbourhood Plan 2 (TNP2) 2020-2041 (Submission Version – April 2024)

Beechcroft Developments Ltd welcomes the opportunity to comment on the submission version of the TNP2 and wishes to make a number of representations as set out below.

Established in 1984, Beechcroft Developments Ltd is a small-medium sized housebuilder operating across the southern counties. Our focus is on large and medium-sized sites in towns and villages and we specialise in the creation of aspirational, high quality housing developments for independent people over the age of 55.

National Planning Practice Guidance (NPPG) on 'Housing for older and disabled people' (2019) highlights that the need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to around 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. The Government's objective on ensuring the specialist housing needs for older people are met and the importance to be attached to this objective is therefore clear.

Our representations are as follows:

Policy GDH1: Housing development and allocations

Policy GH1 is a general housing policy and refers to both allocated sites and proposals coming forward on unallocated or windfall sites.

Criterion 4 of the policy states '*sites should provide good access to services and facilities, being within walking distance of essential services and amenities, **having particular regard** (our emphasis) to the catchment distances in Table 2.*' This Table includes a variety of different services / facilities with different walking catchment distances.

Thame is a fairly unique market town in that, with the exception of the BP Garage along Chinnor Road which also forms an M&S Simply Food store, there are no shops, supermarkets or convenience stores located outside of the Town Centre boundary as identified on Figure 21 of the Submission Version of the TNP2.

Criterion 1. of the policy suggests a preference for utilising previously developed land within the built-up area of the settlement. However, such sites are likely to be scarce, particularly given the competitiveness of suitable brownfield sites within settlements. It is therefore inevitable that if additional sites in Thame are brought forward for development, these are likely to comprise undeveloped areas of land. Given the compact, nucleated settlement form of Thame, such sites will almost certainly be located at the peripheries of the town.

With this in mind, it is highly unlikely that new sites proposed for development (windfall sites) will be able to comply with each catchment distance specified within Table 2. Indeed, for example, unless one proposes to develop the Cuttle Brook or an existing recreational / amenity greenspace, no undeveloped site will be located within 400m of a local shop. This issue is not, however, limited to new and unidentified sites. Many (if not all) of the proposed allocated sites for development within the TNP2 are not within the walking catchment distances for each and every facility / service identified in Table 2.

As such, whilst idealistic, it is not considered realistic for development sites (including those currently identified and new forthcoming sites) to be located within the specified walking catchment distances for each service/facility referenced.

Furthermore, demonstration of 'good access to local facilities and services' should not be limited to just walking distances. Thame is one of the most sustainable settlements within the South Oxfordshire District, identified as a 'market town' and forms a tier 1 settlement within the adopted settlement hierarchy. It is served by a network of bus routes with frequent services available at various locations across the town, offering swift and easy access via public transport methods into the town centre. As such, we consider Table 2 should reference proximity to existing and new proposed public transport infrastructure which facilitates travel into the town centre where the majority of local facilities and services are situated.

We acknowledge the specific wording of criterion 4 which states '*Sites should... **having particular regard to** (our emphasis) *the catchment distances in Table 2.*' In light of our comments above, it is important that these catchment distances are not applied too rigidly in assessing proposals for development which could preclude sites otherwise considered suitable for development from being supported. We therefore suggest criterion 4 of Policy GDH1 is amended in either of the following ways:*

- The wording is amended to ensure the catchment distances are more flexibly applied in the consideration of development proposals, acknowledging that new development sites are not likely to be within the catchment walking distances of all facilities / services listed in Table 2; or
- Add a further point acknowledging that where sites are located outside of the identified catchment walking distances, support will be given to proposals which are located close to existing or new proposed public transport infrastructure such as bus stops etc; or
- Instead of providing specific walking catchment distances, the policy confirms support will be afforded to proposals '*within easy access of shops, facilities and public transport services*', utilising the same wording specified at criterion 9 of Policy GDH2, for consistency.

Summarising our comments to Policy GDH1, we consider certain aspects of this policy (in particular criterion 4) are too restrictive and, in some cases, the requirements are not realistically achievable. Amendments are therefore required to ensure the policy can be accurately and clearly applied in the consideration of development proposals.

Policy GDH2: Housing type, tenure and mix

Between 2012 and 2022 in the ward of Thame and in South Oxfordshire, the fastest growing age group was the 65+ age-group with increases of 39.6% and 23% respectively¹. This trend is projected to accelerate between 2021 and 2041 with the entirety of population growth in South Oxfordshire being attributable to growth in those aged 65+². Paragraph 4.48 on page 44 of the TNP2 states Thame's household age band 55-64 is expected to grow by 10% by 2037 whilst the 65+ age bracket is expected to grow by 61%. The importance of providing additional suitable housing opportunities in a variety of forms and tenures to cater to this growing age group is therefore clear.

There is currently a significant unmet need for all forms and tenures of specialist accommodation for older people in South Oxfordshire District. Based on current supply (as of 2024) in South Oxfordshire, there is a significant need for all market-led specialist accommodation types for older people in South Oxfordshire, especially market age exclusive/sheltered housing (current requirement of 1,228 homes)³. There is also a deficit of affordable tenure specialist housing for older people across all accommodation types.

At a settlement level, the Thame Neighbourhood Plan Housing Needs Assessment (March 2022) provides estimates for older persons' housing need over the period 2022-2037. The report estimates this need to be between 237 to 300 units over this timeframe. We note that the Plan period for the TNP2 extends beyond this period to 2041 to align with the emerging Joint South & Vale Local Plan. It is therefore likely that the need over the TNP2 Plan period is higher than that indicated within the TNP HNA (March 2022). Further to the above, it is also important to note that there will also be the need to replace obsolete units counted within the current supply figures with more appropriate specialist accommodation, which means this need could be higher still than the HNA identifies.

In light of the above conclusions, it is positive to see Policy GDH2 affords support for new proposals for specialist housing for older people in Thame. However, we consider the policy could and should go further in its support for the delivery of this type of housing, particularly given the needs identified within the HNA are additional to the residual housing requirement to be delivered through TNP2. As currently drafted within the submission version of the TNP2, there is no policy requirement or specific design criteria for any of the proposed allocated sites to deliver specialist housing suited for older people. It is therefore imperative that general housing policies within the Plan and associated requirements are unequivocal in providing support to proposals for this type of housing on unallocated sites. We therefore suggest criterion 8 of the policy is amended to refer directly to support for this type of housing on unallocated sites.

Affordable housing is the subject of criterion 2 of the policy. The final sentence of this point states *'priority is to be given to the delivery of affordable rented tenures in the early years of the Plan period.'* It is difficult to envisage how this part of the policy will be complied with. Each major development scheme being delivered will have its own Section 106 Legal Agreement which will specify the triggers for delivery of the affordable housing relative to that scheme. This controls the phasing of when affordable housing will be delivered for occupation, to a certain degree. Typically, these triggers relate to delivery of affordable homes overall and do not distinguish between specific tenure of affordable housing – i.e. separate delivery triggers for affordable rented dwellings.

Furthermore, it is not always practical or, in some extreme cases, possible, to deliver a certain type of housing before another. Site constraints may mean that development must happen in a certain sequence, making it difficult to release homes for affordable rent in advance of another housing tenure.

¹ ONS, Mid-Year Population Estimates

² ONS, 2018-based population projections

³ Assessment of supply based on a review of planning applications for older persons housing since 2014 and information obtained from the EAC database.

As it is not entirely clear how the final part of criterion 2 of Policy GDH2 is to be achieved, we recommend this part of the policy is deleted.

Criterion 3 requires all developments of 10 or more homes to provide First Homes. Policy GDH2 is a general housing policy and therefore refers to all development including proposals for specialist housing for older people. Specialist housing for older people such as retirement communities are specifically designed to accommodate the needs of the intended residents with corresponding functions, building forms and layouts. As one of the UK's leading retirement developers, in our experience these developments are typically not compatible with certain types of affordable housing such as First Homes. Such schemes are more receptive to and appropriate for discounted market sales homes as an alternative form of affordable housing. Discounted market homes fall within the wider definition of 'affordable housing' as set out within the NPPF. These types of affordable tenure homes are able to adhere to the imposed age-restricted occupancy of retirement schemes.

It is also our experience that registered social providers / landlords are reluctant to secure more conventional types of affordable housing such as affordable rent on retirement schemes or developments comprising other forms of specialist housing for older people. This is due to a variety of factors including the age-restricted occupancy and a typically greater service charge associated with these developments which makes it financially difficult for tenants of more conventional forms of affordable housing to afford. In comparison, discounted market homes are retained for sale by the developer meaning there is reduced risk of delivery and occupation.

As such, criterion 3 to Policy GDH2 should be amended so it is clear that proposals seeking to deliver specialist housing for older people are exempt from the requirement to provide First Homes. We also consider criterion 2 should be flexibly worded to enable the delivery of more appropriate tenures of affordable housing for varying forms of residential development.

Policy CPQ5: Sustainable Design and Construction

Beechcroft Developments Ltd support the general thrust of the policy which seeks to improve operational sustainability of development schemes through design and construction considerations.

Within point 1, the policy refers to developments '*targeting zero carbon emissions*' and '*being "Future Homes Standard" ready.*' We consider it more appropriate for the policy to refer only to the Future Homes Standard, omitting reference to zero carbon emissions, on the basis that this already an accepted nation-wide approach. This will ensure developers are clear at the outset exactly what is expected to be achieved on developments, avoiding having to develop different approaches in separate local authority areas, or in some cases, separate approaches for sites within different settlements within the same authority area.

Policy NEB1: Biodiversity

Whilst supportive of the policy as a whole, there is a conflict between criterion 1 and criterion 2 which confuses the interpretation of the policy requirements.

Criterion 1 of the policy states development proposals '*must secure a minimum net biodiversity of 10% on-site...*'. This conflicts with criterion 2 of the policy which goes on to confirm alternative options to on-site BNG provision. Whilst we acknowledge the first part of criterion 2 identifies a 'strong presumption for on-site provision', suggesting a clear preference for on-site BNG provision but if this is not possible then there are alternative options, the word 'must' combined with the words 'on-site' within criterion 1 denotes that on-site provision is the only option.

To make the policy clearer, we suggest deleting the words 'on-site' within criterion 1. The policy would then still be effective at requiring the delivery of a minimum 10% BNG, with the second criterion confirming the order of preference of provision.

Criterion 2 further states it is strongly recommended that *'off-site measures should be provided within one year of construction work commencing.'* Whilst we note the word 'recommended' is used, indicating this is not a mandatory requirement, we would like to highlight that it is not always possible to complete off-site BNG improvements within this timeframe. As such, our recommendation is for this part of the policy to be deleted and the timeframe for delivering any off-site BNG works remain the subject of agreement between the applicant and the local planning authority.

We trust you will consider the above representations and look forward to receiving your formal acknowledgement.



Senior Planning Manager

Response 27: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 12:31

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Senior Primary Care Estate Manager

Organisation (if relevant):

NHS, Buckinghamshire, Berkshire and Oxfordshire

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

██████████@nhs.net

Part B - Your comments

3 Please provide your comments below.

Dear Sir or Madam,

Please see the attached ICB representation.

Best regards,

██████████
Senior Primary Care Estate Manager

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:



Planning Policy Team
South Oxfordshire District Council
planning.policy@southandvale.gov.uk

Unipart House
Oxford
OX4 2PG

24 July 2024

Dear Planning Policy Team,

Thame Neighbourhood Plan (TNP2) 2020-2041 Submission Version dated April 2024 Consultation

Thanks for giving us an opportunity to make our representation at the Thame Neighbourhood Plan (TNP2) 2020-2041 Submission Version Consultation.

Introduction

Integrated Care Board is a statutory NHS organisation, which was established on 1 July 2022 by The Integrated Care Boards (Establishment) Order 2022 and has the delegated function of commissioning of primary healthcare services. ICBs now carry on all CCGs functions including the commissioning of primary healthcare services including GPs. NHS Buckinghamshire, Oxfordshire & West Berkshire Integrated Care Board (ICB) formally replaced the former Oxfordshire Clinical Commissioning Group (CCG) on 1 July 2022 and carries on all CCG functions as far as they relate to primary care and its estates. The ICB however has no dedicated funding for any primary healthcare estates development in their annual budgets.

Primary healthcare estates including GP premises are funded through reimbursement of rents and business rates by the ICB. The rent will then be assessed by the District Valuer, given that the ICB will reimburse that rent. As a primary healthcare commissioner, the ICB therefore has a responsibility to ensure that any primary healthcare provision is financially affordable and operationally viable.

Chapter 6 Services and Facilities

The ICB supports the importance of and need for healthcare in Thame. Given the complexity of the funding and delivery of primary healthcare services, The ICB considers that paragraph 6.10 should be revised to reflect the changes and a new paragraph should be added to discuss the delivery of primary healthcare services. Please see the suggested amendments:

*The SODC Infrastructure Delivery Plan does not identify a specific healthcare requirement for Thame and the funding and delivery of healthcare services and facilities is complex: NHS Commissioners (NHS England and **Integrated Care Boards (ICBs)**) place contracts with NHS providers to treat patients. The providers of NHS Services include the NHS Trust, General Practitioners, NHS dental practices, NHS community trusts, private and third sector contractors. Funding comes primarily through general taxation and National Insurance Contributions. ~~Where development might result in an increased population and additional burdens on healthcare services, funding through s106 agreements and the Community infrastructure Levy can be sought to contribute towards any necessary improvements.~~*

Primary healthcare estates are funded through reimbursement of rents and business rates by ICBs. The rent will then be assessed by the District Valuer. Therefore, ICBs

have a responsibility, as a primary healthcare commission, to ensure that any primary healthcare provision is financially affordable and operationally viable. ICBs have no dedicated funding for any primary healthcare estates development in their annual budgets. Where development might result in an increased population and additional burdens on primary healthcare services, funding through s106 agreements and the Community Infrastructure Levy can be sought to contribute towards any necessary improvements and expansions of existing healthcare facilities to accommodate any new population.

The ICB welcomes the alternative model of delivery by repurposing existing buildings, providing a range of services including primary healthcare services as suggested in Paragraph 6.11. However, the ICB considers that further information should be provided regarding the temporary arrangement. This is to ensure that this arrangement is in line with any GP's contracts.

The ICB welcomes a policy to encourage improved and new infrastructure including the provision of mixed-use facilities to meet local community needs. This is in line with the ICB Primary Care Strategy¹ which is protecting the effective use of public estate and community assets to support primary care delivery.

The ICB is content to work with Thame Parish Council, South Oxfordshire District Council, potential GP provider(s) and local stakeholders to explore the opportunity of how this alternative model can be delivered. As a primary healthcare commissioner, the ICB, however, as discussed above, has a responsibility to ensure that any primary healthcare provision is financially affordable and operationally viable.

Policy SF01: Community Facilities and Services

The ICB supports a policy related to community facilities and services. As discussed above, the ICB needs to ensure that any new primary healthcare provision, including any new provision on a temporary basis, is affordable and operationally viable. The ICB should be involved at an early stage in any pre-planning discussion with developers, Thame Parish Council, South Oxfordshire District Council, GP provider(s) and local stakeholders, given our delegated function of the commissioning of primary healthcare services.

The ICB suggests the following to be added to the supporting text to Policy SF01 to briefly set out that any primary healthcare provision should be financially and operationally viable. Being a primary healthcare commissioner, the ICB should be engaged with any new primary healthcare provision:

Proposals comprise any primary healthcare provision will only be supported if it is operationally and financially viable, the details of which should be agreed with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or other such appropriate body. Any new primary healthcare facility room sizes should comply with the Department of Health Building Note 11-01 (or any successor documents). Developers are encouraged to engage with BOB-ICB at an early stage to discuss the details of the delivery and contractual arrangement of the facility. The delivery of the facility shall be funded by developer contribution and/or the Community Infrastructure Levy and the provision, and any contractual arrangement of the facility shall be agreed and secured by a Section 106 agreement in any forthcoming planning applications.

Summary and Conclusion

¹ Primary Care Strategy | <http://yourvoicebob-icb.uk.engagementhq.com>

Thank you again for giving us an opportunity to make our representation at the Consultation. Please do not hesitate to contact me if you have any questions related to the representation.

Yours sincerely


Senior Primary Care Estate Manager

Response 28: ID ANON-MT75-C63Z-K

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 15:38:36

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Organisation (if relevant):

██████████

Organisation representing (if relevant):

██████████

Address line 1:

██████████████████

Address line 2:

██████████

Address line 3:

██████████

Postal town:

Post code:

██████████

Telephone number:

██████████████

Email:

██████████████████████████████

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I am objecting to the Oxford Road development on the grounds of practicality and overdevelopment of an existing site. The North West portion of this site is very susceptible to flooding, as evidenced last winter and the eastern portion is close to the cuttlebrook stream and also liable to flood. The changing environment means this is a potential serious problem in the near future.

Access to the North West portion is not practical or safe, past a playground on a sharp bend and down a narrow residential street round another sharp bend, all with a single access road for the whole development.

This swapping of sites is to benefit the developer but will create extreme problems for the residents for a very long time. The residents suffered years of delays in finishing this site and are now expected to endure again.

The planning meeting for the most recent applications was jam packed with concerned Thame residents from all areas of the town, knowing the folly of building here, we all thought we had some understanding but must all feel let down if this goes ahead.

The plan should be based on common sense as well as development need.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 29: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission
Consultation Submitted on 2024-07-24 17:05

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agency

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Associate

Organisation (if relevant):

David Lock Associates

Organisation representing (if relevant):

Hallam Land

Address line 1:

Bourne House

Address line 2:

50 North Thirteenth Street

Address line 3:

Postal town:

Milton Keynes

Post Code:

MK9 3BP

Telephone number:

[REDACTED]

Email:

[REDACTED]@davidlock.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam,

Thank you for the opportunity to comment on the Thame Neighbourhood Plan Review: Submission Consultation.

I am pleased to enclose the response on behalf of Hallam Land. If you have any questions on our representations or wish to have a call to discuss, please do not hesitate to contact myself or [REDACTED].

If you are able to confirm receipt of this submission, that would be really appreciated.

Kind regards

[REDACTED]

Associate

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

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Public hearing

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Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Planning Policy
South Oxfordshire District Council
Freepost SOUTHANDVALE

By email only:
[Planning.policy@southand](mailto:Planning.policy@southandvale.gov.uk) vale.gov.uk

24th July 2024

HLM027/NF/GM

Dear Sirs,

**RE: Thame Neighbourhood Plan (TNP2) Review:
Regulation 16 Consultation Response**

Representations on behalf of Hallam Land

Introduction

1 Hallam Land ('Hallam') is pleased to respond to the current Thame Neighbourhood Plan Review submission consultation.

2 Hallam is the strategic land and planning promotion arm of the Henry Boot Group of Companies. Hallam's role is to promote and develop land opportunities that meet the needs of communities, including the need for new infrastructure (education, health, environment and transport) and the company has a substantial track record in bringing forward a variety of developments, working in partnership with local communities, Local Planning Authorities, and infrastructure providers and other stakeholders such as affordable housing providers and community land trusts.

Hallam Opportunities in Thame and Availability

3 In March 2019 the Town Council issued a Call for Sites that should be considered as part of the Thame Neighbourhood Plan Review. Hallam Land submitted two sites as follows:

- Land adjacent to the Chinnor Rugby Ground and the Thame Showground – 3.5 hectares, suitable for employment and community uses – (now referenced 893.1)
- Land east of Thame, south of Chinnor Rugby Club and A4219 – 12.5 hectares – suitable for some 250 new homes, health, community, local facilities and services, green infrastructure, sustainable transport infrastructure – (now referenced 843.1)

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Central Milton Keynes
Buckinghamshire
MK9 3BP

☎ +44 (0) 1908 666276

✉ mail@davidlock.com

🌐 www.davidlock.com

- 4 The Call for Sites submission included a Vision Document for the land east of Thame (but also including the land adjacent to the rugby club). The Vision Document (attached again to these representations for convenience) set out a concept for development that was closely integrated with Thame and capable of delivering many of the communities' needs. The Vision demonstrated how development would: create a new gateway into Thame; create a positive and accessible edge with the countryside; facilitate delivery of new infrastructure in the form of affordable housing, new sustainable transport linkages within the existing form of Thame, new community facilities and services. An illustrative master plan describes the land uses that are capable of being delivered east of Thame along with considered strategies for access and movement and for green infrastructure and open space.
- 5 Hallam control land to the north west of the rugby club, which is also available for development for a mix of uses.

Thame Neighbourhood Plan Review – Due Process

- 6 Hallam understands that this formal six-week consultation, known as the submission version consultation, is the final stage of consultation as the Neighbourhood Plan has been submitted to South Oxfordshire District Council to start the examination process.
- 7 Hallam looks forward to contributing in the next stages in the examination into the Neighbourhood Plan review. In this regard Hallam considers that the Neighbourhood Plan review examination process should include a public hearing – not least in relation to the scale of need for housing, affordable housing and specialist housing in the Neighbourhood Plan Area. Hallam request that the company be invited to participate in any such hearing.

Thame Neighbourhood Plan Consultation

Basic Conditions

- 8 Schedule 4B to the Town and Country Planning Act (TCPA) 1990 requires the examiner to consider whether the draft neighbourhood development order meets the basic conditions. These conditions are set out below.
 - (a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*
 - (b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
 - (c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
 - (d) *the making of the order contributes to the achievement of sustainable development,*

- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
- (f) the making of the order does not breach, and is otherwise compatible with, [assimilated] obligations, and*
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

Consistency with National Policy and Guidance

- 9 National Planning Policy seeks to encourage the delivery of sustainable development proposals having regard to the economic social and environmental elements that collectively contribute to the definition of sustainable development.
- 10 In particular, a fundamental objective set out in national guidance is to significantly boost the supply of new homes. The minimum expectation in the first instance is that local plan making should meet local housing needs including in particular the needs of different sections of the community: *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing with care and care homes)..." (Para 63)*
- 11 It is for strategic policy making authorities (South Oxfordshire) to establish a housing requirement for their whole housing area. The NPPF further anticipates that the strategic policy should set out discrete requirements for designated neighbourhood plan areas¹. Where this is not possible then an indicative figure should be provided when requested that *"should take account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recent planning strategy of the local planning authority"*².

General Conformity with the Strategic Policies of the Development Plan

Housing Policies (GDH1 and allocations)

- 12 The strategic policies of the Development Plan are set out in the South Oxfordshire District Council's Local Plan which was adopted in December 2020.
- 13 Policy H3 of the Local Plan requires some 1518 new homes at Thame over the full plan period of 2011-2035, of which some 339 dwellings were sought between April 2020 and the end date of the plan 2035. This was and is a minimum requirement. The submission version Neighbourhood Plan looks to factor in subsequent completions and commitments (albeit not necessarily completed) and calculates that this leaves 'a

¹ NPPF, para 67

² NPPF Para 68.

minimum of 143 new homes to be accommodated in Thame over the Plan period 2021-2041' (para 2.4).

- 14 However Hallam does not consider this is an accurate presentation of need (if it is intended to be so) not least since it is based on the Local Plan policy which extends to 2035 only and does not reflect an updated housing requirement that will be set out in the new joint local plan being prepared for South Oxfordshire and the Vale of White Horse which will extend the strategic policy context to 2041. The Joint Local Plan published only in preferred options form in January 2024 is clear that the requirement of 143 dwellings is simply the residual outstanding requirement from the existing Local Plan to 2035.
- 15 Policy GDH1 of the Neighbourhood Plan does not set out a specific housing requirement for the Neighbourhood Plan area to 2041, the supporting text simply noting the outstanding requirement to 2035.
- 16 Hallam Land supports this approach in the Neighbourhood Plan in that it sets out a generic policy against which new housing proposals may be considered.
- 17 Such evidence as has been assembled in relation to the whole NP period, including the Housing Needs Assessment and Update, identifies significant evidence of need in particular for a number of specialised or other housing requirements. Moreover the NP signals the historic and continuing contribution of smaller windfall sites in terms of meeting local housing needs. One scenario tested more on the basis of capacity evaluation than need in the AECOM SEA was to assess a residual requirement of 510 dwellings.
- 18 So in relation to housing needs beyond 2035 the Joint Local Plan 2041 provides little or no clarity. The basic conditions statement does not explain its conclusion that GDH1 and the subsequent allocations identifies a sufficient supply and mix of sites" in particular for the whole of the NP period.
- 19 It is imperative therefore that the Neighbourhood Plan policy will futureproof the ability of the Neighbourhood Plan to deliver the requirements for future development to 2041 – in order to meet the basic tests.
- 20 To do so it is necessary to establish and set out need as a policy objective, which the Plan chooses not to do, or to establish a more broadly based criteria led policy against which new proposals may be considered. This, Hallam tends to believe that Policy GDH1 achieves, but will wish to secure assurances through the Examination process.
- 21 In this regard the reference in para 4.18 of the Plan is a concern wherein it indicates that "Where proposals for housing come forward these will need to be judged against the outstanding housing requirement for Thame". As noted above there is no

- outstanding requirement for Thame – certainly not beyond 2035 – on only some evidence of need.
- 22 This reference should therefore be deleted from the text preceding Policy GDH1. Insofar as any text is necessary, then it would be appropriate to adopt guidance broadly as follows: “Where proposals for housing come forward these will need to be judged against evidence of housing need, including for different sections of the community...”.
- 23 As to the detailed wording of Policy GDH1 Housing Development and Allocations, it is understood that policies GDH1 and GDH2, have merged to form GDH1 Housing development and allocations. Although broadly supportive of Policy GDH1, there are some updates that were presented in our Regulation 14 consultation response that should be given further consideration.
- 24 Hallam considers the locational criteria within Policy GDH1 to inform the appropriateness of sites for residential development to be broadly reasonable, and also those set out in Policy GDH2.
- 25 Specifically in respect to criterion (2) of GDH1 (“Proposed sites should not, individually or cumulatively, result in the coalescence of, or unacceptable impact on, the visual separation of (i) Thame and Towersey, or (ii) Thame and Moreton.”), Hallam consider that it may be helpful to recognise the potential of high quality design to mitigate potential impacts and to ensure that any proposals deliver sustainable development (in accordance with the basic conditions). To this end it is considered that GDH1(2) should be amended as follows: “Proposed sites should not, individually or cumulatively, result in the coalescence of, or unacceptable impact on, the visual separation of (i) Thame and Towersey, or (ii) Thame and Moreton. *The review of this impact should consider the potential of design and landscaping to address or mitigate such impact*”
- 26 In addition, Table 2 is also noted to be referred to within Policy GDH1. If read as a requirement, this could be challenging and in some cases unfeasible to achieve for many of the site allocations and other sites that may be required in the future to meet Thame’s housing need. South Oxfordshire District Council’s Local Plan (December 2020) does not include any required distances to local services and amenities. Instead, good access to the Town Centre is referenced within policies STRAT5: Residential Densities, H1: Delivering New Homes includes a requirement for good access to public transport and local facilities for specialist housing and H13: Specialist Housing for Older People states that “*Encouragement will be given to developments which include the delivery of specialist housing for older people in locations with good access to public transport and local facilities.*”
- 27 To reflect the position above, the text within Policy GDH1 should be reflected as set out below.

Sites should provide good access to a range of services and facilities relevant to the uses of the site, being within walking distance of essential services and amenities having particular regard to the optimal catchment distances in Table 2 and/or the access to such services or facilities by other sustainable transport modes.

28 **Extra supporting text:** *Table 2 represents an optimal series of walking distances. The accessibility of a site comprises an overall balance of actual walking distances but also the ability to access such services and facilities by other sustainable modes – including public transport.*

29 The suggested text above will ensure basic conditions (d) and (e) are met as they contribute towards achieving sustainable development and they conform with the policies within South Oxfordshire District Council's Local Plan (December 2020).

Housing type, tenure and mix (GDH2)

30 Paragraph 4.48, page 50 emphasises Thame's ageing population with age bands at 55-64 expected to grow by 10% by 2037 (above 2011 figures) and the 65+ age band is expected to grow by 61%. This rise in population of people over 55 is significant.

31 Further to this context, Policy GDH2 which echoes the wording of previous Policy GCH3, states the following,

"8. Proposals for development that meets the need of the ageing population (specialist housing) will be supported. The tenure split of specialist housing developments should comprise 60% market homes and 40% affordable homes.

9. Where specialist housing is proposed it should be located within easy access of shops, facilities and public transport services. Housing should be well integrated within the wider neighbourhood and be designed in accordance with the HAPPI principles.

10. Support will be given to proposals for new homes that are designed to be adaptable to meet the future accommodation needs of occupiers at different stages of their lives."

32 This clearly acknowledges the importance of providing sufficient specialist housing to meet future needs in Thame. Hallam is supportive of this acknowledgement but suggest the policy should go further to secure specialist housing that will meet this need, a need which is in addition to the minimum residual 143 homes to be provided by 2035.

33 Policy GDH2 should provide sufficient opportunity to meet this increasing need for specialist housing whilst ensuring any proposed development for specialist housing is appropriate and meets the needs of the remaining requirements set out in Policy GDH2 and other policies such as CPQ1, Design in Response to Local Character.

- 34 Hallam propose a slight amendment to the wording within Policy GDH2, part 8 to reflect the discussion above and to ensure that national and strategic policy objectives are consistently assessed. This is set out below.

*Proposals for development that meets the need of the ageing population will be supported. **This includes unallocated sites where there is an identified need.** The tenure split of specialist housing developments should comprise 60% market homes and 40% affordable homes.*

Employment Policies

- 35 The Neighbourhood Plan seeks to provide 'a minimum of 5.5 hectares of land for employment purposes (to provide office, manufacturing and distribution jobs) to be accommodated over the Plan period) and to address the outstanding minimum requirement for employment land at Thame- a key part of the strategy for sustainable growth at the town.
- 36 In Hallam's view, the allocation of a single employment allocation to provide the minimum of 5.5 hectares of employment land over the plan period 2021-2041 does not appropriately manage the risk of delivery issues as although Policy GDE1: Land at Rycote Lane allocates 7.8 hectares of land for employment purposes, it does not provide security that this employment need will be met if the site cannot be delivered.
- 37 Equally, irrespective of delivery of Rycote Lane allocation, the strategic requirement is a minimum and the delivery of additional employment would make an important positive contribution to the sustainable growth of the town.
- 38 If the Land at Rycote Lane is not able to be brought forward to deliver a minimum of 5.5 hectares of employment land, basic condition (d) for the order contributing to the achievement of sustainable development will not be met.
- 39 Appendix A of the Neighbourhood Plan includes the Neighbourhood Plan Masterplanning Report April 2024, prepared by AECOM. This report is referenced multiple times within the Neighbourhood Plan. This report provides a detailed assessment and masterplan concept for an employment Site 7, Howland Road. It is presented to 'deliver a logical extension to the employment areas within southern and eastern Thame' that will 'encourage active travel and will be constructed to the highest standards of energy efficiency.' Despite this strong and favourable assessment, this site is no longer allocated within the Neighbourhood Plan for employment. It is recommended that this allocation is included within the Neighbourhood Plan to contribute towards the delivery of the minimum of 5.5 hectares of employment land, to ensure basic condition (d) can be met.
- 40 This view is reinforced by a quote from the Town Council's planning officer's response to the growth scenarios assessment as set out within the SEA, June 2023, which states "with regards to employment land, Rycote Lane is the preferable site. It is, however, recognised that there are certain arguments for a quantum of new employment land


above that which could be delivered at Rycote Lane, once account is taken of onsite constraints.” This led to the allocation at Howland Road being brought forward as an additional larger employment site in earlier stages of this Neighbourhood Plan consultation.

- 41 In addition, the Consultation Statement Volume 1: Overview, February 2024, presents that the Land east of Howland Road/ South of Towersey Road received mostly support, with 48% of responses being agree or strongly agree compared to 29% that were either strongly disagree or disagree. It was summarised that a number of respondents were happy with the site, feeling it was a logical extension of the existing employment area.
- 42 The allocation of a second site for employment purposes at Howland Road would contribute positively to national policies, to strategic policies and to the achievement of sustainable growth at Thame and should be supported through the NP.

Delivering Sustainable Development

- 43 Finally, Hallam is supportive of many other aspects of the Neighbourhood Plan – not least the positive approach to the achievement of sustainable development objectives (a key basic condition test) through for instance policies to support the delivery of community facilities and services (SF01) its promotion of Sustainable Design and Construction (CPQ5) and encouragement given to self-build and custom build.
- 44 The realisation of such ambitions will be greatly enhanced by ensuring that a positive approach to housing need and employment – as outlined above – is at the heart of the NP.

Yours sincerely



Project Director

Email: @davidlock.com

Cc , Hallam Land

Response 30: ID ANON-MT75-C6HT-2

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 17:24:44

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Director

Organisation (if relevant):

JCPC

Organisation representing (if relevant):

Diagnostic Reagents

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4 Hawthorn Avenue

Address line 2:

Address line 3:

Postal town:

Thame

Post code:

OX9 2AS

Telephone number:

██████████

Email:

█@jcpc.org.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The comments are prepared and submitted on behalf of Diagnostic Reagents, the owners of the land allocated for housing development through draft Policies GDH1 and GDH1B, and located at the junction of Wenman Road and Chinnor Road. It is confirmed that the subject site is available, suitable and deliverable for residential development - as allocated in the Plan and identified in the above noted policies. Moreover, the Neighbourhood Plan has been through an extensive process of consultation, engagement and refinement with which we have fully been fully involved, supporting the Town Council and providing answers to technical queries and questions in relation to the site as they have arisen. The Town Council are to be congratulated on the thoroughness and rigour with which the Plan has been prepared, and which follows the very successful and ground-breaking TNP1.

We therefore support the Plan and the above noted policies/allocation in particular - and would be very happy to attend the Examination as required.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

None

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

[REDACTED]

Response 31: ID ANON-MT75-C636-F

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 17:53:44

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Simon Wood

Job title (if relevant):

█

Organisation (if relevant):

█

Organisation representing (if relevant):

████████████████████

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Address line 3:

Postal town:

██████

Post code:

██████

Telephone number:

██████████

Email:

████████████████████

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please find my comments relating to new builds and its impact with the revised TNP2:

National Planning Policy (in relation to land at Oxford road (GDH1d)), you state:

Making effective use of land

Achieving well designed and beautiful places

Protecting green belt

Meeting challenges of climate change and flooding

Conserving and enhancing the natural environment

Conserving and enhancing the historic environment

Comment: it seems yet again that the area near to the Cuttle Brook north/south corridor is yet again under threat from development. I appreciate the new plans submitted are 100 houses to be build, but I struggle to see where protecting the green belt , conserving and enhancing the natural environment is taken into consideration. Whilst I appreciate that new homes have to be provided, achieving the above (policy NEC1) would be liable for

failure due to the multifactorial issues around developing near this area. I live on Thame Meadows and we have had sewage leaks, rubble buried in our gardens covered with a thin layer of top soil to hide this as just a couple of examples. There have been obvious short cuts taken in order to get the houses up and sold and I suspect this will be the case of the houses being developed next to the Cuttle Brook Corridor. Can one confidently state that the Cuttle Brook will not be affected by run off pollution, leeching into the river of pollutants, destruction of habitat and so on, as a direct result of development near to this area?

"Conserving and enhancing the historic environment": The land planned for development is also historic in so far that the lie of the land reflect the medieval ridge and furrow techniques dating back to the 1700s. This is part of your policy *Conserving and enhancing the historic environment, paras 189 and 190 of the NPPF promoting and enhancement of heritage assets to ensure their enjoyment in the future (please refer to: <https://historicengland.org.uk/images-books/publications/iha-field-systems/heag204-field-systems/>)

Your policy (2.53 NEC1) therefore would be by and large negated by developing this area.
Your policy NESG (a) should ideally be explored to find underused green space.

Currently the land around the Cuttle Brook Corridor (to the west by the Bloor estate) was protected from development and to be maintained as green space and this was a legal document that was signed.

Sustainable development:


3.2 (third paragraph)... "making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change including moving to low carbon economy."

Comment: by developing this area, I fail to see how building 100 houses helps to improve bio-diversity around the Cuttle Brook corridor and minimising pollution (surely this would add to pollution). Bloor have modelled flooding in this area on a 100 year model plus 30% reflecting climate change. This January, the flooding stretched to the Cuttle Brook corridor and surrounding fields, to the extent that Bloor have had to reduce the number of houses that they would like to build and revise their boundaries. Point of note, their survey was not independent thus likely prone to reporting bias (i.e. it won't be Bloor's problem in 50 or a 100 years time!). This relates to policy NEC1 and NEF1.

Furthermore, policy NEC1 stipulates "the maintenance of the corridor" but additional housing will surely add to run off into the corridor and into the Cuttlebrook river causing further flooding down stream and into the Cuttle Brook itself. This is an recognised consequence of over-development.

I feel in conclusion that the policies that have been stated above will not be adhered to by developing the land off Oxford road and there seems to be contradictions to the policies versus the practicalities of building here.

Thank you for your time and patience reading this.


You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.


What changes do you consider necessary for the plan to meet the basic conditions?:

<https://historicengland.org.uk/images-books/publications/iha-field-systems/heag204-field-systems/>

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?


Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

There is so much information included in the TNP2 that this would have a wide reaching impact on most the residences of Thame. The amount of information in the TNP is bound to generate many questions and having a public hearing would be an ideal platform for questions and concerns to be answered

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

[REDACTED]

Response 32: ID ANON-MT75-C637-G

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 18:15:07

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Ian Cornish

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Note: Page numbers (pxx) refer to the document seen in Thame Library.

Area F, p35, 4.30 - between TNP1 & TNP2, there has been a "land swap", permitting the land opposite Lord Williams's School, beneath which there are known to be some archaeological remains, to stay fallow, and allocating the original Reserved Area, to the north and east of Thame Meadows to become a development area.

Who permitted this important land swap and when?

Bloor Homes has made 2 applications to develop in this once Reserved Area, meeting with a very considerable number of objections from residents and from various statutory bodies, yet these objections HAVE NOT BEEN ADDRESSED.

It is clear that there is climate change and the future will bring more frequent and heavier rainfall, making flooding around the Cuttlebrook and River Thame, seen in 2023/2024, a greater problem, which would only be exacerbated by building in this area.

The threat of future flooding in Thame and surrounding villages has been ignored!

p38 states that access to this area would be through the existing network of streets, yet the narrow Weavers Branch would be a major problem during any construction of 150 homes, and thereafter for the inhabitants of Weavers Branch and the new homes.

We note that p74, 5.28 mentions the need for mechanical ventilation & heat recovery, heat pumps & solar panels, whilst p76, 5.31 mentions rainwater harvesting - all good things which we have mentioned before, but were fobbed off because these are not yet included in current Building Regulations.

p91, 6.19 discusses shortage of parks, woods & orchards, and protection being crucial, whilst 6.21 & 22 state that loss of open space should be resisted, yet this part of Area F forms part of the Cuttlebrook corridor and the valued view from Oxford Road to the north.

p89, 6.13 & 6.17 states that Lord Williams's School will not expand, yet 150 homes would suggest some 150-300 extra youngsters, meaning that an inevitable reduction in places available to those outside the immediate catchment would seem to be ducking the future problem.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Objections by members of the public and various statutory bodies to both of Bloor Homes' plans have not been considered.

A swap of allocation in Area F has been undertaken without public consultation.

The threat of future flooding in Thame and surrounding villages has been ignored!

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 33: ID ANON-MT75-C6H9-7

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 18:28:30

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

Nichola Hewitt

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

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Address line 2:

Address line 3:

Postal town:

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I am commenting as a very concerned member of the community. Whilst I recognise the need for extra housing, I feel that some of the chosen sites are far from suitable. I make direct reference to the land at Oxford Road. This is a well known flood plain, and the information provided by the housing developer is not up to date or fit for purpose. I do not think that people would be able to get affordable housing insurance. The flood is already very close to the existing properties, and all it would take was for more rain to happen for this to worsen considerably. Hundreds of residents of Thame have mentioned similar concern which seem to have been ignored by Thame Town Council. Residents of local villages such as Shabbington and Waterstock have expressed worries about flooding increasing in their area due to the building on this flood plain. The Environment Agency has raised issues and mentioned that they would need to assess this independently because the applicant had modelled it inaccurately themselves. They then said that they object to the current proposal. The drainage assessment was also inadequate. Similar issues were raised in other developments which were ignored and they now find themselves in an irreversible situation where flooding is worse and they cannot do anything about it. I think we need to be thinking longer term and the negative impact this would have, not only on Thame, but also the surrounding areas.

This proposed development also directly contradicts the core principals of the neighbourhood plan, which state that flood plains should not be built upon, that there should always be a link to the countryside so that the town does not appear too built up, and also that green spaces should be preserved. If this development was to go ahead, houses would be built directly up to the ring road around Thame, going against what should be happening. To quote: The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk; Growth should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside. The field in question is actually home to a vast range of wildlife whose habitat would be lost.

In addition, I disagree when the Thame Town Council say that this land was voted on to become developed. When people were asked to vote, the land at Oxford Road which was put forward was actually different to the land now being considered. People voted thinking the houses would be built further up (nearer the entrance and away from the flooding). I am confident that if a new vote were to be done on the actual new proposed site that this would not get accepted. I also think it very deceitful to change location without putting it to a new vote.

Finally, as I said previously, there were hundreds of objections to this from concerned residents which seem to have gone ignored. There was also a

newspaper article in shock at the proposal, as well as a petition signed by nearly 1400 people against this development at Oxford Road. It is clear from that feedback that this is not something wanted by the residents of Thame, who also voted for this land to be kept as green space in the previous plan, a promise the council seem to now be going back on. I therefore urge you to reassess the inclusion of this site for development in this next neighbourhood plan.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

To reiterate, I urge you to remove the Oxford Road site as available for development to avoid flooding crises in the future.

You can upload supporting evidence here:

image0.jpeg was uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

I think the objections raised by a huge amount of people living in Thame about the land at Oxford Road should be heard.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:



Response 34: ID ANON-MT75-C6HW-5

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 21:02:32

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Director

Organisation (if relevant):

Savills

Organisation representing (if relevant):

Bloor Homes and Regeneration Thame Ltd

Address line 1:

Wytham Court

Address line 2:

11 West Way

Address line 3:

Postal town:

Oxford

Post code:

OX2 0QL

Telephone number:

Email:

█@savills.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please refer to the attached documents:

- Letter
- Plan (in box below)

You can upload supporting evidence here:

240704 - L RL - NHP2 Submission consultation response for Bloor Homes - draft v3.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Plan to accompany above letter

You can upload supporting evidence here:

SM5116-EN-1001 - Application Boundary PlanB.pdf was uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Points raised in the attached representations would be best articulated in an oral hearing session.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

24 July 2024

240704 - L RL - NHP2 Submission consultation response for Bloor Homes - draft v3



Planning Policy
Vale of White Horse District Council
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Oxfordshire
OX14 4SB

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Correspondence by email only to:

planning.policy@southandvale.gov.uk

Dear Sir/Madam

Representations to the Thame Neighbourhood Plan 2 (TNP2) Submission version consultation on behalf of Regeneration Thame Ltd and Bloor Homes – July 2024

Savills is instructed by Regeneration Thame Ltd (RTL) and Bloor Homes (BH) to make representations on the recently published Regulation 16 version of the Thame Neighbourhood Plan Revision.

Our Clients control land previously known as Site F, now known as “Oxford Road,” to the north-west of Thame.

Our clients made representations in August 2021, January 2022 and July 2023 in response to the earlier consultations on the Neighbourhood Plan Revision which are in part summarised in the Consultation Statement.

Those representations promoted the allocation of more housing at Oxford Road and resulted in the proposed allocation in the TNP2. We have read the consultation documents, including the Basic Conditions Statement and have the following comments to make.

In summary our Clients:

- Recognise the efforts Thame Town Council (TTC) has gone in to get to this stage.
- Support the allocation of land at Oxford Road for residential development and note that it received 42.4% of the votes in support at the consultation by TTC (see Consultation Statement Feb 2024, Volume 3a, paragraph 3.2). But to acknowledge that the site can accommodate at least 120 dwellings.
- Recommend the concept masterplans are removed from the TNP2 document given ongoing technical work and their illustrative nature.
- Define housing numbers as “at least XX dwellings” to align with the approach in the Local Plan to define minimum housing numbers.
- There are varying scale plans and some conflict with others such that they need amendments.
- In particular we request amendments to the plan of open space to provide flexibility in line with the concept masterplan approach
- Invite changes to the wording of several policies to remove contradictions, improve clarity and ensure Basic Conditions are met.

Further detail on the above are outlined below.

Introduction

Our Clients recognise the hard work and resources that have gone in to get to submission stage. The comments set out below are aimed at ensuring the plan meets the Basic Conditions, is compliant with planning policy and is ultimately deliverable.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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As per our previous consultation responses our Clients control the entirety of the Oxford Road site (as shown outlined in red on the figure 14 in TNP2). There is currently a planning application with South Oxfordshire District Council, submitted in December 2023, (planning ref: P23/S4262/FUL) for the entire site. The description of development is: *“full application for 154 residential dwellings including new highways, associated infrastructure, sustainable urban drainage systems, pumping stations, demolition of agricultural buildings, green infrastructure and ancillary works”*

The application shows two phases (an eastern parcel, known as Phase 2, and a western parcel, known as Phase 3). The application proposals align well with the concept masterplan as proposed in the TNP2. It should be noted that at the Regulation 14 consultation (May 2023), undertaken by TTC the same area of land at Oxford Road was proposed for 150 dwellings, now approximately 100 dwellings. It seems to us that changes made in response to representations received at the Regulation 14 stage have been addressed.

Since the initial submission, our Clients have held positive discussions on amendments to the proposals with South Oxfordshire District Council (SODC) officers and have kept TTC informed. The discussions have focused on the boundaries of the two development parcels, in particular how development relates to the views from Oxford Road towards the corridor of land to the west of the Cuttlebrook, the boundary to the conservation area and the boundary of the flood plain.

We expect to submit amendments to the planning application later this summer, ahead of any public examination of the TNP2. This should give the Examiner comfort that the proposed allocation is deliverable and will proceed early in the Plan period as soon as consent is granted.

Strategic Policies in the Development Plan

The strategic policies of relevance are set out in the South Oxfordshire Local Plan 2035, adopted in December 2020. The strategic policies note the following in relation to Thame:

- STRAT1: Overall Strategy – “supports the role ofThame.... by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure”. The text recognises the sustainable nature of Thame as a location for development.
- STRAT2: South Oxfordshire Housing and Employment Requirements – this sets out a minimum housing requirement of 18,600 homes between 1 April 2011 and 31 March 2035, to be delivered in accordance with the spatial strategy in STRAT1.
- STRAT5: Residential Density – this states: *“Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density.”*

In addition the following policy is of relevance:

- TH1 – Strategy for Thame – sets out a number of criteria that the TNP2 is expected to comply with including delivering homes in accordance with Policy H3.
- Policy H3 – Housing in Towns of Henley, Thame and Wallingford – states that a minimum housing requirement of 3,873 homes will be delivered in the towns of Henley, Thame and Wallingford. With “at least 1,518 homes” at Thame.

These are covered in the Basic Conditions Statement. We agree with the policies listed.

Vision and Objectives

Our Clients support the Vision set in the TNP2 document.

In relation to the Objectives, Objective 3 seems to conflict with the proposed allocations. Any development will impact on the landscape setting of Thame. As such we would recommend that the wording is amended to refer to proposals for growth on sites not allocated avoiding impacting the landscape setting of Thame.

Suggested Action
<p>1. Amend Objective 3 to read (changes in bold):</p> <p>“Growth beyond those sites allocated in the Plan should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside.”</p>

Housing Requirement in the TNP2

TNP2 covers the period 2020 to 2041. The adopted SODC Local Plan only covers the period up to 2036. Whilst SODC has consulted (Regulation 18) on an emerging joint local plan with Vale of White Horse District Council, the plan is at an early stage of preparation and little to no weight can be given to the draft policies contained within it.

The emerging local plan refers to a housing figure of “*at least 143 homes*” in Thame up to 2041 over the period 2021-2041. It is however, unclear how this figure has been derived when the overall target over the plan period ranges from between 628-811 homes a year. It is simply too early in the plan making process to determine what the level of housing will be for Thame. It is a highly sustainable location with an impressive range of services, employment and facilities to support further development. We do not consider the 143 figure to be realistic to meet the objectives of the plan over the next 17 years.

In addition, from the adopted Thame Neighbourhood Plan (TNP1) land off Oxford Road was allocated for 203 dwellings plus a reserve allocation of 78 dwellings. The reserve allocation has not yet been used. It is unclear whether this is included in the housing figure or not.

It is accepted that the TNP2 seeks to allocate land for approximately 250 dwellings which goes above the figure in the emerging SODC plan. However, it should be noted that:

- The SODC emerging Local Plan is at an early stage of delivery and the housing numbers may change, particularly in light of the new Government’s approach to boosting the supply of housing and the potential need to meet a further element of unmet need from Oxford City.
- There are no other housing numbers proposed for other sustainable market towns, only Thame suggesting there has not been a thorough break down across the whole of the plan area.
- That all housing figures are expressed as “at least” ie a minimum target. This is supported by the NPPF, paragraph 61 which refers to “minimum” when referring to housing numbers.
- That the Government’s objective in the NPPF is to “significantly boost the supply of homes” (see chapter 5).
- That there is a high demand for affordable homes (AECOM report indicates a net shortfall over the plan period of 447 affordable dwellings) and specialist housing in Thame that may justify a higher housing requirement.

- The AECOM Housing Needs Assessment does not set out a clear assessment of the housing requirement to assess if the figure proposed is correct or not.

Our Clients consider that until a clear table on housing requirements and previous commitments and completions is provided to demonstrate that the TNP2 conforms with the Strategic Policies in the Development Plan and NPPF it is not possible to determine if the Plan meets the Basic Conditions as required.

Suggested Action
<ol style="list-style-type: none"> 2. Set out a detailed housing requirement table including all completions and commitments over the plan period and an assessment of need, taking account of the level of affordable and specialist housing. 3. To assess this against the strategic policies in the SODC Local Plan and NPPF to ensure the Basic Conditions are met. 4. To acknowledge that the housing numbers on each allocated site are a minimum housing requirement by using the words “at least” instead of “approximately” which could imply higher or lower.

Notwithstanding the above, the approximate housing numbers allocated to each site can only be a guide at this stage given that it will depend on the precise layout, design and housing mix proposed at the application stage. The wording in the TNP2 should align with that in the emerging Local Plan which uses the term “at least”.

In the case of the Oxford Road site, there is the benefit of the extant full planning application to more accurately assess the likely capacity of the site. Whilst originally submitted for 154 dwellings, through discussion with SODC officers it is expected that the housing number in the planning application across the two sites will be at least 120 dwellings. This is making effective use of the land and meeting the other TNP2 and SODC Local Plan policy requirements. This 20% increase in housing numbers is still in accordance with the TNP2 policy and the NPPF requirements to make effective use of land. But in order to meet the Basic Conditions policy GDH1 and GDH1d should be amended to refer to “at least 120 dwellings”.

Suggested Action
<ol style="list-style-type: none"> 1. Amend the housing figure for land at Oxford Road to “at least 120 dwelling” - to align with the SODC Local Plan. 2. Add a reference to the housing numbers being a minimum – to align with the NPPF.

The Oxford Road Allocation

Our Clients fully support the allocation of the site at Oxford Road for further residential development in the TNP2 under policy GDH1 and GDH1d but raise issues regarding the detail in the allocation policies and the wider TNP2 policies. As mentioned above, our Clients are pursuing a planning application which demonstrates the deliverability and capacity of the site.

Policy GDH1d proposes that the Oxford Road allocations can deliver “*approximately 100 homes*”, split 30 and 70 across Phases 2 and 3 respectively.

As set out above, our Clients consider that the use of the word approximately should be amended to “at least” so that it is clear the figure is a minimum quantum of development and also aligns with the terminology in the SODC Local Plan. This is clearly indicated under criterion 10 of Policy GDH1 – which confirms that the “*overall quantum and timing of development of the allocated sites will be subject to the design and masterplanning process for each site, the availability and capacity of infrastructure to support development.*”

Our clients’ masterplanning work has consistently shown that a higher number of new homes can be delivered across these two sites. The latest masterplan shows at least 120 dwellings split approximately 50-60 on Phase 2 (eastern parcel) and approximately 60-70 on Phase 3 (north-western parcel). In light of this the splits indicated in TNP2 seem arbitrary and we would recommend that the overall number in TNP2 should be updated accordingly and that the split should be an indication at best (if the split is needed at all).

It is noted that the Basic Conditions Statement does not reference effective use of land in relation to this policy which is a failing.

Criterion 2 of Policy GDH1d lists eleven principles that any proposed development of Phases 2 and 3 should follow. Our clients’ response to these are summarised in the below table:

Requirement	Response
<p>The layout of development should be based on perimeter blocks, reflecting the layout of adjacent housing (at Thame Meadows), incorporating children’s play space and areas for sustainable urban drainage.</p>	<p>The proposals will reflect the layout form established at Thame Meadows, so they appear as an extension of this estate.</p>
<p>The density of development shall be consistent with the density of the adjacent Thame Meadows housing development.</p>	<p>This is a reasonable starting point but Local Plan Policy STRAT5 is clear developments must optimise the use of land and site potential. It also states, “<i>Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities.</i> It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified reasons for a lower density”</p> <p>The Thames Meadows development was built at a lower density than is now required by the current Development Plan and this should be recognised. It does not simply follow that the density of the new allocation should follow this. Our Clients support high quality development but also note the clear approach in the NPPF to make effective use of land. STRAT5 is clear that “<i>planning permission will only be granted where it can be demonstrated that the proposal optimises the use of land and potential of the site.</i>”</p> <p>Making efficient use of land is also a key element of the NPPF – see Chapter 11 “<i>Making Effective Use of Land</i>”.</p>

	<p>Criterion 2b should be amended to ensure it is consistent with STRAT5 of the Local Plan and therefore meet the Basic Conditions.</p>
<p>Landscaped green corridors and noise mitigation measures shall be provided along the edges of the development areas, including screening to the A418.</p>	<p>The noise modelling undertaken in respect of the current applications has shown noise can be mitigated through measures such as suitable glazing and layout features.</p> <p>The bund proposed will buffer Phase 3 from the A418 and will provide a landscaped green feature.</p>
<p>The development should minimise the impact of views along the Cuttle Brook looking north from Oxford Road and from the A418, minimising the impact on the landscape to the north of the site. The Cuttle Brook Corridor itself shall also be protected in line with Policy NEC1.</p>	<p>In response to earlier representations at the Regulation 14 Plan appropriate boundaries of the development parcel have been established. This is shown on the attached plan.</p> <p>As set out above, the concept masterplans should be deleted from the TNP2 document. The Masterplanning Report is referred to in the policies and therefore having extracts from that document serves no purpose.</p> <p>If they are retained then the concept masterplan for land off Oxford Road should be updated to reflect the latest masterplanning work undertaken to inform the planning application.</p>
<p>The layout, scale and massing of development shall seek to avoid harm to the Conservation Area and listed buildings within close proximity to the site, with development set back from the cluster of listed farm buildings and allowing for retention of views to these from the permissive footpath to the east.</p>	<p>As above the amended scheme has the support of the SODC Council's Conservation Officer.</p> <p>The TNP2 should be amended as suggested in relation to the Cuttle Brook corridor.</p>
<p>There should be no net loss in the quantum of open space across the allocation. Where possible, land provided as open space for the Thame Meadows development shall be retained and integrated into the network of green infrastructure to be provided as part of new development.</p>	<p>As our clients have control over the entirety of the Site Allocation Area this criterion can be met. The existing network of permissive footpaths will be retained alongside the proposed development and expanded into new areas.</p> <p>The development will allow the public to use a much greater area of open space than is currently possible. Public access across the current open space areas is limited to permissive paths only (as controlled in a S106 Agreement). The overall quantum of publicly accessible open space will be increased significantly relative to the current situation.</p> <p>As such criterion F should acknowledge that current access is via a network of permissive paths only.</p>
<p>New areas of publicly open space, of at least equal size and quality to any existing open space lost as a result of development, must be provided in an</p>	<p>The current application demonstrates how this can be achieved with each Phase benefiting from an area of managed open space immediately adjacent</p>

<p>equally accessible location as part of the development. Where land is to be provided as open space this should not be located where users would be subject to unacceptable noise levels.</p>	<p>to the built form of a “like for like” size to the developable area of each Phase. This provides a major benefit over the current situation which is limited to defined permissive paths.</p> <p>These areas will be equipped and managed in a similar manner to the current arrangements for Thame Meadows. These areas will not experience any undue noise disturbance.</p>
<p>An area of parkland shall be provided within the flood plain. Liaison with the Environment Agency during the application process will be required to assess the need for sequential and exception tests to be undertaken. This shall include wetland areas with paths through this that are designed to enable access in all conditions.</p>	<p>Noted. Paths designed to be accessed in all conditions may not be sensible, for example if land is in flood it would not be appropriate to encourage access due to health and safety reasons. This should be amended accordingly.</p>
<p>Land subject to archaeological interest shall be retained as open space.</p>	<p>This should be amended to also refer to be being retained as either agricultural land and/or open space.</p>
<p>Walking and wheeling routes shall be provided that connect development with the surrounding open space and footpath network, including those along the Cuttle Brook, and along Oxford Road providing connections to the town centre.</p>	<p>– The current application will provide links to Oxford Road to complement the Town Council proposal for an all-weather footpath through Rycote Meadow towards Oxford Road (Planning Ref: P24/S1463/LDP)</p>
<p>Vehicular access shall be via the existing network of streets in the Thame Meadows development.</p>	<p>This is proposed in current application</p>
<p>Streets within areas of development shall incorporate tree planting.</p>	<p>This is proposed in current application</p>
<p>Existing trees and hedgerows shall be retained where possible, and biodiversity net gain delivered on the site.</p>	<p>Where the removal of any existing features is unavoidable, replacement planting will be offered within the relevant phase</p> <p>A dedicated new habitat offering at least policy compliant levels of biodiversity net gain will be delivered on site and will benefit from a long-term management regime. However, the policy should reflect the ability to deliver biodiversity net gain off-site if it is not possible to meet the full criteria on site. This would align with the policies in the Local Plan and therefore meet the Basic Conditions. The current wording is more restrictive.</p>

The Oxford Road Concept Plan

Our main concern is the inclusion of the concept masterplans in the TNP2 document and the varying scales and level of detail on the various other plans. There are also a number of inconsistencies with the plans as will be discussed below.

The concept masterplans are noted as being indicative and illustrative through criterion 11 of policy GDH1 that states that “*proposals for development of the allocated sites are expected to accord with the principles established in the Thame Masterplanning Report.*”

The TNP2 allocates the land within the red line, for example in Figure 14 for land at Oxford Road. However the concept masterplans are illustrative. For example, the introduction to the Masterplanning Report (paragraph 1.1) clearly states “*..these design concepts are high level and illustrative, prepared to demonstrate how the design principles that the Neighbourhood Forum wishes to promote could be applied on the sites. We [AECOM] have not undertaken technical studies on topics such as ecology, ground conditions, traffic or drainage. It is expected that full co-design exercise are undertaken by the applicants on the sites. This report is just a step in that direction, enabling stakeholders to progress from an informed position.*”

It is not clear what the “Principles” are, especially in relation to the concept masterplan and boundaries of the parcels. For example the eastern boundary of the eastern parcel is shown to stop short of a “view” shown on the Concept Plan. It does not appear the importance and position of this view has been informed by any landscape appraisal based on Verified Views. Our Client’s application has been informed by a full Landscape and Visual Appraisal (LVIA) that shows how development can come further eastwards. This development edge has been verbally agreed with the Landscape officer at SODC.

The definition of Principles should be clarified to avoid any issues around interpretation.

Given the above, the additional, smaller red lines on the concept plans are confusing and it would be best to remove the concept plans from the TNP2 document and rely on the Masterplanning document. In addition, for the land off Oxford Road, the extensive technical work and discussions with the local planning authority has moved the masterplanning process on. There are clear discrepancies which would be best aligned. For example, the view cone from the Oxford Road is shown to reduce the development parcel to a much greater degree than the technical studies prove. Given this there is an increased ability to accommodate development on the site, whilst meeting the “principles set out in the Masterplanning Report. We would recommend that the two should align.

The Plan (at Figure 15) and the Thame Master planning Report (at Figure 70) are also slightly different and we suggest that if the concept plan is retained in the TNP2 that the same plan is used in both reports to avoid any issues around interpretation arising.

Separately, Figure 70 refers to Phase 3 as “Site West” whilst it is named “Site Northwest” in Figure 15. The labelling should be made consistent to avoid confusion.

Suggested Action
<ol style="list-style-type: none"> 1. Delete the concept masterplans from the TNP2 document. 2. Clarify in the TNP2 and/or in the Masterplan Report what the “Principles” are and that the boundaries of parcels on the concept masterplans are not fixed. 3. Amend the concept masterplan for land off Oxford Road to better align with the emerging planning application scheme which has been informed by detailed technical assessment work and is verbally agreed with SODC technical officers.

The Remainder of the TNP2

GDH2 – Housing Type, Tenure and Mix

The housing mix requirements in Policy GDH2 are supported as they reflect the conclusions of a relatively up to date Housing Needs Assessment (HNA) dating from March 2022 that reflects housing trends in Thame. As

the Oxford Road development has come forward as a single application, it is important that the proposed market housing mix is assessed in totality rather than this policy’s requirement being applied to an individual phase.

The requirement for First Homes at 50% discount will have a significant impact on the viability of the affordable housing as a whole and therefore the ability to deliver other affordable housing products particularly affordable rent which is identified as a key objective. As such a degree of flexibility should be built in to the policy to account for viability issues.

Furthermore, it is important that site context is taken into account. Given the Oxford’s Road’s edge of town location, larger family housing is more appropriate and should be provided in a greater proportion.

GDV1 – Visitor Economy

The wording in Policy GDV1 criterion 2 should be amended to make it clear that it is only where new build development is for visitor economy related uses. As currently written this would apply to all development. Revised wording suggested below:

Suggested Action
<p>1. Amend GDV1 criterion 2 to read:</p> <p>“Applicants Applications for new build tourist/visitor related development will be required to demonstrate that:.....”</p>

CPQ1 – Design in Response to Local Character

The design criteria in Policy CPQ1 are reasonable. As discussed above, the density of the immediate surroundings to a development site (criterion k) is a useful starting point but local and national requirements to ensure an efficient use of land must also be considered to ensure the policy meets the Basic Conditions.

CPQ5 – Sustainable Design and Construction

This policy should align with the policies in the Local Plan. It is important that, in applying this policy, Building Regulation requirements are borne in mind along with the Written Ministerial Statement in relation to duplicating policy requirements. Building Regulations may eventually supersede these policy criteria. As currently drafted it is questioned if it meets the Basic Conditions.

CPQ6 – Street Hierarchy

This Policy offers quite specific design guidance that our Clients consider would be best incorporated into Section 5 of the Design Code rather than be provided as an individual policy in the main document.

CPQ7 – Parking in Residential Areas

Policy CPQ7 offers very detailed requirements on residential parking which is best provided as a part of the Design Code, with illustrations. As drafted, the policy is excessively wordy and difficult to follow.

Existing Open Space/SF02

Figure 26 sets out important areas of open space to be protected and retained under policy SF02. Our Clients are very concerned by this plan for the following reasons:

- In relation to the site at Oxford Road the south-western parcel of open space (see extract below) will remain open but will be retained as agricultural land but with permissive paths around it. The policy and plan do not differentiate between open space and agricultural land which could lead to confusion ie the plan gives the impression of public access to the areas which is not going to be the case for all of the land.



Extract from Fig 26 in TNP2 showing open space at Oxford Road site

- The north-eastern parcel is strongly defined and leaves no flexibility to respond to the points raised above in relation to the eastern boundary of the parcels. To reiterate, the concept masterplan is not based on any technical assessment work and can only be treated as an indicative line at this stage. The way around this would be to use the boundary in the extant planning application to define the parcels and then update figure 26 accordingly.
- In addition, where open space is re-provided it could offer greater functionality/public access and therefore could be a smaller area of land if providing such greater benefit.

Policy SF02 should be amended as below:

Suggested Action

1. Amend SF02 to read:
 "4. Land defined as 'important green spaces', 'other amenity green spaces', or 'sports pitches' on Figure 26 should be protected and retained in line with NPPF's guidance on open spaces, **unless:**
2. i. ~~Proposals that result in the loss of open space as defined in Clause 4~~ **it is** must be replaced with open space of equal size, similar or higher quality, **the same or greater functionality/public access** and where it is accessible to and in reasonable journey times to the community....

NEB1 – Biodiversity

There is a contradiction in the policy - criteria 1 refers to the SODC mitigation hierarchy which allows for off-site provision if it has first been demonstrated that on-site provision is not possible. However the policy requires

a minimum of 10% “on-site”. Criteria 2 then refers to provision off-site where this is not possible. The wording of the policy could be made clearer.

NEC1 – The Cuttlebrook Corridor

Figure 28 in the TNP2 defines the extent of the Cuttle Brook Nature Reserve and Wider Cuttle Brook Corridor. To the north of Oxford Road, the wider corridor is crudely defined (the line is circa 50 m wide) and does not relate to any particular features on the ground (see extract below). If the plan is to be used in assessing proposals it should be to a smaller scale and the boundary line justified in relation to on-site features.

This is a common theme for a number of the plans in the TNP2 that are of varying scales and levels of precision.



Extract from Figure 28 – Cuttle Brook Corridor

GAP1: The Phoenix Trail

Figures 31, 33 and 34 under the above policy include a green arrow that implies open space. These are in conflict with the site allocation policy GDH1d and should be amended accordingly. A suitably worded key should also be provided to define what the green corridor is suggesting.

Conclusion

Generally the TNP2 is supported. However, there are several elements of the plan that need to be amended to ensure the Basic Conditions are met. The site off Oxford Road is at an advanced stage of a full planning application and detailed technical reports have informed the layout of the proposals. This work can be utilised to better inform the various plans and figures in the TNP2 document to ensure it is robust and makes effective use of land in line with the requirements in the Local Plan and NPPF.

We trust that the above provides a useful contribution to the process, however, should you have any points of clarification or require any further details please do not hesitate to contact me at the above address. Through the submission of this representation our clients request that a hearing session is needed to ensure the above issues are adequately understood and we therefore request the opportunity to appear at any public hearing held as part of the Examination of TNP2.

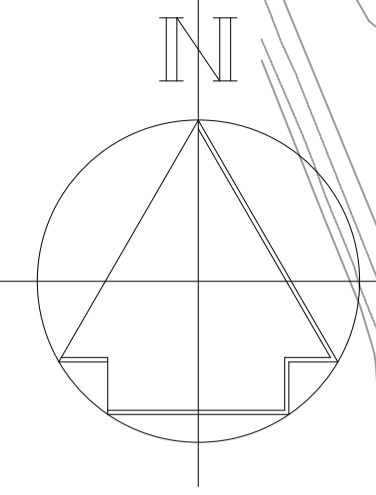
Yours faithfully



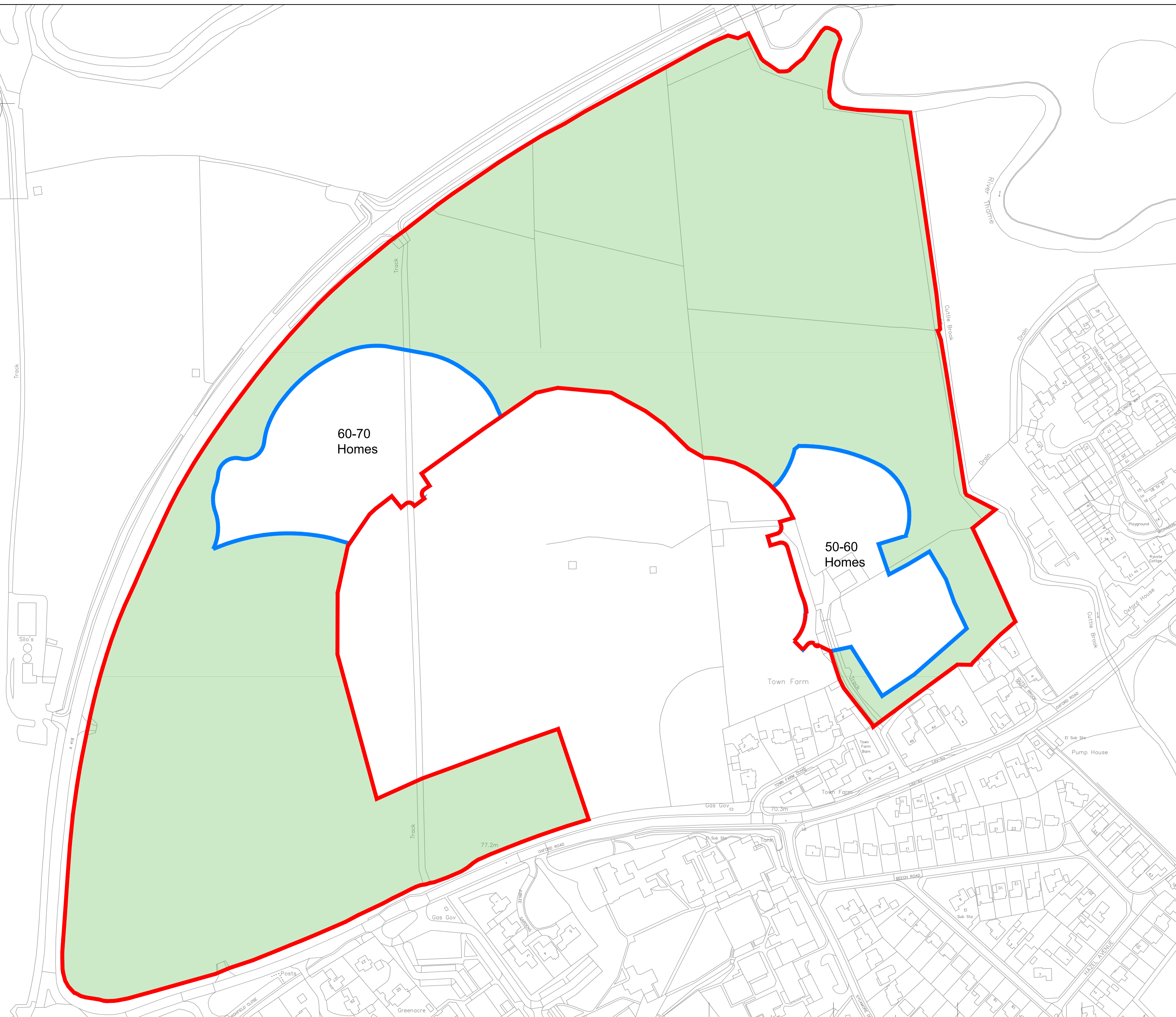
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Enc



- Key:**
- Allocation Boundary
 - Indicative Development Cells
 - Green Infrastructure



***For illustrative purposes only**

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Job:	OXFORD ROAD THAME
Title:	
Scale:	NTS@A1
Date:	19.07.24
Drawn:	HB
Checked:	DJ

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Response 35: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 21:06

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agency

2 Please provide your contact details below.

Title:

Name:
[REDACTED]

Job title (if relevant):

Associate

Organisation (if relevant):

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Organisation representing (if relevant):

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Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please see attached comments submitted on behalf of Bloor Homes and Regeneration Thame in relation to the Thame Neighbourhood Plan.

We have submitted these documents under the consultation portal as well.

The details for the agent are:

Robert Linnell

Director

Savills

On behalf of Bloor Homes and Regeneration Thame Ltd

Savills

Wytham Court

11 West Way

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OX2 0QL

07870999105

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Please can you acknowledge safe receipt.



Head of Department
Planning

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

24 July 2024

240704 - L RL - NHP2 Submission consultation response for Bloor Homes - draft
v3



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Dear Sir/Madam

Representations to the Thame Neighbourhood Plan 2 (TNP2) Submission version consultation on behalf of Regeneration Thame Ltd and Bloor Homes – July 2024

Savills is instructed by Regeneration Thame Ltd (RTL) and Bloor Homes (BH) to make representations on the recently published Regulation 16 version of the Thame Neighbourhood Plan Revision.

Our Clients control land previously known as Site F, now known as “Oxford Road,” to the north-west of Thame.

Our clients made representations in August 2021, January 2022 and July 2023 in response to the earlier consultations on the Neighbourhood Plan Revision which are in part summarised in the Consultation Statement.

Those representations promoted the allocation of more housing at Oxford Road and resulted in the proposed allocation in the TNP2. We have read the consultation documents, including the Basic Conditions Statement and have the following comments to make.

In summary our Clients:

- Recognise the efforts Thame Town Council (TTC) has gone in to get to this stage.
- Support the allocation of land at Oxford Road for residential development and note that it received 42.4% of the votes in support at the consultation by TTC (see Consultation Statement Feb 2024, Volume 3a, paragraph 3.2). But to acknowledge that the site can accommodate at least 120 dwellings.
- Recommend the concept masterplans are removed from the TNP2 document given ongoing technical work and their illustrative nature.
- Define housing numbers as “at least XX dwellings” to align with the approach in the Local Plan to define minimum housing numbers.
- There are varying scale plans and some conflict with others such that they need amendments.
- In particular we request amendments to the plan of open space to provide flexibility in line with the concept masterplan approach
- Invite changes to the wording of several policies to remove contradictions, improve clarity and ensure Basic Conditions are met.

Further detail on the above are outlined below.

Introduction

Our Clients recognise the hard work and resources that have gone in to get to submission stage. The comments set out below are aimed at ensuring the plan meets the Basic Conditions, is compliant with planning policy and is ultimately deliverable.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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As per our previous consultation responses our Clients control the entirety of the Oxford Road site (as shown outlined in red on the figure 14 in TNP2). There is currently a planning application with South Oxfordshire District Council, submitted in December 2023, (planning ref: P23/S4262/FUL) for the entire site. The description of development is: *“full application for 154 residential dwellings including new highways, associated infrastructure, sustainable urban drainage systems, pumping stations, demolition of agricultural buildings, green infrastructure and ancillary works”*

The application shows two phases (an eastern parcel, known as Phase 2, and a western parcel, known as Phase 3). The application proposals align well with the concept masterplan as proposed in the TNP2. It should be noted that at the Regulation 14 consultation (May 2023), undertaken by TTC the same area of land at Oxford Road was proposed for 150 dwellings, now approximately 100 dwellings. It seems to us that changes made in response to representations received at the Regulation 14 stage have been addressed.

Since the initial submission, our Clients have held positive discussions on amendments to the proposals with South Oxfordshire District Council (SODC) officers and have kept TTC informed. The discussions have focused on the boundaries of the two development parcels, in particular how development relates to the views from Oxford Road towards the corridor of land to the west of the Cuttlebrook, the boundary to the conservation area and the boundary of the flood plain.

We expect to submit amendments to the planning application later this summer, ahead of any public examination of the TNP2. This should give the Examiner comfort that the proposed allocation is deliverable and will proceed early in the Plan period as soon as consent is granted.

Strategic Policies in the Development Plan

The strategic policies of relevance are set out in the South Oxfordshire Local Plan 2035, adopted in December 2020. The strategic policies note the following in relation to Thame:

- STRAT1: Overall Strategy – “supports the role ofThame.... by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure”. The text recognises the sustainable nature of Thame as a location for development.
- STRAT2: South Oxfordshire Housing and Employment Requirements – this sets out a minimum housing requirement of 18,600 homes between 1 April 2011 and 31 March 2035, to be delivered in accordance with the spatial strategy in STRAT1.
- STRAT5: Residential Density – this states: *“Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density.”*

In addition the following policy is of relevance:

- TH1 – Strategy for Thame – sets out a number of criteria that the TNP2 is expected to comply with including delivering homes in accordance with Policy H3.
- Policy H3 – Housing in Towns of Henley, Thame and Wallingford – states that a minimum housing requirement of 3,873 homes will be delivered in the towns of Henley, Thame and Wallingford. With “at least 1,518 homes” at Thame.

These are covered in the Basic Conditions Statement. We agree with the policies listed.

Vision and Objectives

Our Clients support the Vision set in the TNP2 document.

In relation to the Objectives, Objective 3 seems to conflict with the proposed allocations. Any development will impact on the landscape setting of Thame. As such we would recommend that the wording is amended to refer to proposals for growth on sites not allocated avoiding impacting the landscape setting of Thame.

Suggested Action
<p>1. Amend Objective 3 to read (changes in bold):</p> <p>“Growth beyond those sites allocated in the Plan should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside.”</p>

Housing Requirement in the TNP2

TNP2 covers the period 2020 to 2041. The adopted SODC Local Plan only covers the period up to 2036. Whilst SODC has consulted (Regulation 18) on an emerging joint local plan with Vale of White Horse District Council, the plan is at an early stage of preparation and little to no weight can be given to the draft policies contained within it.

The emerging local plan refers to a housing figure of “*at least 143 homes*” in Thame up to 2041 over the period 2021-2041. It is however, unclear how this figure has been derived when the overall target over the plan period ranges from between 628-811 homes a year. It is simply too early in the plan making process to determine what the level of housing will be for Thame. It is a highly sustainable location with an impressive range of services, employment and facilities to support further development. We do not consider the 143 figure to be realistic to meet the objectives of the plan over the next 17 years.

In addition, from the adopted Thame Neighbourhood Plan (TNP1) land off Oxford Road was allocated for 203 dwellings plus a reserve allocation of 78 dwellings. The reserve allocation has not yet been used. It is unclear whether this is included in the housing figure or not.

It is accepted that the TNP2 seeks to allocate land for approximately 250 dwellings which goes above the figure in the emerging SODC plan. However, it should be noted that:

- The SODC emerging Local Plan is at an early stage of delivery and the housing numbers may change, particularly in light of the new Government’s approach to boosting the supply of housing and the potential need to meet a further element of unmet need from Oxford City.
- There are no other housing numbers proposed for other sustainable market towns, only Thame suggesting there has not been a thorough break down across the whole of the plan area.
- That all housing figures are expressed as “at least” ie a minimum target. This is supported by the NPPF, paragraph 61 which refers to “minimum” when referring to housing numbers.
- That the Government’s objective in the NPPF is to “significantly boost the supply of homes” (see chapter 5).
- That there is a high demand for affordable homes (AECOM report indicates a net shortfall over the plan period of 447 affordable dwellings) and specialist housing in Thame that may justify a higher housing requirement.

- The AECOM Housing Needs Assessment does not set out a clear assessment of the housing requirement to assess if the figure proposed is correct or not.

Our Clients consider that until a clear table on housing requirements and previous commitments and completions is provided to demonstrate that the TNP2 conforms with the Strategic Policies in the Development Plan and NPPF it is not possible to determine if the Plan meets the Basic Conditions as required.

Suggested Action
<ol style="list-style-type: none"> 2. Set out a detailed housing requirement table including all completions and commitments over the plan period and an assessment of need, taking account of the level of affordable and specialist housing. 3. To assess this against the strategic policies in the SODC Local Plan and NPPF to ensure the Basic Conditions are met. 4. To acknowledge that the housing numbers on each allocated site are a minimum housing requirement by using the words “at least” instead of “approximately” which could imply higher or lower.

Notwithstanding the above, the approximate housing numbers allocated to each site can only be a guide at this stage given that it will depend on the precise layout, design and housing mix proposed at the application stage. The wording in the TNP2 should align with that in the emerging Local Plan which uses the term “at least”.

In the case of the Oxford Road site, there is the benefit of the extant full planning application to more accurately assess the likely capacity of the site. Whilst originally submitted for 154 dwellings, through discussion with SODC officers it is expected that the housing number in the planning application across the two sites will be at least 120 dwellings. This is making effective use of the land and meeting the other TNP2 and SODC Local Plan policy requirements. This 20% increase in housing numbers is still in accordance with the TNP2 policy and the NPPF requirements to make effective use of land. But in order to meet the Basic Conditions policy GDH1 and GDH1d should be amended to refer to “at least 120 dwellings”.

Suggested Action
<ol style="list-style-type: none"> 1. Amend the housing figure for land at Oxford Road to “at least 120 dwelling” - to align with the SODC Local Plan. 2. Add a reference to the housing numbers being a minimum – to align with the NPPF.

The Oxford Road Allocation

Our Clients fully support the allocation of the site at Oxford Road for further residential development in the TNP2 under policy GDH1 and GDH1d but raise issues regarding the detail in the allocation policies and the wider TNP2 policies. As mentioned above, our Clients are pursuing a planning application which demonstrates the deliverability and capacity of the site.

Policy GDH1d proposes that the Oxford Road allocations can deliver “*approximately 100 homes*”, split 30 and 70 across Phases 2 and 3 respectively.

As set out above, our Clients consider that the use of the word approximately should be amended to “at least” so that it is clear the figure is a minimum quantum of development and also aligns with the terminology in the SODC Local Plan. This is clearly indicated under criterion 10 of Policy GDH1 – which confirms that the “*overall quantum and timing of development of the allocated sites will be subject to the design and masterplanning process for each site, the availability and capacity of infrastructure to support development.*”

Our clients’ masterplanning work has consistently shown that a higher number of new homes can be delivered across these two sites. The latest masterplan shows at least 120 dwellings split approximately 50-60 on Phase 2 (eastern parcel) and approximately 60-70 on Phase 3 (north-western parcel). In light of this the splits indicated in TNP2 seem arbitrary and we would recommend that the overall number in TNP2 should be updated accordingly and that the split should be an indication at best (if the split is needed at all).

It is noted that the Basic Conditions Statement does not reference effective use of land in relation to this policy which is a failing.

Criterion 2 of Policy GDH1d lists eleven principles that any proposed development of Phases 2 and 3 should follow. Our clients’ response to these are summarised in the below table:

Requirement	Response
<p>The layout of development should be based on perimeter blocks, reflecting the layout of adjacent housing (at Thame Meadows), incorporating children’s play space and areas for sustainable urban drainage.</p>	<p>The proposals will reflect the layout form established at Thame Meadows, so they appear as an extension of this estate.</p>
<p>The density of development shall be consistent with the density of the adjacent Thame Meadows housing development.</p>	<p>This is a reasonable starting point but Local Plan Policy STRAT5 is clear developments must optimise the use of land and site potential. It also states, “<i>Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities.</i> It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified reasons for a lower density”</p> <p>The Thames Meadows development was built at a lower density than is now required by the current Development Plan and this should be recognised. It does not simply follow that the density of the new allocation should follow this. Our Clients support high quality development but also note the clear approach in the NPPF to make effective use of land. STRAT5 is clear that “planning permission will only be granted where it can be demonstrated that the proposal optimises the use of land and potential of the site.”</p> <p>Making efficient use of land is also a key element of the NPPF – see Chapter 11 “Making Effective Use of Land”.</p>

	<p>Criterion 2b should be amended to ensure it is consistent with STRAT5 of the Local Plan and therefore meet the Basic Conditions.</p>
<p>Landscaped green corridors and noise mitigation measures shall be provided along the edges of the development areas, including screening to the A418.</p>	<p>The noise modelling undertaken in respect of the current applications has shown noise can be mitigated through measures such as suitable glazing and layout features.</p> <p>The bund proposed will buffer Phase 3 from the A418 and will provide a landscaped green feature.</p>
<p>The development should minimise the impact of views along the Cuttle Brook looking north from Oxford Road and from the A418, minimising the impact on the landscape to the north of the site. The Cuttle Brook Corridor itself shall also be protected in line with Policy NEC1.</p>	<p>In response to earlier representations at the Regulation 14 Plan appropriate boundaries of the development parcel have been established. This is shown on the attached plan.</p> <p>As set out above, the concept masterplans should be deleted from the TNP2 document. The Masterplanning Report is referred to in the policies and therefore having extracts from that document serves no purpose.</p> <p>If they are retained then the concept masterplan for land off Oxford Road should be updated to reflect the latest masterplanning work undertaken to inform the planning application.</p>
<p>The layout, scale and massing of development shall seek to avoid harm to the Conservation Area and listed buildings within close proximity to the site, with development set back from the cluster of listed farm buildings and allowing for retention of views to these from the permissive footpath to the east.</p>	<p>As above the amended scheme has the support of the SODC Council's Conservation Officer.</p> <p>The TNP2 should be amended as suggested in relation to the Cuttle Brook corridor.</p>
<p>There should be no net loss in the quantum of open space across the allocation. Where possible, land provided as open space for the Thame Meadows development shall be retained and integrated into the network of green infrastructure to be provided as part of new development.</p>	<p>As our clients have control over the entirety of the Site Allocation Area this criterion can be met. The existing network of permissive footpaths will be retained alongside the proposed development and expanded into new areas.</p> <p>The development will allow the public to use a much greater area of open space than is currently possible. Public access across the current open space areas is limited to permissive paths only (as controlled in a S106 Agreement). The overall quantum of <u>publicly accessible</u> open space will be increased significantly relative to the current situation.</p> <p>As such criterion F should acknowledge that current access is via a network of permissive paths only.</p>
<p>New areas of publicly open space, of at least equal size and quality to any existing open space lost as a result of development, must be provided in an</p>	<p>The current application demonstrates how this can be achieved with each Phase benefiting from an area of managed open space immediately adjacent</p>

<p>equally accessible location as part of the development. Where land is to be provided as open space this should not be located where users would be subject to unacceptable noise levels.</p>	<p>to the built form of a “like for like” size to the developable area of each Phase. This provides a major benefit over the current situation which is limited to defined permissive paths.</p> <p>These areas will be equipped and managed in a similar manner to the current arrangements for Thame Meadows. These areas will not experience any undue noise disturbance.</p>
<p>An area of parkland shall be provided within the flood plain. Liaison with the Environment Agency during the application process will be required to assess the need for sequential and exception tests to be undertaken. This shall include wetland areas with paths through this that are designed to enable access in all conditions.</p>	<p>Noted. Paths designed to be accessed in all conditions may not be sensible, for example if land is in flood it would not be appropriate to encourage access due to health and safety reasons. This should be amended accordingly.</p>
<p>Land subject to archaeological interest shall be retained as open space.</p>	<p>This should be amended to also refer to be being retained as either agricultural land and/or open space.</p>
<p>Walking and wheeling routes shall be provided that connect development with the surrounding open space and footpath network, including those along the Cuttle Brook, and along Oxford Road providing connections to the town centre.</p>	<p>– The current application will provide links to Oxford Road to complement the Town Council proposal for an all-weather footpath through Rycote Meadow towards Oxford Road (Planning Ref: P24/S1463/LDP)</p>
<p>Vehicular access shall be via the existing network of streets in the Thame Meadows development.</p>	<p>This is proposed in current application</p>
<p>Streets within areas of development shall incorporate tree planting.</p>	<p>This is proposed in current application</p>
<p>Existing trees and hedgerows shall be retained where possible, and biodiversity net gain delivered on the site.</p>	<p>Where the removal of any existing features is unavoidable, replacement planting will be offered within the relevant phase</p> <p>A dedicated new habitat offering at least policy compliant levels of biodiversity net gain will be delivered on site and will benefit from a long-term management regime. However, the policy should reflect the ability to deliver biodiversity net gain off-site if it is not possible to meet the full criteria on site. This would align with the policies in the Local Plan and therefore meet the Basic Conditions. The current wording is more restrictive.</p>

The Oxford Road Concept Plan

Our main concern is the inclusion of the concept masterplans in the TNP2 document and the varying scales and level of detail on the various other plans. There are also a number of inconsistencies with the plans as will be discussed below.

The concept masterplans are noted as being indicative and illustrative through criterion 11 of policy GDH1 that states that “*proposals for development of the allocated sites are expected to accord with the principles established in the Thame Masterplanning Report.*”

The TNP2 allocates the land within the red line, for example in Figure 14 for land at Oxford Road. However the concept masterplans are illustrative. For example, the introduction to the Masterplanning Report (paragraph 1.1) clearly states “*..these design concepts are high level and illustrative, prepared to demonstrate how the design principles that the Neighbourhood Forum wishes to promote could be applied on the sites. We [AECOM] have not undertaken technical studies on topics such as ecology, ground conditions, traffic or drainage. It is expected that full co-design exercise are undertaken by the applicants on the sites. This report is just a step in that direction, enabling stakeholders to progress from an informed position.*”

It is not clear what the “Principles” are, especially in relation to the concept masterplan and boundaries of the parcels. For example the eastern boundary of the eastern parcel is shown to stop short of a “view” shown on the Concept Plan. It does not appear the importance and position of this view has been informed by any landscape appraisal based on Verified Views. Our Client’s application has been informed by a full Landscape and Visual Appraisal (LVIA) that shows how development can come further eastwards. This development edge has been verbally agreed with the Landscape officer at SODC.

The definition of Principles should be clarified to avoid any issues around interpretation.

Given the above, the additional, smaller red lines on the concept plans are confusing and it would be best to remove the concept plans from the TNP2 document and rely on the Masterplanning document. In addition, for the land off Oxford Road, the extensive technical work and discussions with the local planning authority has moved the masterplanning process on. There are clear discrepancies which would be best aligned. For example, the view cone from the Oxford Road is shown to reduce the development parcel to a much greater degree than the technical studies prove. Given this there is an increased ability to accommodate development on the site, whilst meeting the “principles set out in the Masterplanning Report. We would recommend that the two should align.

The Plan (at Figure 15) and the Thame Master planning Report (at Figure 70) are also slightly different and we suggest that if the concept plan is retained in the TNP2 that the same plan is used in both reports to avoid any issues around interpretation arising.

Separately, Figure 70 refers to Phase 3 as “Site West” whilst it is named “Site Northwest” in Figure 15. The labelling should be made consistent to avoid confusion.

Suggested Action
<ol style="list-style-type: none"> 1. Delete the concept masterplans from the TNP2 document. 2. Clarify in the TNP2 and/or in the Masterplan Report what the “Principles” are and that the boundaries of parcels on the concept masterplans are not fixed. 3. Amend the concept masterplan for land off Oxford Road to better align with the emerging planning application scheme which has been informed by detailed technical assessment work and is verbally agreed with SODC technical officers.

The Remainder of the TNP2

GDH2 – Housing Type, Tenure and Mix

The housing mix requirements in Policy GDH2 are supported as they reflect the conclusions of a relatively up to date Housing Needs Assessment (HNA) dating from March 2022 that reflects housing trends in Thame. As

the Oxford Road development has come forward as a single application, it is important that the proposed market housing mix is assessed in totality rather than this policy’s requirement being applied to an individual phase.

The requirement for First Homes at 50% discount will have a significant impact on the viability of the affordable housing as a whole and therefore the ability to deliver other affordable housing products particularly affordable rent which is identified as a key objective. As such a degree of flexibility should be built in to the policy to account for viability issues.

Furthermore, it is important that site context is taken into account. Given the Oxford’s Road’s edge of town location, larger family housing is more appropriate and should be provided in a greater proportion.

GDV1 – Visitor Economy

The wording in Policy GDV1 criterion 2 should be amended to make it clear that it is only where new build development is for visitor economy related uses. As currently written this would apply to all development. Revised wording suggested below:

Suggested Action
<p>1. Amend GDV1 criterion 2 to read:</p> <p>“Applicants Applications for new build tourist/visitor related development will be required to demonstrate that:.....”</p>

CPQ1 – Design in Response to Local Character

The design criteria in Policy CPQ1 are reasonable. As discussed above, the density of the immediate surroundings to a development site (criterion k) is a useful starting point but local and national requirements to ensure an efficient use of land must also be considered to ensure the policy meets the Basic Conditions.

CPQ5 – Sustainable Design and Construction

This policy should align with the policies in the Local Plan. It is important that, in applying this policy, Building Regulation requirements are borne in mind along with the Written Ministerial Statement in relation to duplicating policy requirements. Building Regulations may eventually supersede these policy criteria. As currently drafted it is questioned if it meets the Basic Conditions.

CPQ6 – Street Hierarchy

This Policy offers quite specific design guidance that our Clients consider would be best incorporated into Section 5 of the Design Code rather than be provided as an individual policy in the main document.

CPQ7 – Parking in Residential Areas

Policy CPQ7 offers very detailed requirements on residential parking which is best provided as a part of the Design Code, with illustrations. As drafted, the policy is excessively wordy and difficult to follow.

Existing Open Space/SF02

Figure 26 sets out important areas of open space to be protected and retained under policy SF02. Our Clients are very concerned by this plan for the following reasons:

- In relation to the site at Oxford Road the south-western parcel of open space (see extract below) will remain open but will be retained as agricultural land but with permissive paths around it. The policy and plan do not differentiate between open space and agricultural land which could lead to confusion ie the plan gives the impression of public access to the areas which is not going to be the case for all of the land.



Extract from Fig 26 in TNP2 showing open space at Oxford Road site

- The north-eastern parcel is strongly defined and leaves no flexibility to respond to the points raised above in relation to the eastern boundary of the parcels. To reiterate, the concept masterplan is not based on any technical assessment work and can only be treated as an indicative line at this stage. The way around this would be to use the boundary in the extant planning application to define the parcels and then update figure 26 accordingly.
- In addition, where open space is re-provided it could offer greater functionality/public access and therefore could be a smaller area of land if providing such greater benefit.

Policy SF02 should be amended as below:

Suggested Action

1. Amend SF02 to read:
 “4. Land defined as ‘important green spaces’, ‘other amenity green spaces’, or ‘sports pitches’ on Figure 26 should be protected and retained in line with NPPF’s guidance on open spaces, **unless:**
 2. i. ~~Proposals that result in the loss of open space as defined in Clause 4~~ **it is** must be replaced with open space of equal size, similar or higher quality, **the same or greater functionality/public access** and where it is accessible to and in reasonable journey times to the community....

NEB1 – Biodiversity

There is a contradiction in the policy - criteria 1 refers to the SODC mitigation hierarchy which allows for off-site provision if it has first been demonstrated that on-site provision is not possible. However the policy requires

a minimum of 10% “on-site”. Criteria 2 then refers to provision off-site where this is not possible. The wording of the policy could be made clearer.

NEC1 – The Cuttlebrook Corridor

Figure 28 in the TNP2 defines the extent of the Cuttle Brook Nature Reserve and Wider Cuttle Brook Corridor. To the north of Oxford Road, the wider corridor is crudely defined (the line is circa 50 m wide) and does not relate to any particular features on the ground (see extract below). If the plan is to be used in assessing proposals it should be to a smaller scale and the boundary line justified in relation to on-site features.

This is a common theme for a number of the plans in the TNP2 that are of varying scales and levels of precision.



Extract from Figure 28 – Cuttle Brook Corridor

GAP1: The Phoenix Trail

Figures 31, 33 and 34 under the above policy include a green arrow that implies open space. These are in conflict with the site allocation policy GDH1d and should be amended accordingly. A suitably worded key should also be provided to define what the green corridor is suggesting.

Conclusion

Generally the TNP2 is supported. However, there are several elements of the plan that need to be amended to ensure the Basic Conditions are met. The site off Oxford Road is at an advanced stage of a full planning application and detailed technical reports have informed the layout of the proposals. This work can be utilised to better inform the various plans and figures in the TNP2 document to ensure it is robust and makes effective use of land in line with the requirements in the Local Plan and NPPF.

We trust that the above provides a useful contribution to the process, however, should you have any points of clarification or require any further details please do not hesitate to contact me at the above address. Through the submission of this representation our clients request that a hearing session is needed to ensure the above issues are adequately understood and we therefore request the opportunity to appear at any public hearing held as part of the Examination of TNP2.

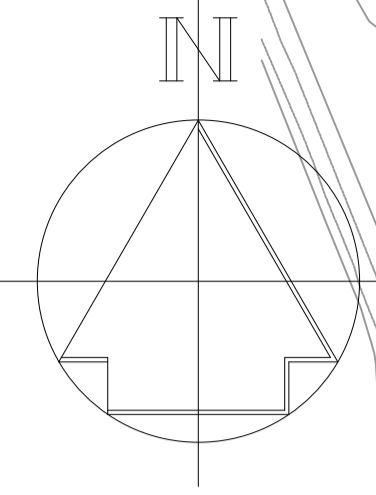
Yours faithfully



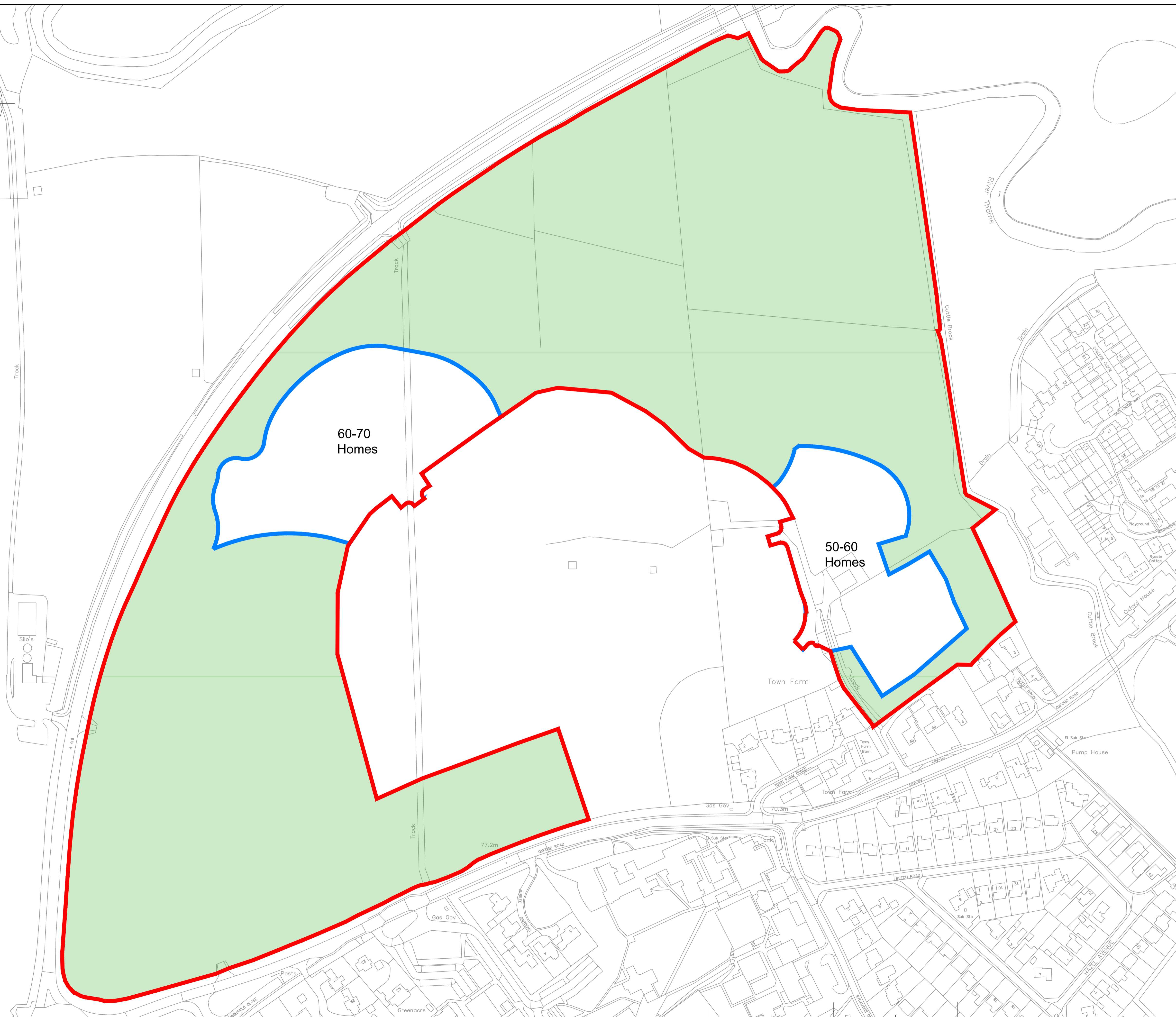
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Enc



- Key:**
- Allocation Boundary
 - Indicative Development Cells
 - Green Infrastructure



***For illustrative purposes only**

Revision:	
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Job:	OXFORD ROAD THAME
Title:	
Scale:	NTS@A1
Date:	19.07.24
Drawn:	HB
Checked:	DJ

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Response 36: ID ANON-MT75-C633-C

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 21:08:39

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Organisation (if relevant):

DSUK

Organisation representing (if relevant):

Petition of 1372 people

Address line 1:

████████████████████

Address line 2:

Address line 3:

Postal town:

Thame

Post code:

██████████

Telephone number:

Email:

██

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please see below the petition signed by 1392 people (Signatures are attached) who object to the building of the proposed new houses North of Oxford Road., on the 'designated open space' next to the current Thame Meadows housing estate

Note the current made NP states this area should remain undeveloped as open green space as does the the the current legal agreements between the District Council and the landowner/ builder.

This petition was submitted to TTC months prior to submission of this NP but has been completely ignored in all submitted material.

Further there has been a live planning permission for this land, which TTC told people to reply to (265 people objected) and TTC have again completely ignored this information even though the deadline was 5 months ago. This included responses by 3 other local Parish Councils, The River Thame Conservation Society, Oxfordshire CPRE and more

This also included objections by the Ecology Officer, the Landscape architect, Forestry officer and more, most comments of which have been ignored. Further the Environment agency responded stating the LPA should complete a sequential flood risk assessment again something not considered by TTC, when notably no other site proposed had any flood risk. P23/S4262/FUL

As a minimum the District Council needs to consider all responses to this planning application as direct objections to this plan and the 1392 people that

have directly objected to the development of this area.

This level of objection far outweighs any support identified by TTC, particularly as the supporting material for the first two consultations, still stated this area should remain undeveloped. The most recent consultation had such little engagement the responses to this petition outweigh the support for this site over 25 fold and the objections to the site recorded on the District Council website 5 fold.

It is the responsibility of Thame Town Council to work with other members of the community who are interested in, or affected by, the neighbourhood planning proposals to allow them to play an active role in preparing a neighbourhood plan (Government guidance on NP), and by ignoring this community and not engaging with locals around this development North of Oxford Road TTC have failed to do this. Further TTC have outwardly rejected offers to help from engaged locals, which is against both theirs and government guidance.

In summary TTC have submitted a plan which does not recognise significant local objection, to develop on land they do not have the authority or public support to supersede live restrictive planning permissions on.

<https://chng.it/bLJTT6QgfC>

Save Thame's Open Space and flood plain from development

Started

11 January 2024

Petition to

South Oxfordshire District Council and Thame Town Council

Why this petition matters

We the undersigned petition to Protect Thame's green accessible space and stop the building of new houses on a flood plain. As current residents of Thame, Oxfordshire, or the nearby communities, we object to the building of the proposed new houses on the area north west of Thame, on the 'designated open space' next to the current Thame Meadows housing estate for the reasons below;

The area proposed is a flood plain. The current flood risk assessment suggests that the 100 year +31% line is below the line of houses. However pictures from flooding just 2 weeks ago overlaid on this line, suggest the water is already reaching these proposed houses before they are even built. This throws significant concerns over the accuracy of the model used, not to mention the potential impact of this and other developments of increased flooding of houses and gardens here and elsewhere along the river. (See submitted flood risk vs actual flood levels pictures below)

Water and Sewerage will be supplied and dealt with by Thames Water, whom are already struggling to provide water to the town, and whom during recent flooding pumped raw sewerage into the local river for over 50 hours. There have also been multiple sewerage spills over roads and into gardens in the current Thame Meadows estate, so the system is clearly not able to support the current system let alone 150+ more.

Thame's current amenities are at breaking point, schools are already oversubscribed, Doctor's surgery's are struggling with the demand and getting an NHS Dentist is near impossible. With another approximately 150+ houses where will the extra schools, Doctor's and Dentist's come from?

The current neighbourhood plan specifically states this area should not be developed and left as open space. We suggest instead it be used to extend the Cuttlebrook Nature Reserve, which the Town Council have currently asked us to stop using because it is so over-utilised!

The area to be built on is designated 'accessible open space'. A legal agreement between the developer and the District Council was put in place to prevent development on this open space when the current Thame Meadows Estate was built! This agreement should be enforced to protect the small amount of green space Thame has left.

The current open space provides homes and green space to an array of wildlife species. The current plans also destroy multiple historic hedgerows which house, feed and protect these species including kingfishers, woodpeckers, hedgehogs, fieldfare, water voles, grass snakes, deer, otters, Great Egrets, Little Egrets and many other types of birds, and possibly even great crested newts.

The proposed houses would have a significant negative impact on views from Oxford Road blocking Historic Thame's only view to the neighbouring countryside would be lost forever. As well as destroying the last known ridge and furrow field in this area.

The density and scale of the housing plans far exceed that of the current estate and is in direct conflict with the current Thame Neighbourhood Plan and in protecting the feeling of Historic Thame.

No green space is found separating the current development from the new development in significant areas of the proposed plan. This is in direct conflict with the Thame Neighbourhood Plan, other information the developer submitted, and not in keeping with all previous new developments in Thame. The large number of proposed houses and no plans for an extra access road, also means a huge and unacceptable increase in volume of traffic down Roman Way, Mercian Way, Weavers Branch and Causeway close. The roads are already affected by poor layout, lack of traffic calming and drop off/collections from Lord Williams School. Residents have seen many accidents on the access roads which do not appear to be in the date, and also many near misses. Doubling the houses will double these risks, especially given the speeds that people drive down these roads at already. It will also inevitably put up car emissions, create poorer air quality in more densely populated area.

The current builder also still hasn't finished a long list of outstanding obligations to the current residents, and allowing them to build more when they haven't even finished the last one with terrible finishes to certain things, for example the playground - which the local children cannot use due to the poor surface meaning the place is a giant litter tray, putting them at risk of disease playing there stepping and falling in it frequently.

In conclusion, Thame already suffers from a scarcity of green spaces. This particular area was designated as open Space, not to be developed as part of the Thame Neighbourhood Plan and current planning permission. This was to give us much needed respite, connection with nature and to play a crucial role in preventing flooding in other parts of our town and surrounding villages.

The loss of this green space would be catastrophic for residents and local flora and fauna. It means fewer places to enjoy outdoor activities and less habitat for these animals which are already under threat due to urbanisation. Please note this area should already be publicly accessible, which the developer has still not delivered on.

We believe that it is essential that planning permissions are respected and enforced to protect such valuable spaces from being lost forever, and urge the relevant authorities to take action against this proposal which is in direct conflict to their own planning permissions (section 106 agreement)

If new houses cannot be avoided we urge you to consider other sites that are not on a flood plain, don't destroy this rich and diverse area of open space that could easily extend our nature reserve, which is already overused, and can accommodate some of the already needed amenities including schools, nurseries and doctors.

Please join us in preserving the future of Thame by signing this petition today! Let's stand together against this development and protect our precious open spaces for generations to come.

You can upload supporting evidence here:
petition_signatures_jobs_37829899_20240724163157.csv was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

The 1392 people should be directly recorded as objections to this development North of Oxford Road.

The 265 objections recorded to the planning permission should also be directly considered. Including those by relevant bodies.

Other sites should be considered before this for development as per sequential flood tests. Small surveys (two of which still stated this area should remain undeveloped) are not significant enough to outweigh the level of objection described above to remove restrictive planning permission, designed to protect from development.

If any development was to go ahead on this site the minimum requirement would be:

Engage with a local working group to come to a solution
All hedges to be retained
Scale to be reduced significantly
Green Space separating the new estate to the former estate
Green space incorporated into the development and play parks on both aspects
Cycle path/disabled access connecting the estate parts
Protections on development of the area to be retained as open green space
Further green space provided for the new houses being built rather than the same quantum
Moved further away from the flood zone and ring road

Many of these comments are covered by the landscape architect and it is incredibly concerning to see these have been ignored in this submission, when these have been live for months.

'Whilst some development within the site may be acceptable, the level of development proposed does not allow adequate space for landscape mitigation'

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=2382326510&CODE=F6B051A8C8F63C62EFE0DFE4BEEBF687

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Yes, I would like to be notified

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

A public hearing should occur as by submitting this plan Thame Town Council have failed to follow Government Guidance and their own guidance on Neighbourhood Planning.

'it should work with other members of the community who are interested in, or affected by, the neighbourhood planning proposals to allow them to play an active role in preparing a neighbourhood plan or Order'

TTC have failed to engage with any interested party with regards to area North of Oxford Road, specifically stating it would delay the process to get working groups or local interested individuals involved. This is against the Government guidance above and the internal guidance for TTC

TTC have failed to include other relevant information in their submission notably the objections of 1392 people and 265 people on the planning portal and the objections of other relevant bodies

TTC have failed to acknowledge the planning permission changes associated with this site and are proposing it ahead of any required sequential planning tests.

<https://www.gov.uk/guidance/neighbourhood-planning--2>

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

I would say this has been very disappointingly shared and I would expect continued low engagement

Name	City	State	Postal Code	Country	Signed On
[REDACTED]	Cardiff	Wales; Cymru		UK	11/01/2024
[REDACTED]	Thame	England	[REDACTED]	UK	14/01/2024
[REDACTED]	Thame		[REDACTED]	UK	15/01/2024
[REDACTED]	Thame	England	[REDACTED]	UK	22/01/2024
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[REDACTED]	Wandsworth	England	[REDACTED]	UK	22/01/2024
[REDACTED]	Thame		[REDACTED]	UK	22/01/2024
[REDACTED]	Oxford	England	[REDACTED]	UK	22/01/2024
[REDACTED]	Shabbington	England	[REDACTED]	UK	22/01/2024
[REDACTED]	Haddenham	England	[REDACTED]	UK	22/01/2024
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[REDACTED]	Ludlow		[REDACTED]	UK	22/01/2024
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Thame		UK	23/01/2024
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Thame		UK	23/01/2024
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Thame		UK	23/01/2024
Reading		UK	23/01/2024
Shipston on Stour	England	UK	23/01/2024
Thame	England	UK	23/01/2024
Thame	England	UK	23/01/2024
Mill Hill		UK	23/01/2024
Thame	England	UK	23/01/2024
Tavistock		UK	23/01/2024
Yateley	England	UK	23/01/2024
Thame		UK	23/01/2024
Thame	England	UK	23/01/2024
Derby	England	UK	23/01/2024
Keighley	England	UK	23/01/2024
Cheltenham	England	UK	23/01/2024
Hailsham		UK	23/01/2024
Thame	England	UK	23/01/2024
Reading		UK	23/01/2024
Thame, South Oxford	England	UK	23/01/2024
York	England	UK	23/01/2024
Aylesbury	England	UK	23/01/2024
Croydon		UK	23/01/2024
Thame		UK	23/01/2024
cornwall. isles of scilly		UK	23/01/2024
Yeovil		UK	23/01/2024
Thame		UK	23/01/2024
Hackney		UK	23/01/2024
Leamington Spa	England	UK	23/01/2024
Thame		UK	23/01/2024
Wokingham	England	UK	23/01/2024
Wembley		UK	23/01/2024
Sevenoaks		UK	23/01/2024
Thame		UK	23/01/2024
Thame		UK	23/01/2024
Haddenham	England	UK	23/01/2024
Thame		UK	23/01/2024
Thame	England	UK	23/01/2024
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THAME	England	UK	23/01/2024
Stamford	England	UK	23/01/2024
Wokingham	England	UK	23/01/2024
Thame	England	UK	23/01/2024
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Thame		UK	24/01/2024
London		UK	24/01/2024
		Czech Rept	24/01/2024
Kendal		UK	24/01/2024
Bolton		UK	24/01/2024
Thame		UK	24/01/2024
Thame	England	UK	24/01/2024
Winchester		UK	24/01/2024

Horsham	England	UK	24/01/2024
Crawley	England	UK	24/01/2024
Thame	England	UK	24/01/2024
Hampstead		UK	24/01/2024
Crowthorne	England	UK	24/01/2024
Saint Cleer		UK	24/01/2024
Newquay		UK	24/01/2024
Thame		UK	24/01/2024
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Milton Keynes	England	UK	24/01/2024
Haywards Heath	England	UK	24/01/2024
Thame	England	UK	24/01/2024
Islington		UK	24/01/2024
Bristol		UK	24/01/2024
Bolton		UK	24/01/2024
Thame	England	UK	24/01/2024
Dwyran	Wales; Cymru	UK	24/01/2024
Bridgwater		UK	24/01/2024
Reading		UK	24/01/2024
Tower Hamlets	England	UK	24/01/2024
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Liskeard		UK	24/01/2024
Thame		UK	24/01/2024
Stoke-on-Trent		UK	24/01/2024
Milton Keynes	England	UK	24/01/2024
Thame		UK	24/01/2024
Ibiza Town		Spain	24/01/2024
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Catterick		UK	24/01/2024
London		UK	24/01/2024
Haddenham	England	UK	24/01/2024
Thame		UK	24/01/2024
Ickford	England	UK	24/01/2024
Londonderry		UK	24/01/2024
London		UK	25/01/2024
Worminghall	England	UK	25/01/2024
Aylesbury	England	UK	25/01/2024
Wallington		UK	25/01/2024
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Birmingham	England	UK	25/01/2024
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Reading		UK	25/01/2024
Thame		UK	25/01/2024
Marlow		UK	25/01/2024
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City of Westminster		UK	25/01/2024
Marlow		UK	25/01/2024
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Peterborough		UK	25/01/2024
sutton		UK	25/01/2024
Bourne End		UK	25/01/2024
Thame		UK	25/01/2024
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Thame		Cape Verde	25/01/2024

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Victoria		UK	25/01/2024
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Thame	England	UK	25/01/2024
Thame		UK	25/01/2024
Hackney		UK	25/01/2024
Hackney		UK	25/01/2024
Swindon		UK	25/01/2024
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Beaconsfield		UK	25/01/2024
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Thame		UK	26/01/2024
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Thame		UK	26/01/2024
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Towersey	England	UK	26/01/2024
Aix-en-Provence		France	26/01/2024
Hackney		UK	26/01/2024
Thame		UK	26/01/2024
Amersham		UK	26/01/2024
Chinnor	England	UK	26/01/2024
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Haddenham	England	UK	26/01/2024
Thame		UK	26/01/2024
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Oxford		UK	26/01/2024

Thame		UK	26/01/2024
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Brackley	England	UK	26/01/2024
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Thame		UK	26/01/2024
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Beaconsfield		UK	26/01/2024
Newcastle Upon Tyne		UK	26/01/2024
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Oxford	England	UK	26/01/2024
Thame	England	UK	26/01/2024
Thame		UK	26/01/2024
Ipswich		UK	26/01/2024
Hornsey		UK	26/01/2024
Gulfport	Florida	US	26/01/2024
Thame		UK	26/01/2024
Reading		UK	26/01/2024
Wickford		UK	26/01/2024
Thame		UK	26/01/2024
Thame		UK	26/01/2024
Thame		UK	26/01/2024
Long Crendon	England	UK	26/01/2024
Thame		UK	26/01/2024
Thame	England	UK	26/01/2024
Cramlington		UK	26/01/2024
Chesham		New Zealar	26/01/2024
Milton Keynes	England	UK	26/01/2024
Chinnor	England	UK	26/01/2024
Wokingham	England	UK	26/01/2024
London		UK	26/01/2024
Crawley		UK	26/01/2024
Thame		UK	26/01/2024
Portsmouth		UK	26/01/2024
Trowbridge	England	UK	26/01/2024
Thame		UK	26/01/2024
Thame		UK	26/01/2024
Thame	England	UK	26/01/2024
Oxford		UK	26/01/2024
Marlborough		UK	26/01/2024
Thame	England	UK	26/01/2024
Thame	England	UK	27/01/2024
Liverpool		UK	27/01/2024
Thame		UK	27/01/2024
San Francisco	California	US	27/01/2024
Chinnor	England	UK	27/01/2024
Thame		UK	27/01/2024
Minsterworth		UK	27/01/2024
Beaconsfield		UK	27/01/2024
Thame		Ireland	27/01/2024
		New Zealar	27/01/2024
Manchester		UK	27/01/2024
Chinnor	England	UK	27/01/2024

Thame		UK	27/01/2024
Aylesbury	England	UK	27/01/2024
Thame		UK	27/01/2024
Northampton		UK	27/01/2024
Thame		UK	27/01/2024
West Malling		UK	27/01/2024
Thame		UK	27/01/2024
Thame		UK	27/01/2024
Thame		UK	27/01/2024
Bletchley		UK	27/01/2024
Witney	England	UK	27/01/2024
Thame	England	UK	27/01/2024
Thame	England	UK	27/01/2024
Long Crendon	England	UK	27/01/2024
Colchester		UK	27/01/2024
Thame, Oxford	England	UK	27/01/2024
Winscombe	England	UK	27/01/2024
Fulham	England	UK	27/01/2024
Ipswich		UK	27/01/2024
Beaconsfield		UK	27/01/2024
Hackney		UK	27/01/2024
Thame		UK	27/01/2024
Hackney		UK	27/01/2024
Thame		UK	27/01/2024
redditch		UK	27/01/2024
Thame		UK	27/01/2024
Thame		UK	27/01/2024
Thame		UK	27/01/2024
London	England	UK	27/01/2024
Thame	England	UK	27/01/2024
Thame		UK	27/01/2024
Newport	Wales; Cymru	UK	27/01/2024
Oxford		UK	27/01/2024
Thame	England	UK	27/01/2024
shetland		UK	27/01/2024
Thame		UK	27/01/2024
Broadstairs	England	UK	27/01/2024
Long Crendon	England	UK	27/01/2024
Islington		UK	27/01/2024
Brill	England	UK	27/01/2024
Long Crendon	England	UK	27/01/2024
Stroud		UK	27/01/2024
Manchester		UK	27/01/2024
Reading		UK	27/01/2024
Haddenham	England	UK	27/01/2024
Thame	England	UK	27/01/2024
London		UK	27/01/2024
Reading		UK	28/01/2024
Thame		UK	28/01/2024
Rotherham		UK	28/01/2024
Thame	England	UK	28/01/2024
Thame		UK	28/01/2024
Thame		UK	28/01/2024
London		UK	28/01/2024
Thame		UK	28/01/2024
Leeds		UK	28/01/2024
Bicester	England	UK	28/01/2024
Thame		UK	28/01/2024
Abingdon	England	UK	28/01/2024
Thame		UK	28/01/2024

Thame		UK	28/01/2024
Thame		UK	28/01/2024
Witney	England	UK	28/01/2024
Reading		UK	28/01/2024
Thame		UK	28/01/2024
Oxford		UK	28/01/2024
Thame	England	UK	28/01/2024
Forest Hill	England	UK	28/01/2024
Cardiff		UK	28/01/2024
Abingdon	England	UK	28/01/2024
Thame		UK	28/01/2024
Thame		UK	28/01/2024
Oxford	England	UK	28/01/2024
Old Stratford	England	UK	28/01/2024
Towersey	England	UK	28/01/2024
Reading		UK	28/01/2024
Plymouth	England	UK	28/01/2024
Thame		UK	28/01/2024
Banbury		UK	28/01/2024
Shipston on Stour	England	UK	28/01/2024
Thame		UK	28/01/2024
London	England	UK	28/01/2024
Thame		UK	28/01/2024
Thame		UK	28/01/2024
Thame		UK	28/01/2024
Ickford	England	UK	28/01/2024
Bicester	England	UK	28/01/2024
Buckingham	England	UK	28/01/2024
Thame		UK	28/01/2024
Great Missenden	England	UK	28/01/2024
Hexham	England	UK	28/01/2024
Thame		UK	28/01/2024
Thame		UK	28/01/2024
Long Crendon	England	UK	28/01/2024
Thame		UK	28/01/2024
Oxford		UK	28/01/2024
Thame		UK	28/01/2024
Whiteshill		UK	28/01/2024
Northampton		UK	28/01/2024
Keighley		UK	28/01/2024
Crawley	England	UK	28/01/2024
Thame		UK	28/01/2024
Thame		UK	28/01/2024
Banbury	England	UK	28/01/2024
Witney	England	UK	28/01/2024
Preston		UK	28/01/2024
Thame	England	UK	28/01/2024
Oxford		UK	28/01/2024
Brisbane		Australia	28/01/2024
London		UK	29/01/2024
Andover	England	UK	29/01/2024
Thame		UK	29/01/2024
Aylesbury	England	UK	29/01/2024
Beaconsfield		UK	29/01/2024
Wantage	England	UK	29/01/2024
		Netherland	29/01/2024
Thame	England	UK	29/01/2024
Reading		UK	29/01/2024
Thame	England	UK	29/01/2024
Cambridge		Portugal	29/01/2024

Thame	England	UK	29/01/2024
Tipton		UK	29/01/2024
Thame		UK	29/01/2024
london		UK	29/01/2024
		UK	29/01/2024
Kilmarnock		UK	29/01/2024
Witney	England	UK	29/01/2024
Sutton Coldfield		UK	29/01/2024
LONDON		UK	29/01/2024
Wednesbury	England	UK	29/01/2024
Swansea		UK	29/01/2024
Wallasey	England	UK	29/01/2024
		UK	29/01/2024
Birmingham		UK	29/01/2024
Wallingford	England	UK	29/01/2024
Milton Keynes		UK	29/01/2024
Thame		UK	29/01/2024
Egham	England	UK	29/01/2024
Manchester		UK	29/01/2024
Thame		UK	29/01/2024
Bolton		UK	29/01/2024
Winnersh	England	UK	29/01/2024
Thame	England	UK	29/01/2024
london		UK	29/01/2024
Aylesbury	England	UK	29/01/2024
Stokenchurch	England	UK	30/01/2024
		UK	30/01/2024
London		UK	30/01/2024
Oxford	England	UK	30/01/2024
Lambeth		UK	30/01/2024
London	England	UK	30/01/2024
Towcester	England	UK	30/01/2024
Thame		UK	30/01/2024
London		UK	30/01/2024
		UK	30/01/2024
Thame		UK	30/01/2024
Bletchington		UK	30/01/2024
Barnoldswick	England	UK	30/01/2024
Luton		UK	30/01/2024
Hemel Hempstead		UK	30/01/2024
CAMBRIDGE		UK	30/01/2024
Redcar		UK	30/01/2024
thame	England	UK	30/01/2024
Thame		UK	30/01/2024
Hackbridge	England	UK	30/01/2024
Thame		UK	30/01/2024
woking	England	UK	30/01/2024
Cambridge		UK	30/01/2024
Thame		UK	30/01/2024
Norwich		UK	30/01/2024
Thame		UK	30/01/2024
		Netherland	30/01/2024
Thame		UK	30/01/2024
Oxford	England	UK	30/01/2024
Woodstock	England	UK	30/01/2024
Bloxham, Nr Banbury	England	UK	30/01/2024
London	England	UK	30/01/2024
Thame	England	UK	30/01/2024
Moreton in Marsh	England	UK	30/01/2024
wellingborough	England	UK	30/01/2024

London		UK	30/01/2024
Thame		UK	30/01/2024
Thame		UK	30/01/2024
Epsom	England	UK	30/01/2024
London		UK	30/01/2024
Oxford	England	UK	30/01/2024
Stroud		UK	30/01/2024
Marlow		UK	30/01/2024
Yateley		UK	30/01/2024
Thame	England	UK	31/01/2024
Edinburgh		UK	31/01/2024
Thame		UK	31/01/2024
Thame	England	UK	31/01/2024
Witney	England	UK	31/01/2024
Bicester		UK	31/01/2024
Crowthorne	England	UK	31/01/2024
Thame	England	UK	31/01/2024
Newbury		UK	31/01/2024
Thame	England	UK	31/01/2024
Haddenham	England	UK	31/01/2024
Blackwood		UK	31/01/2024
Dudley		UK	31/01/2024
Oxford		UK	31/01/2024
Wallington	England	UK	31/01/2024
Soignies		Belgium	31/01/2024
Ceredigion		UK	31/01/2024
Thame		UK	31/01/2024
Aylesbury	England	UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Hackney		UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Crowthorne	England	UK	31/01/2024
Thame	England	UK	31/01/2024
Rainhill		UK	31/01/2024
Wokingham	England	UK	31/01/2024
Thame	England	UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Southwark	England	UK	31/01/2024
Thame		UK	31/01/2024
Thame	England	UK	31/01/2024
Enfield		UK	31/01/2024
Thame		UK	31/01/2024
Southend-on-Sea		UK	31/01/2024
Banbury	England	UK	31/01/2024
Sutton		UK	31/01/2024
Manchester		UK	31/01/2024
Reading		UK	31/01/2024
Thame		UK	31/01/2024
Thame	England	UK	31/01/2024
Thame	England	UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Rhyl	Wales; Cymru	UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Snarestone	England	UK	31/01/2024

Birmingham	England	UK	31/01/2024
Thame	England	UK	31/01/2024
City of Westminster		UK	31/01/2024
London		UK	31/01/2024
Blackburn		UK	31/01/2024
Coventry		UK	31/01/2024
Chigwell		UK	31/01/2024
Long Crendon	England	UK	31/01/2024
Matlock		UK	31/01/2024
Harrow		UK	31/01/2024
Oxford		UK	31/01/2024
Thame	England	UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Thame	England	UK	31/01/2024
Castelmayran		France	31/01/2024
Oxford		UK	31/01/2024
Chinnor	England	UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
Thame		UK	31/01/2024
New Malden		UK	31/01/2024
Milton Keynes		UK	31/01/2024
Sutton	England	UK	31/01/2024
Thame		UK	31/01/2024
Reading		UK	31/01/2024
Swindon		UK	31/01/2024
Sandhurst	England	UK	31/01/2024
Thame		UK	31/01/2024
London		UK	31/01/2024
Broadstone		UK	31/01/2024
Thame		UK	31/01/2024
Bradford		UK	31/01/2024
Lytham st Anne's Lancashire		UK	01/02/2024
Aston Rowant	England	UK	01/02/2024
Thame	England	UK	01/02/2024
Thame		UK	01/02/2024
Thame		UK	01/02/2024
Solihull	England	UK	01/02/2024
Thame		UK	01/02/2024
Thame		UK	01/02/2024
Wokingham	England	UK	01/02/2024
Wallington		UK	01/02/2024
Thame		UK	01/02/2024
Thame	England	UK	01/02/2024
Thame		UK	01/02/2024
Cheshire		UK	01/02/2024
Thame		UK	01/02/2024
Liverpool		UK	01/02/2024
London		UK	01/02/2024
Portadown	Northern Ireland	UK	01/02/2024
Horsham	England	UK	01/02/2024
Northwood		UK	01/02/2024
Stourport-on-severn		UK	01/02/2024
Sevenoaks		UK	01/02/2024
Thame		UK	01/02/2024
Thame		UK	01/02/2024
Mitcham		UK	01/02/2024
Saint Columb Major		UK	01/02/2024
Oxford		UK	01/02/2024

Ipswich		UK	01/02/2024
Littlehampton		UK	01/02/2024
London		UK	01/02/2024
Thame		UK	01/02/2024
2 Crocklands Corner, England		UK	01/02/2024
derby		UK	01/02/2024
Long Crendon	England	UK	01/02/2024
Oxford		UK	01/02/2024
Bingley		UK	01/02/2024
London		UK	01/02/2024
Chippenham		UK	01/02/2024
maidstone		UK	01/02/2024
Hawick		UK	01/02/2024
Thame	England	UK	01/02/2024
Tooting	England	UK	01/02/2024
Abingdon	England	UK	01/02/2024
Croydon		UK	01/02/2024
Thame		UK	01/02/2024
Northampton		UK	02/02/2024
Long Crendon	England	UK	02/02/2024
Norwich		UK	02/02/2024
Hampstead		UK	02/02/2024
Wallingford	England	UK	02/02/2024
Beckton		UK	02/02/2024
Hemel Hempstead		UK	02/02/2024
Aylesbury	England	UK	02/02/2024
Thame		UK	02/02/2024
Wareham	England	UK	02/02/2024
Thame		UK	02/02/2024
Llandudno		UK	02/02/2024
Cookstown		UK	02/02/2024
Sandhurst	England	UK	02/02/2024
Vigo		Spain	02/02/2024
Belfast		UK	02/02/2024
Woodstock	England	UK	02/02/2024
Southport	England	UK	02/02/2024
Thornliebank		UK	02/02/2024
Calcot	England	UK	02/02/2024
Thame		UK	02/02/2024
Farnborough		UK	02/02/2024
Crawley		UK	02/02/2024
Anaheim	California	US	02/02/2024
Shotton		UK	02/02/2024
Swansea		UK	02/02/2024
Taunton		UK	03/02/2024
Swindon		UK	03/02/2024
Oxfordshire	England	UK	03/02/2024
Oxford		UK	03/02/2024
Sutton	England	UK	03/02/2024
London		UK	03/02/2024
HEYWOOD		UK	03/02/2024
Birmingham sutton coldfield		UK	03/02/2024
Hailsham		UK	03/02/2024
Guildford		UK	03/02/2024
Fulham		UK	03/02/2024
Swindon		UK	03/02/2024
blackpool		UK	03/02/2024
Golders Green		UK	03/02/2024
Birmingham		UK	03/02/2024
Barnsley		UK	03/02/2024

Blackburn		UK	04/02/2024
London SE		UK	04/02/2024
Derby		UK	04/02/2024
Edinburgh		UK	04/02/2024
Ash		UK	04/02/2024
Preston		UK	04/02/2024
Thame		UK	04/02/2024
Thame		UK	04/02/2024
Lincoln		UK	04/02/2024
Trowbridge		UK	04/02/2024
Wigan		UK	04/02/2024
Belvedere	England	UK	04/02/2024
Southampton		UK	04/02/2024
Exmouth		UK	04/02/2024
Thame	England	UK	04/02/2024
Weston		UK	04/02/2024
London		UK	05/02/2024
London		UK	05/02/2024
Reading		UK	05/02/2024
Lincoln		UK	05/02/2024
Carlisle		UK	05/02/2024
Greenwich	England	UK	05/02/2024
Stafford		UK	05/02/2024
Thame		UK	05/02/2024
Bexleyheath		UK	05/02/2024
Derby		UK	05/02/2024
Sutton		UK	05/02/2024
Leeds		UK	05/02/2024
Hastings		UK	05/02/2024
London		UK	06/02/2024
Basildon		UK	06/02/2024
Oxford		UK	06/02/2024
Oxford		UK	06/02/2024
Rye		UK	06/02/2024
Hull		UK	06/02/2024
Croydon		UK	06/02/2024
Southampton		UK	06/02/2024
Gillingham		UK	06/02/2024
Eastbourne		UK	06/02/2024
Newcastle Upon Tyne		UK	06/02/2024
Huntingdon		UK	06/02/2024
Birmingham		UK	07/02/2024
Bushey		UK	07/02/2024
Thame		UK	07/02/2024
		UK	07/02/2024
Manchester		UK	07/02/2024
Nottingham		UK	07/02/2024
Islington		UK	07/02/2024
London		UK	07/02/2024
Sherbone	England	UK	07/02/2024
		UK	07/02/2024
Elmswell		UK	07/02/2024
Luton		UK	07/02/2024
Penicuik		UK	07/02/2024
Coventry		UK	07/02/2024
Edinburgh		UK	08/02/2024
Thame		UK	08/02/2024
Leeds		UK	08/02/2024
Waterlooville		UK	08/02/2024
Warrington		UK	08/02/2024

Bognor Regis		UK	08/02/2024
Selby		UK	08/02/2024
Bristol		UK	08/02/2024
London		UK	08/02/2024
Birmingham		UK	08/02/2024
Thame	England	UK	09/02/2024
Halesowen		UK	09/02/2024
Liverpool		UK	09/02/2024
Shipston On Stour		UK	09/02/2024
Shipley		UK	09/02/2024
Bedworth	England	UK	09/02/2024
Newcastle	England	UK	10/02/2024
London		UK	10/02/2024
Reading		UK	10/02/2024
Lymington	England	UK	10/02/2024
Redcar	England	UK	10/02/2024
Southall		UK	10/02/2024
Bradford		UK	11/02/2024
Barnsley	England	UK	11/02/2024
Shabbington	England	UK	11/02/2024
Ely		UK	11/02/2024
Ventnor	England	UK	11/02/2024
Stockport		UK	11/02/2024
London		UK	11/02/2024
Liverpool	England	UK	11/02/2024
Clevedon	England	UK	11/02/2024
Southend-on-sea		UK	11/02/2024
Pembroke	Wales; Cymru	UK	11/02/2024
London	England	UK	11/02/2024
Leeds		UK	11/02/2024
Lewisham	England	UK	11/02/2024
Bristol	England	UK	11/02/2024
Saint Austell	England	UK	12/02/2024
Brentwood	England	UK	12/02/2024
London	England	UK	12/02/2024
Ramsgate	England	UK	12/02/2024
Swindon	England	UK	12/02/2024
South Shields	England	UK	12/02/2024
Waltham Abbey	England	UK	12/02/2024
Thame	England	UK	13/02/2024
Haddenham	England	UK	13/02/2024
Portsmouth	England	UK	13/02/2024
Wolverhampton	England	UK	13/02/2024
Purley		UK	13/02/2024
Bellshill		UK	13/02/2024
		UK	13/02/2024
Kettering	England	UK	13/02/2024
Wigan		UK	13/02/2024
Worthing	England	UK	13/02/2024
Banbury	England	UK	13/02/2024
City of Westminster		UK	13/02/2024
Manchester	England	UK	13/02/2024
Warwick	England	UK	13/02/2024
Saltburn-by-the-Sea	England	UK	13/02/2024
Reading		UK	13/02/2024
Oxford		UK	13/02/2024
Hampton	England	UK	14/02/2024
Hackney		UK	14/02/2024
london	England	UK	14/02/2024
London		UK	14/02/2024

Thame		UK	14/02/2024
St Andrews	Scotland	UK	14/02/2024
Farnborough	England	UK	14/02/2024
Gloucester		UK	14/02/2024
Slough	England	UK	14/02/2024
Enfield		UK	14/02/2024
Mitcham	England	UK	14/02/2024
Portsmouth	England	UK	14/02/2024
London	England	UK	14/02/2024
Leicester	England	UK	14/02/2024
Symbister		UK	15/02/2024
Worcester		UK	15/02/2024
Hove		UK	15/02/2024
Llanelli	Wales; Cymru	UK	15/02/2024
Bath	England	UK	15/02/2024
Doncaster		UK	15/02/2024
Blantyre	Scotland	UK	15/02/2024
Middlesex	England	UK	15/02/2024
Loughton	England	UK	15/02/2024
Tower Hamlets	England	UK	15/02/2024
Bo'ness	Scotland	UK	15/02/2024
Glasgow	Scotland	UK	15/02/2024
Rochdale	England	UK	16/02/2024
Cambridge	England	UK	16/02/2024
Yeovil	England	UK	16/02/2024
Nottingham		UK	16/02/2024
Cam	England	UK	16/02/2024
Leeds	England	UK	16/02/2024
Darlington		UK	16/02/2024
T	England	UK	17/02/2024
Brighton		UK	17/02/2024
Brierley Hill		UK	17/02/2024
Northampton		UK	17/02/2024
Sheffield	England	UK	17/02/2024
		UK	17/02/2024
Cleethorpes	England	UK	17/02/2024
Greenwich	England	UK	17/02/2024
Reading	England	UK	18/02/2024
Blackburn		UK	18/02/2024
Southwick	England	UK	18/02/2024
London		UK	18/02/2024
Wakefield		UK	18/02/2024
Preston		UK	18/02/2024
Claybrooke Parva	England	UK	18/02/2024
Halifax	England	UK	18/02/2024
Woking	England	UK	18/02/2024
Maidstone	England	UK	18/02/2024
Sheffield	England	UK	19/02/2024
Church Crookham	England	UK	19/02/2024
Exeter		UK	19/02/2024
Paignton		UK	19/02/2024
		UK	19/02/2024
Liverpool	England	UK	19/02/2024
Southwark	England	UK	19/02/2024
Walthamstow's	England	UK	19/02/2024
Great Dunmow		UK	20/02/2024
		UK	20/02/2024
Mitcham		UK	20/02/2024
Leeds	England	UK	20/02/2024
Sheffield	England	UK	20/02/2024

Colwyn Bay	Wales; Cymru	UK	20/02/2024
Swanscombe	England	UK	20/02/2024
Macclesfield	England	UK	20/02/2024
Bath		UK	20/02/2024
Thame		UK	20/02/2024
Chatham	England	UK	20/02/2024
		UK	20/02/2024
Middlesbrough		UK	20/02/2024
Milton Keynes		UK	20/02/2024
Newtownabbey	Northern Ireland	UK	21/02/2024
London		UK	21/02/2024
Bishop's Stortford	England	UK	21/02/2024
Hounslow	England	UK	21/02/2024
Southwark		UK	21/02/2024
Sandridge	England	UK	21/02/2024
Sheffield	England	UK	21/02/2024
Manchester	England	UK	21/02/2024
London		UK	21/02/2024
Uxbridge	England	UK	21/02/2024
Yeovil	England	UK	21/02/2024
Sheffield	England	UK	21/02/2024
Leicester		UK	21/02/2024
Poole	England	UK	21/02/2024
Southampton	England	UK	21/02/2024
Guildford	England	UK	21/02/2024
Stoke-on-Trent		UK	21/02/2024
Brixton		UK	22/02/2024
Custom House	England	UK	22/02/2024
Wigan		UK	22/02/2024
Keelby	England	UK	22/02/2024
bridlington	England	UK	22/02/2024
Rochdale	England	UK	22/02/2024
Wandsworth	England	UK	22/02/2024
Newbury	England	UK	22/02/2024
Leighton Buzzard	England	UK	22/02/2024
Newcastle upon Tyne	England	UK	22/02/2024
Leicester	England	UK	22/02/2024
edinburgh	Scotland	UK	23/02/2024
Brighton	England	UK	23/02/2024
Rostrevor	Northern Ireland	UK	23/02/2024
Deepcut	England	UK	23/02/2024
Leicester	England	UK	23/02/2024
Sunderland		UK	23/02/2024
Beccles	England	UK	23/02/2024
Guildford		UK	23/02/2024
Neath	Wales; Cymru	UK	23/02/2024
Belfast		UK	24/02/2024
Edinburgh	Scotland	UK	24/02/2024
Edinburgh	Scotland	UK	24/02/2024
Callington	England	UK	24/02/2024
Colchester		UK	24/02/2024
Southend-on-Sea	England	UK	24/02/2024
Twyford	England	UK	24/02/2024
Cardiff	Wales; Cymru	UK	24/02/2024
Greenwich		UK	25/02/2024
West End	England	UK	25/02/2024
Sunderland	England	UK	25/02/2024
Blackburn		UK	25/02/2024
Royston	England	UK	25/02/2024
Leeds	England	UK	25/02/2024

Fleet	England	UK	25/02/2024
Manchester	England	UK	25/02/2024
Taunton	England	UK	25/02/2024
Boston	England	UK	25/02/2024
Prestatyn	Wales; Cymru	UK	25/02/2024
London	England	UK	26/02/2024
Çraigavon	Northern Ireland	UK	26/02/2024
Wirral	England	UK	26/02/2024
Enfield		UK	26/02/2024
Wolverhampton		UK	26/02/2024
Livingston	Scotland	UK	26/02/2024
Coalville	England	UK	26/02/2024
Coalville	England	UK	26/02/2024
Kirkcaldy	Scotland	UK	26/02/2024
Penarth	Wales; Cymru	UK	26/02/2024
Edinburgh	Scotland	UK	27/02/2024
Middlesbrough		UK	27/02/2024
Welling	England	UK	27/02/2024
London	England	UK	27/02/2024
Wolverhampton		UK	27/02/2024
Manchester	England England	UK	27/02/2024
Lambeth		UK	27/02/2024
Carlisle		UK	27/02/2024
Teddington	England	UK	27/02/2024
		UK	28/02/2024
Greenford		UK	28/02/2024
Bristol	England	UK	28/02/2024
Aylesbury	England	UK	28/02/2024
Kinver	England	UK	28/02/2024
Cardiff	Wales; Cymru	UK	28/02/2024
Redditch	England	UK	28/02/2024
Oxford		UK	28/02/2024
Maidstone	England	UK	28/02/2024
Watford	England	UK	28/02/2024
Enfield		UK	28/02/2024
Reading		UK	28/02/2024
Wednesbury	England	UK	28/02/2024
Stanwell	England	UK	28/02/2024
Aberdeen	Scotland	UK	28/02/2024
Scunthorpe	England	UK	28/02/2024
Edinburgh		UK	28/02/2024
Newbiggin-by-the-Se	England	UK	28/02/2024
Worthing	England	UK	28/02/2024
Bedford	England	UK	28/02/2024
Stroud		UK	28/02/2024
Birmingham	England	UK	28/02/2024
Cambridge	England	UK	29/02/2024
Cambridge		UK	29/02/2024
London	England	UK	29/02/2024
Cannock	England	UK	29/02/2024
Worcester		UK	29/02/2024
Troon	Scotland	UK	29/02/2024
London	England	UK	29/02/2024
London		UK	29/02/2024
Derby	England	UK	29/02/2024
Bournemouth		UK	29/02/2024
Manchester	England	UK	29/02/2024
Banbury	England	UK	29/02/2024
Broadwas	England	UK	29/02/2024
Reading		UK	29/02/2024

Leeds	England	UK	29/02/2024
Worcester	England	UK	29/02/2024
Radstock		UK	29/02/2024
Royal Leamington Sp	England	UK	01/03/2024
Poole	England	UK	01/03/2024
Loughborough	England	UK	01/03/2024
Strabane	Northern Ireland	UK	01/03/2024
Hackney		UK	01/03/2024
Richmond Surrey		UK	01/03/2024
Coventry		UK	01/03/2024
Martin Hussingtree	England	UK	01/03/2024
Bristol	England	UK	01/03/2024
Banbury	England	UK	01/03/2024
		UK	01/03/2024
Matlock		UK	01/03/2024
Cardiff	Wales; Cymru	UK	01/03/2024
Rochdale	England	UK	02/03/2024
London	England	UK	02/03/2024
Milford Haven	Wales; Cymru	UK	02/03/2024
London		UK	03/03/2024
London	England	UK	03/03/2024
Thame	England	UK	03/03/2024
Oxford		UK	03/03/2024
Cambridge		UK	03/03/2024
Frodsham	England	UK	03/03/2024
Ipswich		UK	03/03/2024
Leicestershirr		UK	03/03/2024
Keyingham	England	UK	03/03/2024
City of Westminster		UK	03/03/2024
Hull		UK	04/03/2024
Aberdeen	Scotland	UK	04/03/2024
Manchester	England	UK	04/03/2024
Thornton-Cleveleys	England	UK	04/03/2024
London	England	UK	04/03/2024
Stoke-on-trent		UK	04/03/2024
Grays	England	UK	04/03/2024
Teignmouth	England	UK	04/03/2024
Llanelli	Wales; Cymru	UK	04/03/2024
Wanstead	England	UK	04/03/2024
Edgware		UK	04/03/2024
Burlescombe	England	UK	04/03/2024
Worksop	England	UK	04/03/2024
London		UK	04/03/2024
	England	UK	04/03/2024
Gt Yarmouth	England	UK	04/03/2024
Leigh		UK	05/03/2024
Plymouth	England	UK	05/03/2024
Torquay	England	UK	05/03/2024
London		UK	05/03/2024
Holland On Sea Essex		UK	05/03/2024
Dunfermline	Scotland	UK	05/03/2024
Ipswich	England	UK	05/03/2024
Birmingham	England	UK	06/03/2024
Rugeley	England	UK	06/03/2024
Ipswich	England	UK	06/03/2024
LONDON	England	UK	06/03/2024
Brighton		UK	06/03/2024
Colchester	England	UK	06/03/2024
bristol	England	UK	06/03/2024
Lewisham	England	UK	06/03/2024

Exeter		UK	06/03/2024
Macclesfield	England	UK	06/03/2024
Chesterfield	England	UK	06/03/2024
Chigwell Essex	England	UK	06/03/2024
sunderland	England	UK	06/03/2024
Morpeth	England	UK	06/03/2024
London	England	UK	06/03/2024
Paignton		UK	06/03/2024
Maldon		UK	06/03/2024
		UK	06/03/2024
Rochester	England	UK	07/03/2024
Pinner	England	UK	07/03/2024
Manchester	England	UK	07/03/2024
Manchester	England	UK	07/03/2024
Walsall	England	UK	07/03/2024
Greater Manchester	England	UK	07/03/2024
Dumfries	Scotland	UK	07/03/2024
Hastings	England	UK	07/03/2024
London	England	UK	07/03/2024
London		UK	07/03/2024
York	England	UK	07/03/2024
Gateshead		UK	07/03/2024
Bradford	England	UK	08/03/2024
Hitchin		UK	08/03/2024
Taunton		UK	08/03/2024
St Ives	England	UK	08/03/2024
Southport	England	UK	08/03/2024
Colchester		UK	08/03/2024
Morecambe	England	UK	08/03/2024
Dunbar	Scotland	UK	08/03/2024
Watford	England	UK	08/03/2024
Ilkeston	England	UK	08/03/2024
Scunthorpe	England	UK	08/03/2024
Inverness		UK	08/03/2024
Great Blakenham	England	UK	08/03/2024
Hampstead		UK	09/03/2024
		UK	09/03/2024
Liverpool		UK	09/03/2024
Hackney	England	UK	09/03/2024
Hackney		UK	10/03/2024
Ropley	England	UK	10/03/2024
Belfast	Northern Ireland	UK	10/03/2024
Cwmbach	Wales; Cymru	UK	10/03/2024
Brighton		UK	10/03/2024
Whiston	England	UK	10/03/2024
London		UK	10/03/2024
West midlands	England	UK	10/03/2024
Cambridge	England	UK	10/03/2024
East Ham		UK	10/03/2024
London	England	UK	10/03/2024
Alfreton	England	UK	10/03/2024
Dover	England	UK	10/03/2024
Accrington		UK	11/03/2024
Coventry		UK	11/03/2024
Bethnal Green		UK	11/03/2024
Wembley		UK	11/03/2024
Rossendale	England	UK	11/03/2024
London	England	UK	11/03/2024
London	England	UK	11/03/2024
Sunbury-on-Thames	England	UK	11/03/2024

Camberwell		UK	12/03/2024
London		UK	12/03/2024
Wembley		UK	12/03/2024
London		UK	12/03/2024
South Shields	England	UK	13/03/2024
Bloomsbury	England	UK	13/03/2024
Heald Green	England	UK	13/03/2024
Salisbury	England	UK	13/03/2024
Upminster	England	UK	13/03/2024
Sittingbourne	England	UK	13/03/2024
Bristol	England	UK	14/03/2024
London	England	UK	14/03/2024
Carlton	England	UK	14/03/2024
Cardiff	Wales; Cymru	UK	14/03/2024
Manc	England	UK	14/03/2024
London	England	UK	14/03/2024
		UK	14/03/2024
Coventry		UK	14/03/2024
Chadlington	England	UK	14/03/2024
Oxford	England	UK	14/03/2024
Chester	England	UK	14/03/2024
Spalding	England	UK	15/03/2024
Kent	England	UK	15/03/2024
Port Talbot	Wales; Cymru	UK	15/03/2024
Derby	England	UK	15/03/2024
		UK	15/03/2024
Mánchester	England	UK	15/03/2024
Peterborough		UK	15/03/2024
Portsmouth		UK	15/03/2024
Beeston	England	UK	15/03/2024
Mansfield	England	UK	15/03/2024
Lenham	England	UK	16/03/2024
Witney	England	UK	16/03/2024
Northolt	England	UK	16/03/2024
Paisley		UK	16/03/2024
Hardwicke		UK	16/03/2024
Nottingham		UK	17/03/2024
Basildon	England	UK	17/03/2024
Stockton-on-Tees	England	UK	17/03/2024
Newquay	England	UK	17/03/2024
Nuneaton	England	UK	17/03/2024
West Byfleet	England	UK	17/03/2024
Oldham		UK	17/03/2024
Birmingham	England	UK	17/03/2024
Stamford		UK	17/03/2024
Wirral	England	UK	18/03/2024
Bexley		UK	18/03/2024
Harwich	England	UK	18/03/2024
London	England	UK	18/03/2024
London	England	UK	18/03/2024
Greenwich	England	UK	18/03/2024
Nuneaton	England	UK	18/03/2024
Doncaster	England	UK	18/03/2024
Swindon	England	UK	18/03/2024
Uxbridge		UK	19/03/2024
Chesterfield	England	UK	19/03/2024
Alton	England	UK	19/03/2024
		UK	19/03/2024
Maidenhead	England	UK	19/03/2024
Redcar	England	UK	19/03/2024

Worcester	England	UK	19/03/2024
Oldham		UK	19/03/2024
County Durham	England	UK	19/03/2024
Birmingham	England	UK	19/03/2024
Hitler green	England	UK	20/03/2024
Great Finborough	England	UK	20/03/2024
Derby	England	UK	20/03/2024
Folkestone		UK	20/03/2024
Croydon		UK	20/03/2024
Birmingham	England	UK	20/03/2024
Leicester city	England	UK	20/03/2024
Stourbridge		UK	21/03/2024
		UK	21/03/2024
cardigan	Wales; Cymru	UK	21/03/2024
Queenborough	England	UK	21/03/2024
Nottingham		UK	21/03/2024
London		UK	21/03/2024
		UK	21/03/2024
Stourport-on-Severn	England	UK	21/03/2024
Rhyl	Wales; Cymru	UK	21/03/2024
Rainham	England	UK	21/03/2024
Linlithgow	Scotland	UK	21/03/2024
bacup	England	UK	22/03/2024
Bletchley	England	UK	22/03/2024
Shefford	England	UK	22/03/2024
Sunderland		UK	22/03/2024
Croydon		UK	22/03/2024
Burnley	England	UK	22/03/2024
Southampton	England	UK	22/03/2024
Reading		UK	22/03/2024
Frome	England	UK	22/03/2024
Glasgow	Scotland	UK	23/03/2024
Birmingham	England	UK	23/03/2024
Smethwick	England	UK	23/03/2024
Esher	England	UK	23/03/2024
Torquay	England	UK	23/03/2024
Lochgilphead	Scotland	UK	23/03/2024
Essex	England	UK	24/03/2024
Farnham	England	UK	24/03/2024
Thornton Dale	England	UK	24/03/2024
Birmingham	England	UK	24/03/2024
Portslade	England	UK	24/03/2024
Wisbech	England	UK	24/03/2024
		UK	24/03/2024
Norwich		UK	24/03/2024
		UK	24/03/2024
west sussex	England	UK	25/03/2024
York	England	UK	25/03/2024
Bristol	England	UK	25/03/2024
Fleet	England	UK	25/03/2024
Middlesbrough		UK	25/03/2024
Hackney	England	UK	25/03/2024
London	England	UK	26/03/2024
Plymouth	England	UK	26/03/2024
Kudüs		Turkey	26/03/2024
Clydebank	Scotland	UK	26/03/2024
southend	England	UK	26/03/2024
Manchester	England	UK	26/03/2024
London	England	UK	27/03/2024
London		UK	27/03/2024

Rotherham	England	UK	27/03/2024
London		UK	27/03/2024
London	England	UK	27/03/2024
Frome	England	UK	27/03/2024
Lincoln		UK	27/03/2024
Berkhamsted	England	UK	27/03/2024
Newtownabbey	Northern Ireland	UK	27/03/2024
Wickford	England	UK	27/03/2024
Didcot	England	UK	27/03/2024
Romford		UK	27/03/2024
Mansfield	England	UK	27/03/2024
Gateshead		UK	27/03/2024
Birmingham	England	UK	27/03/2024
Ascot		UK	27/03/2024
merseyside	England	UK	27/03/2024
Basildon	England	UK	28/03/2024
Market Rasen	England	UK	28/03/2024
Cardiff	Wales; Cymru	UK	28/03/2024
Catford		UK	28/03/2024
Holywell		UK	28/03/2024
Mawsley	England	UK	28/03/2024
New Southgate	England	UK	28/03/2024
Brierley Hill	England	UK	28/03/2024
Faversham	England	UK	28/03/2024
Solihull	England	UK	28/03/2024
South Marston	England	UK	28/03/2024
Chalfont Saint Giles		UK	28/03/2024
Mitcham	England	UK	28/03/2024
Edinburgh	Scotland	UK	28/03/2024
Chacewater	England	UK	28/03/2024
Tower Hamlets	England	UK	29/03/2024
Ilford	England	UK	29/03/2024
Greater London	England	UK	29/03/2024
Whitstable	England	UK	29/03/2024
Cardiff	Wales; Cymru	UK	29/03/2024
Ambleside	England	UK	29/03/2024
Bideford	England	UK	29/03/2024
London	England	UK	29/03/2024
		UK	29/03/2024
Exeter		UK	30/03/2024
Radstock		UK	30/03/2024
Birmingham	England	UK	30/03/2024
london	England	UK	31/03/2024
Halifax	England	UK	31/03/2024
London		UK	31/03/2024
Fradley	England	UK	31/03/2024
Leicester	England	UK	31/03/2024
london	England	UK	01/04/2024
Newport	Wales; Cymru	UK	01/04/2024
West Drayton	England	UK	01/04/2024
St. Albans	England	UK	01/04/2024
Glasgow	Scotland	UK	02/04/2024
Bradford		UK	02/04/2024
Gloucestershire		UK	02/04/2024
Leicester		UK	02/04/2024
Weybridge	England	UK	02/04/2024
London	England	UK	02/04/2024
London	England	UK	02/04/2024
London		UK	02/04/2024
Keighley	England	UK	02/04/2024

London	England	UK	02/04/2024
kent		UK	02/04/2024
South shields		UK	02/04/2024
Southampton	England	UK	02/04/2024
Slough	England	UK	02/04/2024
Reading	England	UK	03/04/2024
Preston		UK	03/04/2024
Chesterton	England	UK	03/04/2024
Taynuilt	Scotland	UK	03/04/2024
London	England	UK	03/04/2024
Epsom	England	UK	03/04/2024
		UK	03/04/2024
Bromley		UK	03/04/2024
		UK	03/04/2024
Brentwood	England	UK	03/04/2024
Larkhall	Scotland	UK	03/04/2024
Belfast	Northern Ireland	UK	03/04/2024
Kingsbridge		UK	03/04/2024
Radstock		UK	03/04/2024
Penarth	Wales; Cymru	UK	03/04/2024
Bristol	England	UK	03/04/2024
Perthshire		UK	03/04/2024
Northampton	England	UK	03/04/2024
London	England	UK	03/04/2024
Derby	England	UK	03/04/2024
Northampton		UK	03/04/2024
Chiswick		UK	03/04/2024
Greenwich		UK	03/04/2024
Sleaford	England	UK	03/04/2024
Romford	England	UK	03/04/2024
Caldbeck	England	UK	03/04/2024
Kirkcaldy		UK	03/04/2024
Exeter		UK	03/04/2024
Derby		UK	03/04/2024
London	England	UK	04/04/2024
London		UK	04/04/2024
		UK	04/04/2024
Leyton	England	UK	04/04/2024
Bristol	England	UK	04/04/2024
Stlves		UK	04/04/2024
CHEADLE, Cheshire		UK	04/04/2024
Saltcoats	Scotland	UK	04/04/2024
Congleton	England	UK	04/04/2024
		UK	04/04/2024
Crewe	England	UK	04/04/2024
Bexleyheath		UK	04/04/2024
Cardiff	Wales; Cymru	UK	04/04/2024
Chepstow	Wales; Cymru	UK	04/04/2024
renfrewshire	Scotland	UK	04/04/2024
Winchester	England	UK	05/04/2024
Kelloe		UK	05/04/2024
Dudley		UK	05/04/2024
Isleworth	England	UK	05/04/2024
Leicester	England	UK	05/04/2024
London	England	UK	05/04/2024
Sheffield	England	UK	05/04/2024
Derby	England	UK	05/04/2024
Velindre	Wales; Cymru	UK	05/04/2024
Wiltshire	England	UK	06/04/2024
Dumfries		UK	06/04/2024

Edinburgh		UK	06/04/2024
Bognor Regis	England	UK	06/04/2024
Birmingham	England	UK	06/04/2024
Saint Austell	England	UK	06/04/2024
Inverurie	Scotland	UK	06/04/2024
Norwich		UK	06/04/2024
Wisbech	England	UK	06/04/2024
Borehamwood	England	UK	06/04/2024
West Drayton		UK	06/04/2024
Lichfield	England	UK	06/04/2024
Cranleigh	England	UK	06/04/2024
Plymouth	England	UK	06/04/2024
Colchester	England	UK	07/04/2024
Brookland	England	UK	07/04/2024

Response 37: ID ANON-MT75-C6HG-N

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 21:35:09

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Christina Hatton

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I respectfully object to the current format of the Thame Neighborhood plan for the below reasons;

1. The proposed area to the north of Oxford road was agreed not to be built on with an agreement between the builder and the council in order to build the current Thame Meadows Estate . This legal agreement should be adhered to and the area should remain publicly accessible green space as was agreed in the Thame Neighbourhood Plan. Save our green spaces.
2. The area north of Oxford road is a flood plain. The model used in the plans depicts the flood risk of 100 years +30%, however this years floods 2 weeks ago have already been this high, which you can see when overlaying recent photos and the flood risk maps. This is hugely worrying for further development as it will only worsen here and further downstream.
3. Thames Water have directly objected to planning on the land north of Oxford road on the current planning proposal because they cannot meet the sewerage and water requirements here. Other locations for new houses should be considered where residents can have water and sewerage safely.
5. The further houses will mean at a minimum 300 further patients at our doctor s surgery, dentists and many places at local schools and nursery s. Having been unable to get my children into local nurseries and having to drive to outside villages to provide this, our infrastructure is just not set up for this number of houses, and the TNP has no extra nursery doctors or schools yet plenty more houses!
6. The environmental impact to building new houses north of Oxford road right by the nature reserve will be tragic to the loss of species here. It is known to house and sustain deer, fox, hedgehogs, woodpeckers, bats, newts, frogs, kingfishers, fieldfare, peregrine falcon, red kites, over 60 types of bird species, mice, and otters have even been found here.
7. No green space is found separating the current development north of Oxford road from the new development down weavers branch. Here there are historic hedgerows which sustain many of the species discussed above. This is also in direct conflict with the TNP, other information the developer

submitted and not in keeping with all previous new developments in Thame if this must go ahead green space MUST separate the new and the old.

8. For all the new housing developments proposed there is no new green space. Only less. This is a travesty especially when our council is highlighting how overused the nature reserve is and telling us not to use it.

9. The cattlemarket plans for a new supermarket mean that the largest school in thame no longer has a car park to drop kids. This would mean all those cars parking along ludsden grove and denbeigh road - both of which are already overpacked and dangerous with kids coming out of school, drivers going to fast. There have already been too many near misses! On top of this the old co-op sits empty and would be the perfect spot for a new low cost supermarket!

11. The density and scale of the housing plans in all areas far exceed that of the current estates and not in keeping with surroundings, especially on the land north of Oxford road, where reports from experts on the planning portal support this.

12. The council have barely advertised this consultation for the TNP. I have spoken with a lot of people and hardly anyone knows about it. I suspect this will be reflected in the response rate, and therefore not really reflect the wants of the town. There should be more involvement from the community and people should be allowed to be involved - as clearly stated in government guidance for neighborhood planning. I know of people who have asked to be involved and turned away as it would take too long. This is not really adhering to the government guidance and the process Thame Council are using should be reviewed.

Thanks

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

I don't think the cattlemarket should be developed to such an extent without a proper car park for the school to use.

I think the area north of Oxford road should not be built on.

I think there should be more not less green space, and that more provision should be included for cycling paths.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

I do not believe Thame council have advertised or engaged the community enough on this as I know a lot of people and hardly any of them know about it!

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 38: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 22:02

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

Nichola Hewitt

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post Code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

****EXTERNAL****

ANON-MT75-C6H9-7.

In addition to my comments posted earlier about the proposed Thame Neighbourhood Plan, I would like to add that at no point have the residents of Thame been consulted. It feels like we have been kept at arms length, which goes against the government guidance on producing neighbourhood plans.

As I also said in my feedback, the council have completely disregarded the 1400 approx signatures on a petition as well as the huge amounts of objections to building on Oxford Road. I don't understand how a plan can be accepted when it clearly goes against the community opinion. This is another reason I would like a hearing, so that we can actually get our voices heard, as per government guidance. Otherwise it would be very unfair.

I couldn't amend my survey answers hence the email!

Thank you in advance,

Nichola Hewitt

This email originates from outside of the council.

Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe. If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Response 39: ID ANON-MT75-C6HH-P

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 22:13:29

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Peter PARREY

Job title (if relevant):

██████████

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

████████████████████

Address line 2:

Address line 3:

Postal town:

██████████

Post code:

██████████

Telephone number:

██████████████████

Email:

██

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Further development of the Thame Meadows site will mean building on a flood plain, whilst the builders say this will have no additional effect on the current level of flooding this cannot be correct. I have lived in Thame for over 50 years and it has been very noticeable of late that the flood plain is getting larger and larger each year. Clearly this is an effect of climate change. It was notable this year that the field on each side of the A418 (Thame bypass) flooded in July this year. Where do the developers plan to move the water that will be displaced to? Can Thames Water manage this displaced water and additional sewage that the 100 new homes will create? Clearly TW can't cope at the moment as they are pumping waste water into local streams. How long will it be before the Cuttlebrook Nature Reserve becomes a no go area due to the polluted water?

I am also concerned about the additional traffic on the development, more cars driving past the children's play area. Only one access road in and out of the development gives concerns about emergency vehicle access to the estate. How is the builders site traffic to be managed? Will it mean large lorries delivering building materials at times when children are going and coming from school, early mornings when residents are going to work? Are the council prepared to unnecessarily risk the lives of young children?

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

People should be aware of what is going on in the community

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

████

Other, please specify:

Response 40: ID ANON-MT75-C6HP-X

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 22:55:20

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:
Daniel

Job title (if relevant):
Student

Organisation (if relevant):

[REDACTED]

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Firstly, I believe there is not enough good provision for Commercial Activity in the suburbs of Thame. Lea Park and other slightly newer areas of Thame are frankly desolate with their amenities. All of Thame's activity relies upon the Town Centre, which for many areas are long distances or for some, inaccessible. To my knowledge, Lea Park when developed was planned to have community buildings and shops in it, but only a primary school was built. This leaves long walks, encourages driving and makes the area very lonely. Even bulldozing a couple of houses to build a Tesco extra is fine if that's what it takes. I have attached a map of Thame with radiuses of the areas are within the policy limit of where makes a "Walkable town" and the distance of 400m to a "Local Shop". Any area not in the green is not within this legal guidance.

Secondly, there is a large lack of fun and interest to outsiders to Thame. In the long term, this reduces income to the area, and with an decreasing amount of residential space that is not affordable, an aging population will in the end cause a economic decline in Thame overall. It is clear that Thame needs a certain amount of Tourism to sustain itself in the long run. Therefore, in addition to the existing attractions of Causton and Thame museum, I believe that we should have more space dedicated to Fun. The opened up land in the cattle market could be much more useful to Thame if it was used to create attractions for Thame. Anything from a Mini Golf Course, to an urban farm, to a public open air swimming pool to Model railways. Even if it was just a tourist bus park it would be better than turning it into a place for the old people to have fancy houses or a bowls club or another barber shop. And DON'T by any means put an Lidl in the town centre with a massive carpark, because that is just create more traffic on overworked streets and in 30 years time will have people shouting about having too much traffic or pollution while sat in their front gardens.

I think your comments on Public Transport are correct, that we need more of it, but I failed to find any substance in the plan. Let's keep the Phoenix trail,

and make it better. Connect more neighborhoods to it, and make more inter-village routes. Also, make more high quality cycle and walking paths internally too. There are many areas, that because they are cut off, or have sharp corners, they create massive out of the way routes to get between places in the town. I don't think this improves connectivity (just a slight guess). Areas like the connection between Lea Park and the Cattle Market footpath is too narrow and sharp cornered to hold cycle traffic, when it easily could. This could massively increase the population cycling their kids to school.

Public transport is a bit poor in Thame too. The Greenway project has taken 10 years to put in place, and isn't even struck ground yet! And the fact that the plan diagrams has just chucked in willy nilly more similar paths seems a little irresponsible at getting people's hopes up. I am an Avid cyclist, and go to school on a bike as often as I can, and would love to see many more greenway projects, but it will not happen at the current rate. Instead, give us good public transport. A clause in your plan should not be that each NEW development should have a bus stop, but ALL developments should have a bus stop. A good connection to more than one major town should be provided. Even create a Road Train that takes people down the phoenix trail to Princes Risborough Station, and increasing tourism. It would be lots of fun, make money from commuters and provide childcare. Seems like a good suggestion to me.

The wording in these consultations is not easy, so many people like me will not be good at answering your questions. But if you were asking me, a Lord Williams Student who is 16 (most likely your youngest respondent and most definatley the future of this town) about the proposed land for housing, I would say it is good. Each site is well placed, none seem out of shape or at the wrong size, and if 40% are 'affordable housing' then all is good. If you find that people shout about the Oxford Road development because of flooding, then maybe they are right. Don't compromise the safety of the land for houses. But for me and I'm sure many other people my age, I am looking at moving to university, but if I was to come back to this area, and find a nice cheap house in an attractive town, I am moving to Thame. This town needs to cater to younger and less well off people more than ever, because as house prices rise, Thame will get very elderly and will economically collapse, just like Cornwall, or Purbeck, or any other rich place with no employment.

Best regards, and many wishes in your further Neighborhood planning,
Daniel Edwards (16)

You can upload supporting evidence here:
Screenshot 2024-07-24 214941.png was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

If you could kindly, I would like to see straightforward wording, plain english if you will. I'm 16, and I'm sure half the people responding to this don't know what you're saying either.

Get someone to proof read it first.

Many wishes in your further Neighborhood planning,
D.E.

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

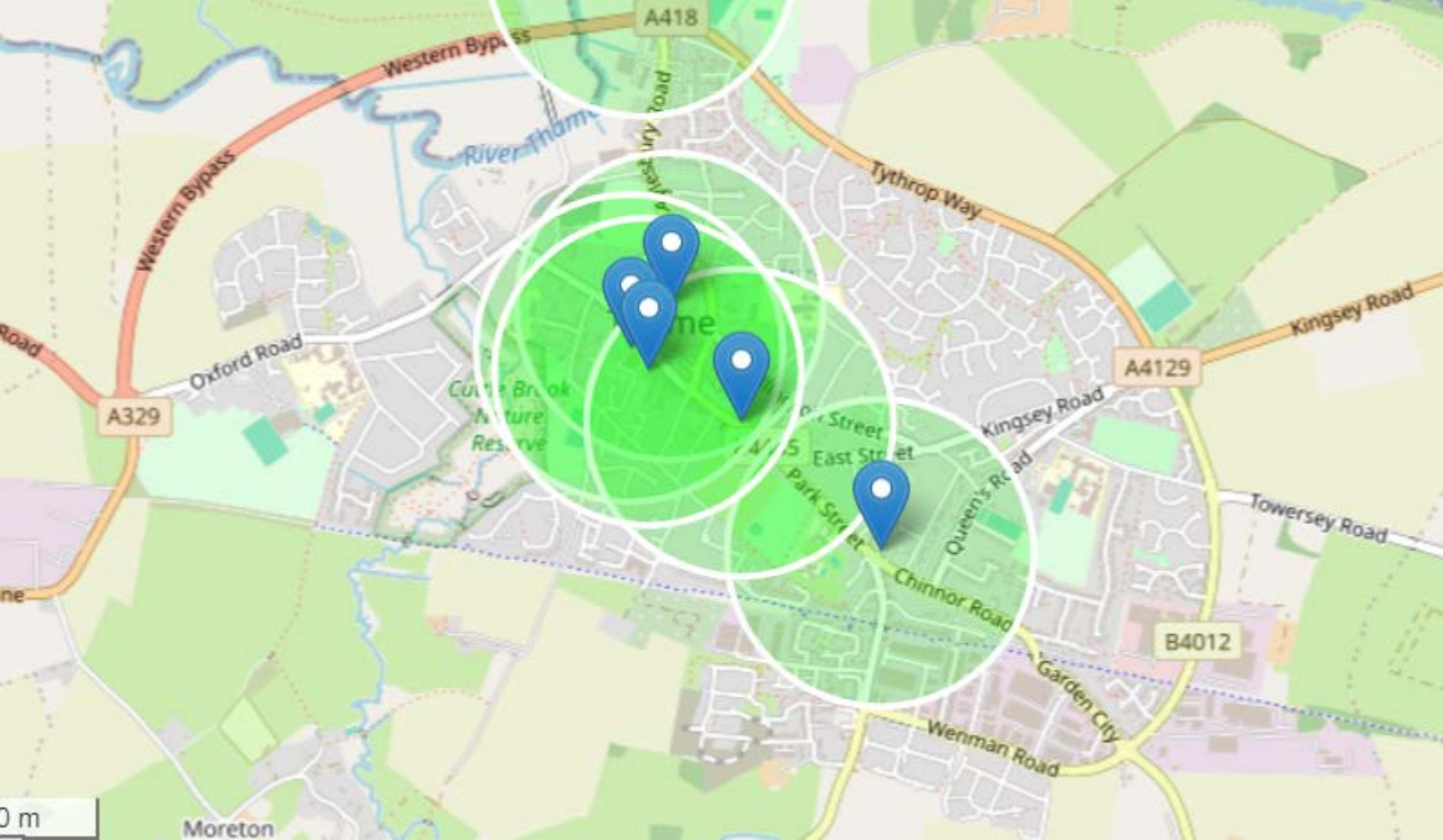
I think people need time to express their views in full, in front of a real person. But i

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other social media accounts, Newsletter, Word of mouth, Parish Council

Other, please specify:



Western Bypass

A418

River Thames

Tythrop Way

Kingsey Road

A4129

Oxford Road

A329

Cute Brook
Nature
Reserve

Kingsey Road

East Street

Towersey Road

Park Street

Chinnor Road

B4012

Wenman Road

Garden City

Moreton

0 m

Response 41: ID ANON-MT75-C6HV-4

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 08:57:16

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Stephanie

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Response 42: ID ANON-MT75-C6HA-F

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 09:16:47

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

██████████

Job title (if relevant):

Planning Policy Officer (Neighbourhood)

Organisation (if relevant):

South Oxfordshire District Council

Organisation representing (if relevant):

Address line 1:

Abbey House

Address line 2:

Abbey Close

Address line 3:

Postal town:

Abingdon

Post code:

OX14 3JE

Telephone number:

Email:

planning.policy@southandvale.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

South Oxfordshire District Council has worked to support Thame Town Council in the preparation of their neighbourhood plan review and compliments them on a very thoughtful, comprehensive and well produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Thame Neighbourhood Development Plan Review (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan meets the basic conditions.

You can upload supporting evidence here:

Thame Review Reg 16 DC Comments.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?



Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Policy and Programmes

HEAD OF SERVICE: TIM ORUYE



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

25 July 2024

Thame Neighbourhood Development Plan Review – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

South Oxfordshire District Council has worked to support Thame Town Council in the preparation of their neighbourhood plan review and compliments them on a very thoughtful, comprehensive and well produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Thame Neighbourhood Development Plan Review (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan meets the basic conditions.

[REDACTED]
Planning Policy Officer (Neighbourhood)

Please note the text in *italics* shows our recommended changes to the text.

Ref.	Section/Policy	Comment/Recommendation
1	Page 7: Para 2.3	<p>Paragraph 2.3 currently lacks clarity. We recommend that the paragraph is reworded as follows to ensure it accurately reflects the current status of the Joint Local Plan (JLP):</p> <p><i>“A new Joint Local Plan (JLP) is now being prepared by South Oxfordshire District Council in partnership with the Vale of White Horse District Council. The Preferred Options Consultation of this (published in January 2024). This will covers the period 2021 – 2041-. The plan period for TNP2 is aligned with this. The JLP Preferred Options, published for Cconsultation in January 2024, includes a strategy for Thame at Policy SP7. This is broadly aligned with Policy TH1 in the adopted South Oxfordshire Local Plan.”</i></p>
2	Page 8: Para 2.4	<p>The first bullet point of paragraph 2.4 currently lacks clarity. We recommend that the paragraph is reworded as follows to ensure it accurately reflects the housing requirements for Thame:</p> <p><i>“A minimum of 339 new homes to be accommodated in Thame over the period 2020 – 2035. However, since the Local Plan was adopted, planning permissions and development have come forward in Thame and which count towards the housing requirement. The Joint Local Plan Preferred Options sets out that, as of 1 April 2023, the housing requirement for Thame is for 143 homes over the period 2021 – 2041. Thame Town Council has been advised by the council to work towards delivering this updated figure through the TNP2”</i></p>
3	Page 20: Para 4.7	<p>This paragraph expresses that the sites allocated for development in the Thame Neighbourhood Plan 2013 have been built out. This is not the case for all the sites allocated; the site at The Elms has been brought forward from the TNP1 to this Plan. The structure of this paragraph could also be improved to enhance its clarity and to ensure that it accurately reflects the housing requirement for Thame. We therefore recommend the following wording:</p> <p><i>“Land allocated within the first Neighbourhood Plan represented the preferred sites for growth in and around Thame, reflecting constraints and the vision and objectives for the town. Several of tThe sites allocated for development in TNP1 have now been</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>built out and others have outstanding planning approval. and The South Oxfordshire Local Plan notes that, as of April 2020, there is was an outstanding minimum requirement of 339 new homes to be accommodated in Thame as of April 2020. Further monitoring undertaken and which takes account of completions and committed development scheme since April 2020 has reduced this figure to 143 homes. This requirement is for the period 2021 – 2041 to be covered by the new Joint Local Plan being prepared by South Oxfordshire and the Vale of White Horse District Council.”</i></p>
4	Policy GDH1: Housing Development and allocations	<p>We note that this Policy is a combination of Policy GDH1 and GDH2 from the pre-submission draft version of the Plan. As written, this policy attempts to address matters associated with housing development and allocations collectively. Many of the paragraphs in the first half of the policy address the potential suitability of a site for development, whilst paragraphs 9, 10, and 11 refer specifically to allocated sites in the Plan. We recommend that the policy is split to deal with housing development and allocations separately. This will ensure the policy has the clarity required by the NPPF.</p> <p>The policy can easily be separated into two policies; one addressing housing development more generally and one identifying the allocations. The individual site-based requirements for each allocation are laid out in separate policies following Policy GDH1.</p> <p>The wording of the first half of this Policy (paragraph 1-8) currently lacks clarity and reads more like site assessment criteria for a proposed allocation rather than a policy guiding/testing the suitability of development proposed in a given location. We therefore recommend the rewording of this section (see below).</p> <p>Paragraph 1 is more permissive in its approach to windfall development than the South Oxfordshire Local Plan 2035. The Local Plan only provides support for development within the built-up area of a settlement (Policy H1 Para 3ii) unless it is an exception site. The current wording for this paragraph would provide support for all types of residential development on sites outside of the built-up area of Thame. We therefore recommend that the wording in this policy is aligned with that found in the South Oxfordshire Local</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Plan 2035. The preference for the reuse of previously developed land is already covered by the NPPF. We therefore recommend this is removed to avoid duplication.</p> <p>We note that paragraph 6 states that, where required, a Transport Assessment or Transport Statement must be based on the 'Decide and Provide' approach adopted by OCC. As this document is only guidance and not a development plan document, it has not been examined, and the policy cannot require development to be compliant with it. We therefore recommend that this is modified to express that they should have regard to this document.</p> <p>The infrastructure requirements and deliverability of a proposal would be established through the course of considering a planning application and cannot be known at the time of submission. We therefore recommend the deletion of paragraph 8.</p> <p>Based on the above points, we recommend that the Policy is separated into two distinct policies, with paragraphs 9 – 11 separated into a policy titled "Housing allocations" and paragraph 1-8 reworded as a separate policy as follows:</p> <p><i>'Policy X: Windfall housing development</i></p> <p><i>Proposals for residential development on sites not allocated in Policy GDH1 will only be supported where, as appropriate to their nature, scale and location, the proposal:</i></p> <ul style="list-style-type: none"> • <i>is within the built-up area of the town, or it consists entirely of affordable housing or specialist housing for older people and is in accordance with relevant policies in the Development Plan;</i> • <i>does not result in the coalescence or unacceptable impact on the visual separation of</i> <ul style="list-style-type: none"> <i>i. Thame and Towersey, or</i> <i>ii. Thame and Moreton;</i> • <i>delivers connections to the existing network of walking and cycling routes, and is either within walking distance of a bus service or it provides scope to route new or extended bus services through the development site;</i>

Ref.	Section/Policy	Comment/Recommendation
		<ul style="list-style-type: none"> • <i>provides good access to services and facilities, being within walking distance of essential services and amenities, having particular regard to the catchment distances in Table 2;</i> • <i>provides for a safe and convenient access for all users to the highway network;</i> • <i>where required, is accompanied by a Transport Assessment or Transport Statement in accordance with Oxfordshire County Council standards and which has regard to the ‘Decide and Provide’ approach adopted by OCC; and</i> • <i>where required, is accompanied by a programme of archaeological evaluation to be agreed with Oxfordshire County Council and undertaken in advance of the proposal being determined. Subject to the findings of any evaluation, mitigation measures may be required that preserve features of archaeological interest on site.’</i>
6	Policy GDH1a: Land south of Wenman Road	<p>A reserved matters planning application (P23/S2269/RM) for this site has now received approval as of May 16th, 2024, following the approval of outline planning permission (P21/S0917/O) which granted permission for 57 dwellings. We recommend that the allocation for this site should tie in with the approved figure of 57 dwellings.</p> <p>Our landscape team recommend the inclusion of a requirement for street tree planting throughout the development, as found in Policy GDH1d. This would match the ambition found in Project NESG(a): Street Greening. We recommend a modification to paragraph 2(f) as follows:</p> <p><i>“Tree planting shall be provided along Wenman Road, screening new homes from this and adjacent employment areas. Streets within areas of development should also incorporate tree planting.”</i></p>
7	Policy GDH1b: Diagnostics Reagents	<p>We previously raised concerns in our pre-submission consultation response with the access to this site. We said that it may be problematic as access to the neighbouring Thame Fields site (Policy GDH1a) from Wenman Road was not permitted by OCC Highways and the reserved matters application for this site (P21/S0917/O) which has now been approved has not been designed to link into this allocation. Appropriate</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>access will need to be identified to ensure that the site is deliverable. We recommend that the Examiner seeks confirmation through the examination process from Oxfordshire County Council that they are supportive of the available access options to relating to this site.</p> <p>Paragraph 2(f) states that tree planting shall be retained along Wenman Road and new tree planting provided along the boundary with Chinnor Road and the eastern edge of the site. We recommend that this paragraph is reworded to ensure that it is clear that it may not be practicable to retain all trees during development and that new landscape planting would be expected at the boundary with Wenman Road to help soften and integrate any future development into the wider setting. Our landscape team also recommend the inclusion of a requirement for street tree planting throughout the development, as found in Policy GDH1d. This would match the ambition found in Project NESG(a): Street Greening. We therefore recommend the following rewording of paragraph 2(f):</p> <p><i>“f) Where practicable, tree planting shall be retained along Wenman Road and new tree planting provided along the boundary with Wenman Road, Chinnor Road and the eastern edge of the site, screening new homes from these and adjacent employment areas. The planting and landscape strategy shall have regard to the setting of the site at the edge of Thame and views across open countryside towards it. Streets within areas of development should also incorporate tree planting”</i></p>
8	Policy GDH1c: Land at Windmill Road	Figure 12 provides a concept plan for the site. This is largely consistent with the outstanding plans that have a resolution to grant for 31 affordable homes. The concept plan does include ‘landmark buildings’ on the key, which are not reflected on the figure or in the current proposals. We recommend that the key is modified to remove this text to ensure the Plan has the clarity required by the NPPF and to further align the masterplan with the permitted development.
9	Policy GDH1d: Land at Oxford Road	The Council raised a large number of concerns regarding this site in the pre-submission consultation. We are pleased to see that the Town Council have looked to address these concerns in their submission Plan. However, we do still have several outstanding concerns we wish to raise.

Ref.	Section/Policy	Comment/Recommendation
		<p>Paragraph 2(f) and 2(g) notes that there should be no net loss of open space on the site and that new areas of publicly open space of at least equal size and quality to any open space lost as a result of the development must be provided in an equally accessible location. We welcome this requirement, especially in terms of its consistency with paragraph 103 of the NPPF; however, any proposal for this site will also be expected to provide or contribute towards additional new open space in line with Policy CF5 of the South Oxfordshire Local Plan 2035. We therefore recommend a modification to paragraph 2(g) to ensure this is clear:</p> <p><i>“g) The provision of new areas of publicly open space in line with Policy CF5 of the South Oxfordshire Local Plan 2035 will be required. In addition to this, new areas of publicly open space, of at least equal size and quality to any existing open space lost as a result of development, must also be provided in an equally accessible location as part of the development. Where land is to be provided as open space this should not be located where users would be subject to unacceptable noise levels.”</i></p> <p>The Cuttle Brook Local Nature Reserve is identified as an important green space in Figure 26. Policy SF02 seeks to protect those areas such that their public value is retained. We recommend the addition of a reference to this policy in paragraph 2(d) to ensure it is clear how development in this area is expected to respond to the Cuttle Brook Corridor:</p> <p><i>“d) The development should minimise the impact of views along the Cuttle Brook looking north from Oxford Road and from the A418, minimising the impact on the landscape to the north of the site. The Cuttle Brook Corridor itself shall also be protected in line with Policy NEC1 and Policy SF02.”</i></p> <p>The Thame masterplanning document states that a generous buffer along the edge of this site will be required and that it is recommended that this is a minimum of 15m from the site boundary. We would welcome this is brought forward into the policy at paragraph 2(c):</p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>“c) Landscaped green corridors and noise mitigation measures shall be provided along the edges of the development areas, including screening to the A418. It is recommended that a buffer of at least 15m is provided from the A418.”</i></p> <p>Additionally, there is green shading shown within the view cone (Figure 15) and on the southern edge of the western development site, which is not referenced in the key, this should be clarified or omitted.</p>
10	Policy GDH1e: The Elms	<p>The application for 37 dwellings (P14/S2176/FUL) has now begun to be built out. As such, we recommend the allocated housing number for this site is modified to be 37 and that a minor modification is also made to the final sentence of paragraph 4.36 to reflect this:</p> <p><i>“The site is however retained in the Thame Neighbourhood Plan Review as construction on the site has begun but it has not yet been fully built out. developed but the principle of development remains.”</i></p> <p>Additionally, as a result of the scheme for 37 dwellings now having commenced, the scheme for 66 care home units (P20/S0928/FUL) can no longer be implemented. We therefore recommend the deletion of paragraph 4.37 in the supporting text to avoid confusion and ambiguity.</p> <p>We recommend that this policy is reworded so that it is consistent with the other allocation policies in the Plan, is set out to guide appropriate development, and makes a clearer reference to the extant permission (P14/S2176/FUL) to ensure the policy has the clarity required by the NPPF:</p> <p><i>“1. Land at The Elms, Upper High Street, Thame, as indicated in Figure 16, is allocated for 37 dwellings.</i></p> <p>2. Proposals for the sites will be supported where:</p> <ul style="list-style-type: none"> <i>a) the layout, scale and massing of development is consistent with the extant permission for 37 dwellings (P14/S2176/FUL), unless good urban design reasons can be demonstrated that justify an alternative approach;</i> <i>b) the siting of development is sensitive to the setting of the Grade II listed Elms building and adjacent parkland;</i>

Ref.	Section/Policy	Comment/Recommendation
		<p>c) <i>vehicular access is provided via Elms Road with new pedestrian and cycling links providing access to the site from Upper High Street;</i></p> <p>d) <i>development is coordinated with improvements at the adjacent Elms Park in a manner consistent with the extant permission for 37 dwellings (P14/S2176/FUL)."</i></p>
11	Policy GDH2: Housing type, tenure and mix	<p>We have concerns that the Housing Needs Assessment (HNA) and Policy GDH2 considers Thame's housing needs in isolation rather than as part of a district-wide picture, particularly with regard to the management of affordable housing need and homelessness. Policy H11 of the South Oxfordshire Local Plan 2035 sets out that the mix of housing on a given development should have regard to the Council's latest evidence and Neighbourhood Development Plan evidence for the relevant area. We therefore recommend that the policy acknowledges Policy H11 of the South Oxfordshire Local Plan 2035 and sets out that development should have regard to the HNA and the Council's latest evidence. We then recommend consequential amendments to the existing policy wording to ensure that it is clear that proposals should have regard to the policy, rather than stating this to be a requirement.</p> <p>Our Affordable Housing Team also note that Policy GDH2 and the HNA reflects a rigid and subjective picture of housing need in Thame to 2035 and the picture of housing need had changed considerably between HNA publication (March 2022) and the point of submission (June 2024), especially in terms of the need for rented tenures. This matter is acknowledged in the HNA Addendum. We recommend that Policy GDH2 aligns more closely with Policy H9 of the South Oxfordshire Local Plan in regard to the rented tenure element, including the requirement for the delivery of First Homes as set out in the First Homes Interim Policy Statement 2022.</p> <p>In line with the above modifications, we recommend that the policy be reworded as follows:</p> <p><i>"1. Proposals for residential development should have regard to the Council's latest evidence on housing mix, as per Policy H11 of the South Oxfordshire Local Plan 2035, as well as the findings and recommendations of the Thame Housing Needs Assessment (HNA), including:</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p>a) On developments of ten or more homes, 40% of those homes must should comprise affordable housing.</p> <p>b) Provision of affordable homes should be split such that 65% takes the form of rented tenures, including 35% takes the form of social rented tenure, and 25% takes the form of affordable rented tenure, 25% takes the form of First Homes, while the remaining 3515% comprises affordable routes to home ownership. Priority is to be given to the delivery of affordable rented tenures in the early years of the Plan period.</p> <p>c) All developments in Thame of ten or more homes are required should, where viable, provide First Homes at a discount of 50%.</p> <p>d) Shared Ownership schemes at a discount of between 10% - 25% are also considered appropriate.</p> <p>e) All affordable homes, including First Homes, should be designed such that they are tenure-blind (i.e.: they should be integrated into the design of the overall proposed development and be of an equal quality in terms of design and use of materials compared to the market housing element).</p> <p>f) At least 65% of all new homes should comprise 1-3 bed properties.</p> <p>g) Where smaller homes are proposed the delivery of flats should be prioritised.</p> <p>h) Proposals for development that meets the need of the ageing population (specialist housing) will be supported. The tenure split of specialist housing developments should comprise 60% market homes and 40% affordable homes.</p> <p>i) Where specialist housing is proposed it should be located within easy access of shops, facilities and public transport services. Housing should be well integrated within the wider neighbourhood and be designed in accordance with the HAPPI principles.</p> <p>j) Support will be given to proposals for new homes that are designed to be adaptable to meet the future accommodation needs of occupiers at different stages of their lives”</p>
12	Policy GDE1: Land at Rycote Lane	We note that the Town Council have responded to comments raised on this Policy during the pre-submission consultation through modifications made to the Neighbourhood Plan; however, we still have

Ref.	Section/Policy	Comment/Recommendation
		<p>concerns regarding the proposed site in the supporting Masterplan Report – please see our comment at Ref.28 for more information relating to this.</p>
13	Policy GDR1: Cattle Market site	<p>The current wording of the policy places a strong emphasis on retaining car parking provision on the site. As a result of this, 4 out of the 8 paragraphs refer to parking.</p> <p>Paragraph 1 and paragraph 3 appear to conflict with each other. Paragraph 3 of the policy allows for the loss of car parking spaces subject to justified evidence, whereas paragraph 1 states that the overall quantum of parking on the site shall be retained. We recommend that paragraph 3 is retained, and paragraph 1 is deleted as the approach set out in paragraph 3 is less prescriptive and will allow for the land to be used effectively in line with the NPPF.</p> <p>The policy currently sets out what uses would be appropriate on the site in paragraph 4. The changes made to use class order in 2020 are intended to offer more flexibility. We therefore recommend that the policy is modified to make it less prescriptive by removing references to the specific use classes. We also recommend that this paragraph is modified to set out that the uses listed may be appropriate, to ensure the policy provides flexibility and consistency with paragraph 5 which states that the mix of uses will be determined through the planning application process.</p> <p>Policy GAM1 sets out that “Development proposals are encouraged to incorporate and help deliver a network of mobility hubs across Thame.” On this basis, we recommend that paragraph 7(f) is modified to set out that a mobility hub would be encouraged on this site rather than required. This modification will ensure that the policy remains non-prescriptive in terms of uses for the site, as set out in paragraph 5 of the policy, and ensure the policy wording is consistent with that found in Policy GAM1. Similarly, we recommend that the requirement for the development to allow for the retention of the Racquet’s Club in paragraph 7(h) is modified to recognise that this should be applied in accordance with Policy CF4 of the South Oxfordshire Local Plan 2035 which seeks to protect, maintain and where possible enhance existing recreational facilities and only allows for their loss under certain conditions.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>We recommend that this policy is restructured and reworded so that it is consistent with the other allocation policies in the Plan, takes account of the South Oxfordshire Local Plan 2035, and to ensure it clearly sets out the type of development that would be suitable on the site:</p> <p><i>‘1. The development of the Cattle Market site (Figure 19) for a mix of uses will be supported once a new cattle market site is operational within Thame.</i></p> <p><i>2. The mix of uses will be determined through the planning application process but should include provision of 1,500sqm net convenience retail floorspace, in line with Policy TC4 of the South Oxfordshire Local Plan 2035, unless up-to-date evidence of retail needs and requirements is provided that justifies an alternative level of provision. A large footprint superstore is not appropriate for the site.</i></p> <p><i>3. Additional uses which may be appropriate on this site include:</i></p> <ul style="list-style-type: none"> <i>a) Convenience retail floorspace;</i> <i>b) Civic or Community facilities;</i> <i>c) Residential;</i> <i>d) Office floorspace; and</i> <i>e) Hotel accommodation.</i> <p><i>4. Proposals for development of the Cattle Market site will need to provide parking in line with standards established by OCC.</i></p> <p><i>5. Proposals that result in a loss of existing car parking spaces will need to be justified by evidence of car park utilisation across the town centre, demonstrating that sufficient alternative parking provision is available to offset any loss, and include proposals that relocate space for parked vehicles associated with businesses operating in the Charter Market.</i></p> <p><i>6. Proposals for this site will be supported where they have regard to the principles established in the Thame Masterplanning Report (Appendix 1), including:</i></p> <ul style="list-style-type: none"> <i>a) Development must create a positive building frontage onto North Street that respects the character and scale of the surrounding area, including the Conservation Area.</i>

Ref.	Section/Policy	Comment/Recommendation
		<p>b) <i>Development must be designed to respond to views northwards along North Street, so creating a visual link between it and the High Street.</i></p> <p>c) <i>Pedestrian routes through the Cattle Market site must be designed to provide a direct and attractive link to the existing pedestrian routes next to Barley Hill Primary School. Routes should be well overlooked and defined by new development.</i></p> <p>d) <i>Existing residential dwellings overlooking the northern boundary of the site must be positively integrated into the proposals. New tree planting shall be provided along site boundaries to create a soft edge between development.</i></p> <p>e) <i>A ‘civic’ open space is encouraged within the development, overlooked by active building frontages, incorporating tree planting, space for food growing and opportunities for outdoor activities and events.</i></p> <p>f) A mobility hub (see Policy GAM1) is encouraged to be incorporated within the site.</p> <p>g) <i>Residential uses proposed as part of the development can be provided on upper storeys where they are complementary with other ground floor uses.</i></p> <p>h) The layout of development shall allow for the retention of the Racquet’s Club, unless it can be demonstrated that the loss of the facility would be acceptable in accordance with the criteria set out in Policy CF4 of the South Oxfordshire Local Plan 2035</p> <p><i>7. The application material submitted with proposals for development must show how any disruption to the adjacent school from noise and dust or vehicle movements during the construction period will be minimised.’</i></p>
14	Policy GDR1: Cattle Market site – Comments from the Council’s Property Team	<p>In relation to this site, the council’s Property Team made the following comments:</p> <p><i>“The Place and Strategic Property teams of SODC have reviewed the Thame Neighbourhood Plan (TNP2) 2020-2041 – Submission Version April 2024 prepared by Thame Town Council and the accompanying Thame Masterplanning Report April 2024. Our focus has been on draft Policy GDR1</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p data-bbox="603 237 1374 304"><i>relating to the Cattle Market site (“the site”) which is owned by South Oxfordshire District Council (SODC).</i></p> <p data-bbox="603 344 1382 412"><i>We have the following comments on Policy GDR1 and the supporting text:</i></p> <ul data-bbox="651 452 1382 1986" style="list-style-type: none"> <li data-bbox="651 452 1382 707"><i>- We are pleased to note that a non-prescriptive approach to guiding future development of the site has generally been adopted with the mix of uses to be determined through the planning application process and a balance to be struck in the design and content of a scheme between on-site parking and active travel promotion.</i> <li data-bbox="651 707 1382 927"><i>- However, there are some points of clarification and some further tweaks suggested to ensure non-prescription, clarity and consistency with the supporting text and the principles for the approach to design set out for the site in the Thame Masterplanning Report.</i> <li data-bbox="651 927 1382 1986"><i>- Parking - we are concerned that there appears to be an emphasis on car parking retention at the site above all other considerations. The first three points of the policy relate to parking and Clause 1 seeks to retain the overall quantum of town centre car parking on site as part of any development scheme. Clause 2 references any parking provision associated with new development being in line with Oxfordshire County Council’s parking standards but states “the existing parking spaces on the site will not count towards the requirement for any new parking that is generated” which seems confusing. Clause 3 of the policy on the other hand seems to allow for a loss of parking provision on site as long as a rationale can be provided and evidenced in the context of the parking provision across the town centre. Clause 3 represents our preferred approach, particularly as SODC has declared a climate emergency and is seeking to promote sustainable forms of transport in new developments across the district. The last part of Clause 3 “.....and include proposals that relocate space for parked vehicles associated with businesses operating in the Charter Market” is confusing as new development proposals will only come forward if and when the Charter market relocates off-site.</i>

Ref.	Section/Policy	Comment/Recommendation
		<ul style="list-style-type: none"> - <i>This mis-placed emphasis on parking provision is further supported at the beginning of Clause 4 which covers the potential mix of uses and begins “Subject to parking provision being satisfied (as set out in Clauses 1 – 3), proposals for development”.</i> - Potential Uses – Clause 4 states that “proposals for development will be supported which include some or all of the following uses: <ul style="list-style-type: none"> a) Convenience retail floorspace (Use Class E(a)). b) Civic or Community facilities (Use Class E(e), E(f) F1 and F2). c) Residential (Use Class C3). d) Office floorspace (Use Class E(c)). e) Hotel accommodation (Use Class C1) - <i>These uses are fine in themselves, but we do not understand why the specific use classes have been restricted in some cases and we suggest that they are broadened to cover as wide a range of uses as possible in response to market opportunities at the time of a planning application. We would also request that the word “may” is inserted before “include some or all.....”, again to avoid prescription.</i> - <i>Clause 5 relates to a scheme including “provision of 1,500sqm net convenience retail floorspace, unless up-to-date evidence of retail needs and requirements is provided that justifies an alternative level of provision”. This caveat is is welcomed.</i> - Timing – Clause 6 states that “Development will only be supported on this site once a new cattle market site is operational.” which emphasises the link between the relocation of the Charter market and new development taking place. - Design – Clause 7 sets out a series of design principles contained within the Thame Masterplanning Report. These are generally welcomed but we have specific comments on the following sub-clauses: <ul style="list-style-type: none"> - <i>“(f) A mobility hub (see Policy GAM1) shall be incorporated within the site.” We would prefer this to state that “every effort shall be made to explore the potential for a mobility hub to be incorporated within the site” or similar. Again, we are trying to be realistic about delivery opportunities and risks and to be non-prescriptive.</i>

Ref.	Section/Policy	Comment/Recommendation
		<ul style="list-style-type: none"> - <i>“(h) The layout of development shall allow for the retention of the Racquet’s Club. The arrangement of buildings should successfully integrate this as part of the development” It should be stated that this clause should only apply if the Racquets Club is still located and operational on the site at the time of a planning application being submitted.</i> - Site Definition – <i>for clarity, the red line in Figure 19 appears to differ from the extent of the site within SODC’s ownership. Please see the attached title plan showing SODC’s ownership.</i> - Supporting Text – <i>we note that Paragraph 4.15 under “Housing Sites” states “Initial consultation work undertaken for TNP2 suggested that the site might be able to accommodate 15 new homes as part of a mixed use development, although masterplanning work and calculations undertaken by SODC and Vale of White Horse in the 2024 Housing and Economic Land Availability Assessment prepared as part of the emerging Local Plan indicate this could be higher” We are unclear on the background to the number of homes mentioned but in any event we note that there is no reference to any quantum of housing in draft Policy GDR1 which we support, again to present a non-prescriptive policy to guide development on the site.”</i>
15	Policy GDR2: Town Centre Use	<p>We have some concerns about the framing and contents of this Policy. We recommend that the policy takes a less prescriptive approach to determining which use classes are appropriate in various areas of the town. Changes were made to the use class order in 2020, in part with the aim of allowing more flexibility. As currently written, this policy does not provide this flexibility or recognition that many of the specific uses listed are able to change their use without applying for planning permission. It also does not reflect the changing nature of town centres and providing such a high degree of specificity could lead to the policy becoming quickly outdated.</p> <p>We therefore recommend that the Policy is modified to make it less prescriptive by removing references to the specific use classes and instead refer to ‘main town centre uses’ as defined by the NPPF. We also recommend that it is made clear that the policy only</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>has effect on occasions where planning permission is required. This will ensure that the policy seeks a positive approach towards the growth of Thame Town Centre, as set out in Paragraph 90 of the NPPF.</p> <p>Additionally, the policy and Figure 21 currently make references to secondary retail frontages. There is no longer a specific requirement to identify primary and secondary frontages in the NPPF. The Government has confirmed that the removal of the requirement to define primary and secondary frontages reflects the general need to be flexible in planning for the future of town centres due to the rapid changes taking place in the retail and leisure industries. We therefore recommend that Policy GDR2 and Figure 21 are modified to remove these references.</p> <p>The council, working with the Vale of White Horse, recently jointly commissioned a Town Centres and Retail Study (December 2023). This document forms part of the evidence for the emerging Joint Local Plan preferred options, which recently was consulted on as part of a Regulation 18 Part 2 consultation. As part of the study, consideration was given to the Town Centre Boundaries and Primary Shopping Area boundaries in the South Oxfordshire Local Plan 2035. The updated Study proposes an amendment to the Town Centre Boundary to remove non-main town centre uses, and recommends that the Primary Shopping Area boundary stays as it is currently in the South Oxfordshire Local Plan 2035.</p> <p>We note that the primary retail frontage, as shown on Figure 21, is similar to the Primary Shopping Area produced as part of the study, but contains a number of differences, most noticeably the inclusion of the Cattle Market site to the northeast. The NPPF defines a Primary Shopping Area boundary as a 'defined area where retail development is concentrated'. As there is no current concentration of retail development in the Cattle Market area, we recommend Figure 21 is redrawn using the latest evidence from the Town Centres and Retail Study to inform the boundary of the Primary Shopping Area identified in the plan.</p> <p>As a result of the above comments, we recommend the following rewording of the policy:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>“1. When planning permission is required, proposals for new retail or other main town centre uses, as defined by the NPPF, should follow a ‘town centre first’ approach, as set out in Policy TC2 of the South Oxfordshire Local Plan 2035.</p> <p>2. Within the Town Centre boundary (as defined on Figure 21) proposals should, where appropriate, incorporate a mix of complementary uses consistent with the role, function and character of the centre.</p> <p>3. Within the Primary Shopping Area (as defined on Figure 21), and when planning permission is required, the following uses would be considered appropriate:</p> <p>a) on the ground floor</p> <ul style="list-style-type: none"> - retail; - financial and professional services; - cafes and restaurants; - leisure; - drinking establishments; - community facilities - employment <p>b) on upper floors</p> <ul style="list-style-type: none"> - office space - community facilities - residential <p>4. Hot food takeaways and betting shops may be appropriate on the ground floor within the Primary Shopping Area where they:</p> <p>a) mitigate any detrimental impacts of their use, such as in respect of litter, commercial waste, dirty pavements and noise;</p> <p>b) when relevant, provide adequate extraction and air condition which does not cause nuisance by way of noise or odour to residents living above or close to the proposed use, and where the impact of extraction and air conditioning on the appearance of buildings and townscape is minimised; and</p> <p>c) when relevant, ensure that collection and delivery vehicles to not cause obstruction to pedestrians or other road users.</p> <p>5. Other uses may be appropriate within the Primary Shopping Area where the proposed new use would not have an adverse impact on the vitality and viability of the centre as a whole.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p data-bbox="603 271 1390 416">6. <i>The use of the ground floor of vacant premises on a temporary basis within the Primary Shopping Area for new retail or other main town centre uses will be supported.</i></p> <p data-bbox="603 454 1358 600">7. <i>Proposals for development in the town centre that enhance the attractiveness of the public realm and which improve the quality of the pedestrian environment will be supported.”</i></p> <p data-bbox="603 638 1358 712">We also recommend the following modification to the supporting text based on the above comments:</p> <p data-bbox="603 750 1390 1223"><i>“4.72 The extent of Thame Town Centre is defined in the Local Plan and illustrated in Figure 21, The Local Plan also defines a primary retail area, focused on that part of the High Street between the junction with Bell Lane and Swan Walk (just beyond the junction with North Street). It also extends along Greyhound Walk to include Waitrose. This is reflected in the Neighbourhood Plan, although with an extension of the primary retail area along North Street to the Cattle Market added to this, recognising the potential for future development here and seeking to integrate this with the main retail and service function of the Town Centre.</i></p> <p data-bbox="603 1261 1385 2024"><i>4.73 Where planning permission is required, proposals for new retail uses should follow a ‘town centre first’ approach, as set out in Policy TC2 of the South Oxfordshire Local Plan 2035. are encouraged to locate within primary retail areas Figure 21 identifies the town centre boundary and primary retail frontage, which includes the High Street and the Butter Market. Other supporting uses within the town centre that would be considered appropriate include leisure and entertainment, office floorspace, cultural activities, community uses and residential development. Other town centres uses, including sui generis uses such as hot food takeaways and betting shops, may be appropriate within the town centre where they are most appropriately located in secondary retail areas, retaining the primacy of the ‘High Street’. Such uses can undermine the vitality and viability of the main retail areas and be detrimental to public health. The presence of and proposals for such uses will need carefully managing managed to avoid</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>detrimental impacts and conflicts between uses and the visitor experience of the town centre.”</i></p> <p>We also recommend the following modifications to Figure 21:</p> <ul style="list-style-type: none"> - <i>Revision to the Primary Retail Frontages using the latest evidence from the Town Centres and Retail Study Town Centres and Retail Study (December 2023)</i> - <i>Delete Secondary Retail Frontages</i> - <i>Rename Primary Retail Frontages as Primary Shopping Area</i>
16	Policy CPQ1: Design in Response to Local Character	<p>We recommend a small modification to paragraph 2(h) to specify that boundary treatments should be secure and of a high quality, in line with Joint Design Guide, to avoid close boarded fences in areas which would be inappropriate:</p> <p><i>“h) Boundary treatment: Boundary treatments along the frontage of the scheme should be secure, of a high quality and reflect the immediate area.”</i></p>
17	Paragraph 5.13 – Page 68	<p>The current phrasing of Paragraph 5.13 and the attached bullet point list of design principles located in the supporting text on page 68 reads like policy wording. We recommend that it is made clear that the items in the list provided are objectives for the policy:</p> <p><i>“Proposals for new employment development should reflect good practice design principles with regard to access, frontages, general arrangement of uses and relationship with surrounding uses. They should create places that are conducive to work, providing a range of employment types suitable for different businesses, whilst reflecting the following objectives for Thame:...”</i></p>
18	Policy CPQ2: Design Principles for Employment Development	<p>We recommend paragraph 2 is reworded to set out that the principles should be applied on a proportionate basis to enable the policy to be applied effectively during the development management process, therefore ensuring the policy has the clarity required by the NPPF:</p> <p><i>“2. As appropriate to their scale, nature and location, proposals should reflect the following principles:...”</i></p>
19	Policy CPQ6: Street Hierarchy	<p>We consider the requirement that “proposals for development shall help facilitate infrastructure improvements identified in the forthcoming Thame</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>LCWIP” in paragraph 4 of this policy is unduly onerous and not in general conformity with the NPPF. NPPF paragraph 57 states that:</p> <p>“Planning obligations must only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. <p>As the document discussed is a forthcoming document, it would not meet these tests. We therefore recommend that this paragraph is reworded to encourage proposals to look to achieve this rather than requiring it:</p> <p><i>“4. Proposals for development are encouraged to help facilitate infrastructure improvements identified in the forthcoming Thame LCWIP.”</i></p>
20	Policy NEB1: Biodiversity	<p>There is an opportunity to enhance the clarity of paragraph 1. The reference to the mitigation hierarchy in the Local Plan lacks clarity and could be enhanced to avoid ambiguity. There is also reference half-way through the paragraph that this policy should be applied to large and small sites, except householder developments. We recommend that this is brought to the start of the policy to bring the clarity required by the NPPF.</p> <p>Additionally, we note that whilst paragraph 2 of this policy sets out that there is a strong presumption in favour of biodiversity net gain occurring on site. However, paragraph 1 states that: “Development proposals will be assessed in terms of the mitigation hierarchy in the Local Plan and <i>must secure a minimum net biodiversity gain of 10% on-site...</i>” As such, paragraph 1 is in conflict with paragraph 2 as it does not give this flexibility for the biodiversity net gain to be delivered off site. We therefore recommend that the words “<i>on site</i>” are removed in paragraph 1.</p> <p>The requirement that a biodiversity net gain plan be submitted as part of planning application material in paragraph 1 is unduly onerous. The council has validation checklists which include the requirements for planning applications relating biodiversity reports/assessment. To avoid the document being</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>updated multiple times throughout the application process, these documents are usually not requested until the application has been approved. We recommend that this requirement is replaced with one that requires suitable information to be provided with the application to demonstrate that 10% biodiversity net gain is possible.</p> <p>In regards to the above three comments, we recommend a rewording and restructuring of paragraph 1 as follows:</p> <p><i>“1. This policy applies to large and small sites, except householder developments. Small sites should make use of the Small Sites Toolkit published by Natural England as part of the biodiversity metric where relevant.</i></p> <p>2. The impact of development proposals on biodiversity will be assessed in accordance with the mitigation hierarchy as set out in Policy ENV3 of the South Oxfordshire Local Plan 2035.</p> <p><i>3. Development proposals must secure a minimum net biodiversity gain of 10%, as demonstrated through use of the most up-to-date version of the Natural England biodiversity metric (or any successor document to this). Proposals are expected to provide suitable information to demonstrate that a 10% biodiversity net gain is achievable. This will be informed by current site conditions and with any proposed habitat creation being appropriate to the site and immediately surrounding area.”</i></p> <p>We also consider the requirement that “swift and bat boxes shall be integrated into all new buildings...” is unduly onerous. The Government debated on a petition for swift boxes to be made compulsory for new housing in July 2023 (CDP 2023/0126) and concluded that particular forms of green infrastructure, such as swift bricks, were not suited to all developments and that both local authorities and developers should aim to understand the natural characteristics of each site, and to take proportionate and reasonable action relevant to that location. We recommend that this paragraph is reworded to encourage proposals to look to integrate swift and bat boxes where appropriate:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>“7. As appropriate to their scale, nature and location, proposals for new buildings and extensions to existing buildings are encouraged to identify opportunities to integrate appropriate measures for enhancing and maintaining biodiversity and wildlife, such as the inclusion of swift bricks and bat boxes.”</i></p>
21	Policy NEC1: The Cuttle Brook Corridor	<p>We recommend a slight rewording to paragraph 1 to ensure it is clear that the Cuttle Brook Nature Reserve is not being defined by the Plan (as this is already a designated area), and that Figure 28 is intended to define the Cuttle Brook corridor:</p> <p><i>“Any development proposals within the Cuttle Brook corridor, including the Nature Reserve, as defined on Figure 28, must ensure that the north-south green corridor through Thame is retained. Development should:...”</i></p> <p>We recommend paragraph 2 is reworded to set out that the principles should be applied on a proportionate basis to enable the policy to be applied effectively during the development management process, therefore ensuring the policy has the clarity required by the NPPF.</p> <p>Additionally, whilst our Ecology Team welcome the final sentence of paragraph 7.16 in the supporting text, especially in relation to the comments raised above on Policy GDH1d, they would encourage this to be added into the wording for Policy NEC1 to ensure it is clear that any development at the site covered by Policy GDH1d or any future proposals are expected to mitigate any impacts on the nature reserve. We would also welcome reference to Policy ENV2 in the South Oxfordshire Local Plan.</p> <p>As a result of the above comments, we recommend the following rewording of paragraph 2 of the Policy:</p> <p><i>“2. As appropriate to their scale, nature and location, development proposed adjacent to the Cuttle Brook corridor (as defined on Figure 28) should incorporate green links that connect with the corridor. Where development is identified to have an impact on the Nature Reserve, for example, through increased recreational use, hydrological or air quality changes, these impacts will need be</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>mitigated by the applicant in line with Policy ENV2 of the South Oxfordshire Local Plan 2035.</i></p> <p>We recommend a modification to Figure 28 to ensure it is clear that the Cuttle Brook corridor encompasses the Cuttle Brook Nature Reserve. We suggest that this could be done by showing both the boundary of the corridor and of the Nature Reserve where these are congruent. The District Council would be happy to assist with this if required.</p> <p>There is also an opportunity to make Figure 28 more consistent with the concept masterplans found elsewhere in the Plan, especially Figure 15 for the site Land at Oxford Road. We recommend that the boundary of the Cuttle Brook corridor is modified to take account of the shape of the area marked for development on Figure 15.</p>
22	Policy GAAT1 – Active Travel	<p>We note that there are a number of references to external documents in this policy. As these documents are intended as guidance and have not been examined, the policy cannot require development to be compliant with them. We also encourage paragraph 2 of the policy to set out that it should be applied on a proportionate basis. We therefore recommend the following modifications to the policy:</p> <p><i>“d) Reflect best practice principles for active travel design with the design of new cycle routes having regard to the guidance set out in DfT Cycle Infrastructure Design LTN 1/20, or successor guidance, as well as DfT guidance in respect of inclusive mobility., shall also be utilised by Applicants should also have regards to the principles established in Building for a Healthy Life to inform the design of safe, attractive and effective active travel infrastructure and, where possible, improve conditions for all.”</i></p> <p><i>“2. As appropriate to their scale, nature and location, proposals should include cycle parking which has regard to DfT LTN 1/20 and the OCC Cycling Design Standards and, where appropriate:</i></p> <p><i>a) proposals for residential development shall provide secure cycle storage assigned to the dwelling and located within or immediately adjacent to the property, fully covered and at ground-level.</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p>b) <i>proposals for flats should include communal areas for cycle storage.</i></p> <p>c) <i>proposals for commercial, leisure and community uses should support and enable active travel through inclusion of safe, secure, dry and convenient cycle parking and changing facilities.”</i></p> <p><i>“3. New streets provided within areas of growth and development should have regard to the transport user hierarchy as set out in the OCC Local Transport and Connectivity Plan, and seek to avoid conflicts between different users.”</i></p>
23	Policy GATCP1: Town centre parking	As with Policy GDR1, there appears to be a conflict in this Policy by suggesting that the overall quantum of parking must be retained (paragraph 1) whilst also supporting certain development that results in the loss of parking spaces (paragraph 3). We recommend that paragraph 3 is retained and paragraph 1 is deleted as the approach set out in paragraph 3 is less prescriptive and will allow for the land to be used effectively in line with the NPPF.

Masterplan Comments

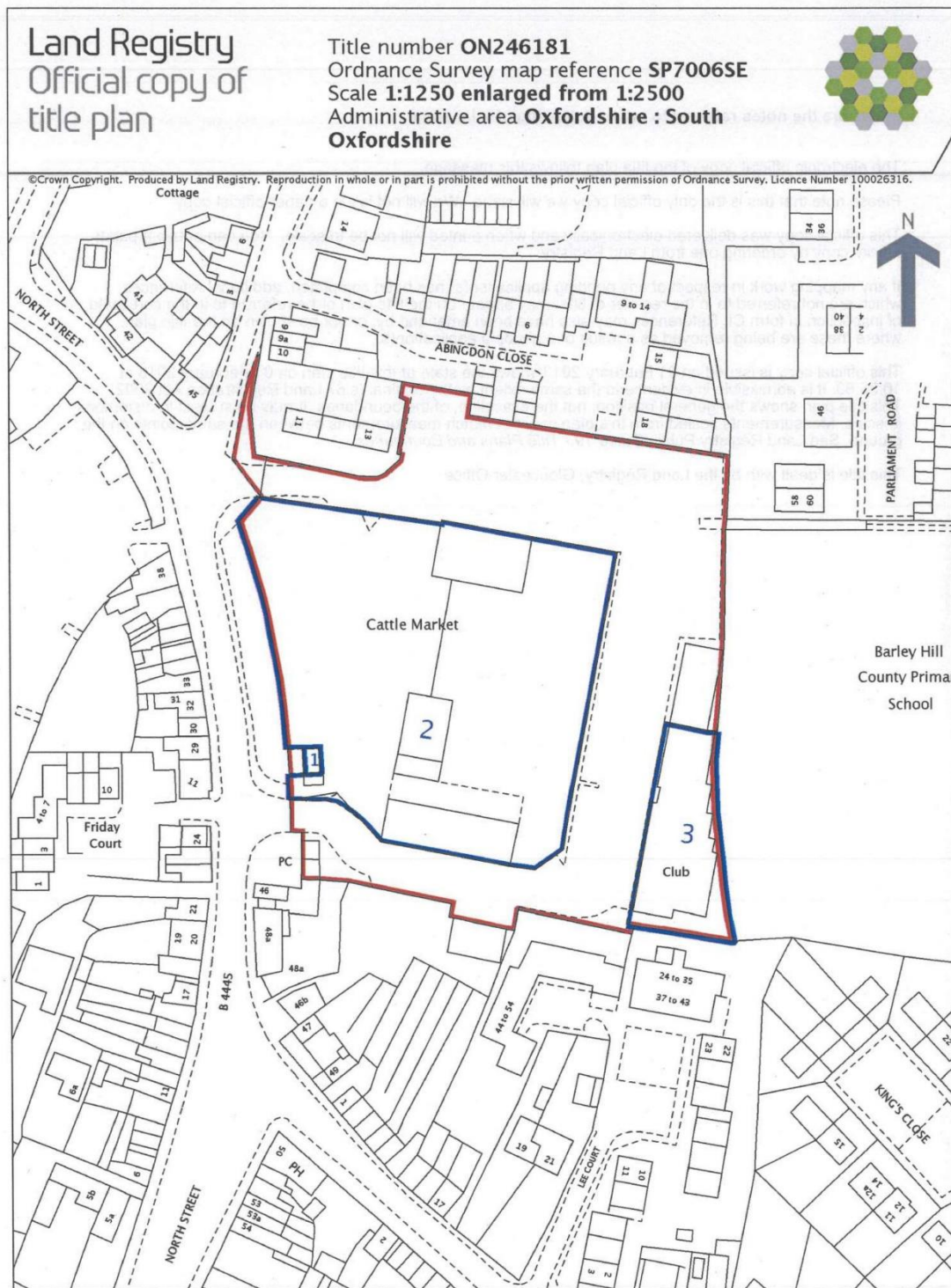
24	General Comment	The Masterplan incorrectly references the latest version of the NPPF as July 2023. This should be corrected to December 2023 (or to a later update – there may be a further updates to the NPPF from government shortly)
25	Page 18	The Street Design Guide is an Oxfordshire County Council document and not a South Oxfordshire District Council document. This should be corrected.
26	Page 32	This section currently refers to ‘The South Oxfordshire District Council (SODC) Design Guide,’ This should be replaced with reference to the Joint Design Guide instead as this document has now superseded the former.
27	Oxford Road	Our Landscape team recommend that the Masterplan for this development is modified to show planting on the edge of the development, to screen new and existing housing in views from the north.
28	Rycote Lane	As stated in comment Ref.12, we note that the requirement for buildings to be one or two storeys on this site, which was included in the pre-submission version of the Plan, has now been omitted which we support. However, the masterplanning document states that buildings should be no more than 3 storeys for B1/2 uses and two storeys for a larger footprint. This is considerably higher than the previous draft policy

		<p>requirement for one and two storeys. The site is elevated and open and in a sensitive location at the entrance to Thame, albeit close to the Menlo estate. The masterplanning document does indicate that building heights will need to be low in the most elevated areas, with ridge heights below those in the Menlo Estate, but it is not stated clearly what these are.</p> <p>A storey does not always mean the same thing for commercial/employment purposes as it does for residential properties. As such, we recommended that rather than setting height limits in storeys, which can vary significantly depending on the use, it would be better to specify the height limits in metres. This will also help to alleviate concerns with the landscape impact of this site which could conflict with the requirements of Local Plan policies such as ENV 1.</p>
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Design Code

29	Page 108	In section SC 03.01- BS5837 is referred to, naming an outdated version. The code should refer to BS5837:2012 Trees in relation to design demolition and construction.
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Appendix 1 – Land Registry Plan for Cattle Market Site (See comment Ref.14)



This official copy is incomplete without the preceding notes page.

Response 43: ID ANON-MT75-C6HE-K

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 10:26:41

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Kevin Wallis

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The Plan appears to be comprehensive and well-thought-out. I am in support of the Plan and would like to see it officially adopted.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

[REDACTED]

Response 44: ID ANON-MT75-C6HJ-R

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 10:39:23

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

mr

Name:

Simon Bingham

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We strongly object to the GDH1d proposal for the development of 100 households at Oxford Road due to the loss of safeguarded and designated green open space, increased flooding and impacts on landscape, loss of wildlife, biodiversity, and a deficient transport assessment for the following reasons:

1. The area proposed for development is a flood plain particularly the eastern parcel. The current flood risk assessment suggests that the 100 year +30% line is below the line of houses.

However recent flooding (Dec 23/ Jan 24) pictures and drone footage, overlaid on this line, suggest the flooding already reaches these proposed houses before they have been constructed. This throws significant concerns over the accuracy of the modelling undertaken and does not consider the potential impact of this and other developments of increased flooding of houses and gardens here and elsewhere along the river downstream of the development.

2. Water and Sewerage are to be supplied and dealt with by Thames Water, who are already struggling to provide water to the town, and whom during recent flooding events pumped raw sewerage into the local river for over 50 hours. There have also been multiple sewerage spills over roads and into gardens in the current Thame Meadows estate, so the current pumping station is clearly no able to support the current development let alone an additional 100 houses. This may well be compounded by the propensity of the area to flooding.

3. Thames Water in their response to the Planning Application stated that there is an inability of the existing water infrastructure to ... accommodate the development proposal .

4. The area to be built on is designated 'accessible open space'. A legal agreement between the developer and the District Council (the previous S106) was put in place to prevent development on this open space when the Thame Meadows Estate was built. The current neighbourhood plan specifically states this area should not be developed and left as open space. It should be used to extend the Cuttlebrook Nature Reserve (CNR), so reducing pressure on the currently over utilised area of CNR.

5. The current open space provides homes and green space to an array of wildlife species. The current plans destroy multiple historic hedgerows which

house, feed and protect these species including kingfishers, woodpeckers, bats, hedgehogs, fieldfare, water voles, grass snakes, deer, otters, many other types of birds, and newts. It also is the site of a historic ridge and furrow field in the area which would be severely impacted, if not destroyed.

6. The transport assessment, whilst an improvement on that in the withdrawn application, still does not seem to use the observed trip distribution of traffic from Thame Meadows (from the MCC) rather reverting to the now out of date 2011 census particularly given the impact of the COVID19 pandemic and its impact on travel patterns. Whilst the assessment may not breach the impact threshold (assumed at 85% RFC) delays and queuing impacts will be significantly increased with the near doubling of the development. The increase in traffic will increase the risk, significance and occurrence of accidents resulting in personal injury in the locality.

7. Parking on the roadside of Weavers Branch and elsewhere in the development currently causes issues with forward sight distance to oncoming vehicles, weaving between those parked cars and the volume of traffic. With additional HGV construction and residential traffic, the route will be impassable resulting in increased safety concerns and accident risk.

8. Within the proposed plans submitted it is not clear if green space is found separating the current development from the new development. The protection of green space between developments was evident on the withdrawn application but has now been removed with the removal of hedgerows between the eastern edge of Phase 1 and houses potentially fronting directly onto and accessed from Weavers Branch in the revised Phase 2 application. This is in direct conflict with the Thame Neighbourhood Plan, other information the developer submitted, and not in keeping with all previous new developments in Thame.

In conclusion this particular area adjacent to Thame Meadows was designated as open Space, not to be developed as part of the Thame Neighbourhood Plan and current planning permission (based on the S106) and should remain as such given its propensity to flooding and as a haven for wildlife. Allowing the possibility of development on this designated and legally binding Public Open Space (subject to significant repeated flooding and being on the boundary of the Cuttlebrook Nature Reserve) is against the whole ethos of the TNP2 and should be rejected

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

No further additional development at the north of Oxford Road site

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 45: ID ANON-MT75-C6HM-U

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 11:57:55

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Chair

Organisation (if relevant):

Swifts Local Network: Swifts & Planning Group

Organisation representing (if relevant):

Address line 1:

████████████████████

Address line 2:

Address line 3:

Postal town:

██████████

Post code:

██████████

Telephone number:

Email:

████████████████████

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Policy NEB1: Biodiversity item 7 (Swift and bat boxes...) is very welcome to implement national policy guidance, but we request to be sound and effective that the following is added for clarity:
", specified and installed in accordance with best-practice guidance such as BS 42021."

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Please add to Policy NEB1: Biodiversity item 7 (Swift and bat boxes...):

", specified and installed in accordance with best-practice guidance such as BS 42021."

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 46: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 12:02

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Planner

Organisation (if relevant):

RPS Group

Organisation representing (if relevant):

CALA Homes

Address line 1:

20 Western Avenue

Address line 2:

Milton Park

Address line 3:

Abingdon

Postal town:

Post Code:

OX14 4SH

Telephone number:

01235 821 888

Email:

[REDACTED]@rps.tetrattech.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam

Please find attached to this email a set of representations, which are submitted on behalf of CALA Homes.

Attached to this email are the following:

1. Planning representations by RPS Group
2. Landscape Visual Assessment of Land at Oxford Road by RPS Group

I trust that the attached documents are self-explanatory. However, if you have any queries, please do not hesitate to contact me.

Many thanks,

[REDACTED]

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Our ref: PPS1527

20 Western Avenue
Milton Park
Abingdon
OX14 4SH
T +44 1235 438000

Date: 25th July 2024

Thame Town Council
High Street
Thame
OX9 3DP

Sent via email to: info@thametowncouncil.gov.uk

Thame Neighbourhood Plan (TNP2) 2020-2023. Representations submitted on behalf of CALA Homes Ltd (CALA). Consultation 13th June to 25th July 2024.

RPS Group has been instructed to submit written representations in response to the publication of TNP2, which is a review of the TNP that was 'made' in 2013.

RPS Group has previously submitted representations, on behalf of CALA, in relation to the TNP, as follows:

- Consultation 1 - August 2021
- Consultation 2 – February 2022
- Consultation 3 – August 2023

TNP2 Objectives

CALA is fully supportive of TNP2 and its vision for growth. It is particularly supportive of the TNP2 objectives, which have remained the same as previously proposed and are as follows:

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.

Our ref: PPS1527

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.

Housing Numbers

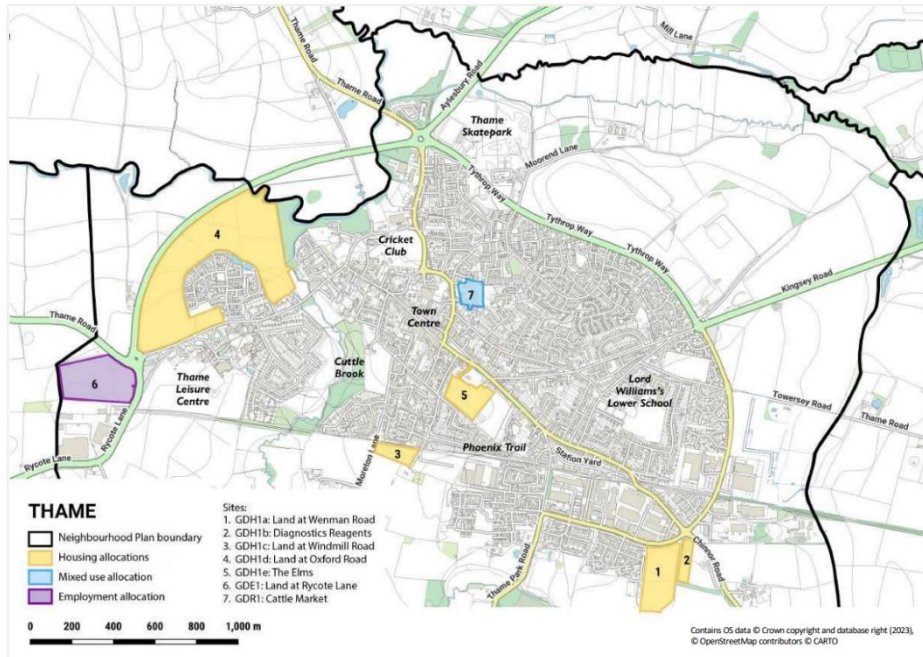
It is noted that the draft TNP2 states in paragraphs 2.4 and 4.7, that it needs to allocate sites for new housing to meet a balance of at least 143 homes in Thame (as at April 2023) as presented by policy H3 in the new joint Local Plan for South Oxfordshire and Vale of White Horse. It should however be emphasised that the number of homes to be allocated is a **minimum** requirement and Neighbourhood Plans can plan for more, particularly if that higher number delivers greater benefits.

The proposed housing balance of at least 143 homes presents a reduction to housing numbers from the previous 2023 consultation of 256 dwellings. Whilst appreciating that the Thame Neighbourhood Plan needs to be consistent and accurately reflect the housing levels in the emerging South Oxfordshire District Council (SODC) local plan review, we believe these figures are inaccurate and they significantly understate the pressing need for new homes within the area. Our formerly submitted representations have taken the consistent position that the proposed housing numbers are too low. As such, we strongly object to the reduction in the quantum of housing delivery from the previous figure of 256 dwellings (April 2022) to the reduced figure of 143 dwellings now proposed.

Thame is a highly sustainable Town with excellent transport links, within close proximity to the City of Oxford and should be a focus for high quality sustainable growth. This position should be reflected within TNP2, and the reduction to housing delivery should be removed. We consider that Thame's capacity for new housing growth should be increased to align with NPPF guidance on the standard method for housing calculations and exceptions, allowing for the continued inclusion of acute levels of unmet housing need present within Oxford City Council and a proactive approach to the delivery of much needed new housing.

Site Allocations

To achieve these housing numbers, TNP2 is proposing to allocate several sites as shown in yellow on the plan below. Whilst we broadly agree with the housing sites identified in TNP2, we consider that Land at Oxford Road (site 4 below) does not best meet the objectives of TNP2. For this reason, we consider that 2 of the draft policies in TNP2 are flawed and unsound, as explained below:



1. Policy GDH1: Housing Allocations

Policy GDH1: Housing development and allocations

1. Land proposed for residential development should in whole, or in part, be contiguous with the existing built-up area of Thame, with a preference for reuse of previously developed land within the built-up area.
2. Proposed sites should not, individually or cumulatively, result in the coalescence of, or unacceptable impact on, the visual separation of (i) Thame and Towersey, or (ii) Thame and Moreton.
3. Sites should be able to connect into the existing network of walking and cycling routes, and either be within walking distance of a bus service or provide scope to route new or extended bus services through the development site.
4. Sites should provide good access to services and facilities, being within walking distance of essential services and amenities, having particular regard to the catchment distances in Table 2. This should be based upon actual journey routes as opposed to application of 'as the crow flies' distances.
5. Vehicular access to the site from the highway must be achievable and acceptable to the Highways Authority.
6. Subject to the scale of proposed development, a Transport Assessment or Transport Statement must be prepared for submission as part of the planning application. This must be based on the '[Decide and Provide](#)' approach adopted by OCC.
7. Where required, applications will be accompanied by a programme of archaeological evaluation to be agreed with Oxfordshire County Council and undertaken in advance of the proposal being determined. Subject to the findings of any evaluation, mitigation measures may be required that preserve features of archaeological interest on site.
8. Sites must be deliverable at the time of submitting a planning application, including the ability to deliver the requirement for any on-site infrastructure triggered by the scale of the proposed development.

Policy GDH1 continued overleaf

9. The following sites are allocated for housing development in the Thame Neighbourhood Area:

<i>TNP2 Policy Reference</i>	<i>Site Name</i>	<i>Development Potential (approx.)</i>
GDH1a	Land south of Wenman Road	60 homes
GDH1b	Diagnostics Reagents	25 homes
GDH1c	Land at Windmill Road	30 homes
GDH1d	Land at Oxford Road of which: North Western parcel Eastern parcel	100 homes of which: 70 homes 30 homes
GDH1e	The Elms	35 dwellings

10. The overall quantum and timing of development of the allocated sites will be subject to the design and masterplanning process for each site, the availability and capacity of infrastructure to support development.

11. Proposals for development of the allocated sites are expected to accord with the principles established in the Thame Masterplanning Report (see Appendix 1).

Policy GDH1 is not considered to be sound, because it proposes to allocate Land at Oxford Road, which does not meet the objectives of TNP2 and fails to include the allocation of my client’s site, which better meets the objectives of TNP2. My client’s site is the following:

Land South of Thame (Site THA9)

It is the view of CALA that some planned growth within the town should be incorporated within the Plan to make efficient use of previously developed sites. However, larger greenfield sites are also needed, to allow for the delivery of a much-needed mix of new homes (in particular affordable homes) alongside additional new infrastructure. This was also the view given in response to a pre-application request for this site in November 2023 stating, ‘Thame is identified in the Local Plan as one of the District’s larger settlements and therefore capable of accommodating new development’. For this reason, CALA advocates the allocation of the land that it is promoting South of Thame.

If allocated, the Land to the South of Thame would deliver a mix of much needed market and affordable housing, in addition to substantial economic, environmental and social benefits. CALA envisages that if allocated, this site would deliver a balanced addition to the town that would be for the benefit of existing and future residents both of the town and surrounding villages, whilst ensuring that TNP2 continues to remain consistent with the Local Plan and national policy, by allocating land for housing within a sustainable edge of settlement location.

CALA has raised concerns within their previous representations to TNP2, in relation to the deliverability and suitability of the other draft allocation sites, and we refer you to our representations of August 2021, February 2022 and August 2023. However, it is the view of CALA that the Land to the South of Thame presents the most sustainable and deliverable option of all the options that have been considered, as the site adjoins the town at its southern edge (located, by foot, 650m away from the centre), therefore within a short walk of

Our ref: PPS1527

many day-to-day services within the town. If allocated, the site would support the aspiration of the TNP2 vision to enhance a “walkable Thame”, which creates and facilitates a healthy and sustainable environment for both existing and future residents.

Land South of Thame will deliver the following package of economic, environmental and social benefits, which directly align with the updated requirements of GDH1:

- A dwelling mix of size and tenure of approximately 225 new homes;
- Limited landscape impacts due to the low-lying nature of the site, allowing the settlement to expand while incorporating a buffer to the adjacent countryside. These factors will maintain the visual and physical separation of Thame and Moreton, an essential requirement as revealed in the pre-application response.
- Connections will be provided to existing walking routes, improving the focus on walking and cycling as means of transport with the Phoenix Trail located immediately north of the site. Further to this, Thame centre and the High Street is located, by foot, 650m from the site, creating a short walk to daily services, including bus stops along the high street.
- The inclusion of the following facilities, delivering on-site infrastructure that is proportionate to the scale of the proposed development and successfully integrating the proposal into the existing area:
 - A 2.1Ha land parcel on which to deliver a new 2 form entry primary school and nursery to service both existing and new residents, although as per the pre-application response confirmation on the need for this is required;
 - 600sqm of incubator serviced offices to support the sustainable growth of small local businesses, similar to the Sanderum Centre in the town centre; and
 - Health facilities provided within a small neighbourhood centre (0.25Ha);
- Unconstrained vehicle access is available through Sycamore Rise to Thame Park Road.
- To create a comprehensive application both a suitable transport assessment/ statement and a programme of archaeological evaluation will be submitted with any subsequent application.
- Gifting of part of the Phoenix Trail to Sustrans, which is part of the National Cycle Way to the north of the site in place of a lease that expires in November 2024;
- 4.4Ha extension to the Cuttlebrook Nature Reserve to the south of the Phoenix Trail; and
- A further 3.5Ha of interconnected open space will be provided.

As referred to above, the site benefits from a suitable unconstrained vehicular access through Sycamore Rise to Thame Park Road, whilst also within a short walk or cycle to the town centre and direct access onto the Phoenix Trail. The location and infrastructure within and closely related to the site could encourage the move away from reliance on the private car to provide a focus on walking and cycling as a safe and active alternative means of transport for new residents with Sustrans National Cycle Way (known as the Phoenix

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Trail or Sustrans Route No. 57) located immediately to the north of the site, where the land is leased (currently until November 2024) to Sustrans by the landowner.

SODC's Landscape Capacity Assessment (LCA) in 2017 concluded that THA9 (i.e. largely the site subject to this representation) should be considered on landscape and visual grounds with part of the wider site allocated for housing and part delivered for landscape enhancements, such as tree planting and green infrastructure. This report concluded a site capacity of 330 units at the time, but this can be varied to meet the needs currently pertaining. The relevant plan from the LCA is included below.

Site: Thame THA9

Site map:

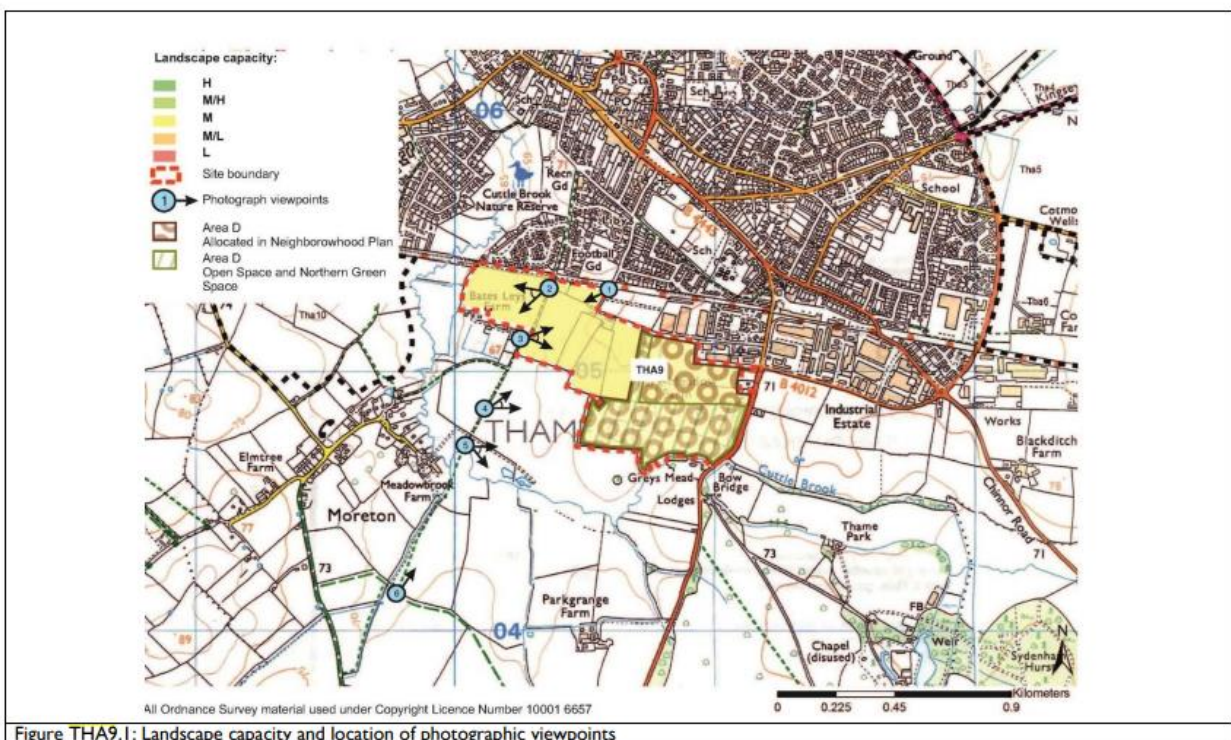


Figure THA9.I: Landscape capacity and location of photographic viewpoints

Land South of Thame is anticipated to deliver around 35% of the land as open space, including both public open space and the Cuttlebrook Nature Reserve extension area, enabling the residential elements to be suitably integrated into the rural fringe of Thame for the enjoyment of existing and future residents of the town.

Thame Park Road, which lies to the east of the site, is an area characterised by a mixture of residential, industrial, recreational and agricultural land uses, and if allocated, this site would make a logical extension to that developed area, with vehicular access provided through the recently completed scheme to the west of Thame Park Road. The access arrangements through to Thame Park Road will require using the street network recently completed at Sycamore Rise for which reserved rights exist. The geometry of the road

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network through Sycamore Rise has been comprehensively assessed against OCC's Street Design Guide 2021 and has been found to have capacity to serve the further development envisaged on land South of Moreton Lane.

Thame residents presently have a positive level of engagement and access to the surrounding countryside due to the existing network of open spaces and routes for sustainable modes of travel including the Sustrans network and Phoenix Trail. This allows residents to benefit from the environmental and social benefits that this network offers. CALA is supportive of the relationship between the town and the surrounding countryside, and to further facilitate this connection, if the land to the South of Thame is allocated it will enhance the setting of the adjacent Phoenix Trail by providing public access to substantial areas of open space along the Cuttlebrook Nature Reserve which would be for the enjoyment and benefit of the wider community by further enhancing the network of open spaces and recreational resources.

If allocated, future residents of the Land South of Thame and existing residents of the town would benefit from pedestrian enhancement and connectivity between the site, the town and the wider countryside through connection to the Phoenix Trail.

Overall, CALA believe that Land South of Thame will better meet the objectives of TNP2 than Land at Oxford Road, for the following reasons:

1. **Compactness and walkability.** Land South of Thame lies within a 10-minute walk / 7 minute cycle of Thame Town Centre. Land at Oxford Road is more remote from the town centre. Land South of Thame better meets the TNP2 objective of keeping the town walkable and compact.
2. **Sensitive environment.** Land at Oxford Road is affected by flood risk, landscape and heritage constraints. It also involves building on land that was previously designated as land 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 new homes and associated community benefits. Land South of Thame has none of these constraints.
3. **Landscape setting.** With the Cuttle Brook Nature Reserve Extension and associated green space, Land South of Thame will integrate easily into the surrounding landscape, bolstered by extensive new landscaping. Land at Oxford Road creates no opportunities to add value to the Cuttle Brook Nature Reserve and the landscape setting of Thame. As shown in the pre-application response, the 2017 landscape capacity assessment found that some development was appropriate, incorporating a low-density approach with significant open space and woodland placed to the south. In addition to this, it was revealed there is a significant opportunity to incorporate landscape planting into the design to deliver an improved treescape and to help integrate the proposed development into the setting.
4. **Integrated communities.** Through high quality footpath and cycleway links, Land South of Thame will be highly sustainable and easily accessible, which will enable it to integrate successfully into Thame, with residents able to make many journeys without the use of the private car. Land at Oxford Road does not benefit from such ease of access to the town centre, and it is a less accessible and sustainable location for development. The proposed community led housing would be considered an

integral part of development and not a separate parcel, and open space can be integrated into the development aligning with the pre-application advice.

5. **Development on Land South of Thame** is in a sustainable location on the edge of Thame, where it is a logical extension to the town with a limited impact on services. This statement is supported by the proposed allocation in policy GDH1 of sustainably located sites to the south of Wenman Road and Windmill Road, which also adjoin the southern edge of the town. Proximity with the existing town will allow design cues to be taken from the wider context and not just adjacent development, as required by the pre-application response. Furthermore, the package of benefits proposed will make a real difference to the economic, environmental and social well-being of the town for many decades to come.

Consequently, CALA considers that policy GDH1 should be amended to include Land South of Thame (THA9), and, for the reasons given below, Land at Oxford Road should be removed.

2. Policy GDH1d: Land at Oxford Road

CALA has previously raised concerns in relation to Land at Oxford Road because it is inconsistent with the Design Brief originally agreed for the existing development, due to a substantial part of it still comprising the northern and eastern parcels forming open space or informal landscape buffering for the adjacent delivery housing allocation of 203 homes, which has now been built out. It is now suggested that Land at Oxford Road will comprise an extension of the Thame Meadows housing scheme, reflecting the scale, character and density of that development area. This change in approach is another clear indication that Land at Oxford Road is not suitable for comprehensive development and will continue to gradually reduce as all constraints are accounted for.

Having reviewed the available evidence base published in relation to Land at Oxford Road, it shows a peripheral and fragmented location from the town, whilst the location would also make a limited contribution to the services and infrastructure offering within Thame. SODC's Landscape capacity assessment (2017) does not consider the site, whilst the same report concludes that the other proposed allocations within this consultation pass the tests at the phase 1 appraisal stage and should be further considered.

With this in mind, CALA is of the view that the housing numbers discussed within this consultation remain wholly inaccurate. The reduction in the delivery of housing numbers from 150 to 100 would still require the majority of the site coming forward for housing, when in fact the evidence published to support the TNP2 process suggest that only the 'Site North West' is available for housing, and this area only has a capacity of circa 78 dwellings. Land known as 'Site East' is not considered to be available or deliverable.

These concerns are reflected in the Thame Neighbourhood Plan Masterplanning Report 2024, which shows an approximate capacity of between 60 to 72 homes for the Site West, and between 26 to 31 homes for the Site East. The desktop assessment of local character, landscape and heritage features, clearly shows that a lower density scheme would be responsive to the built and landscape setting of the area and this is reflective of feedback received from SODC in respect of heritage, landscape and ecology.

Notwithstanding the reduction in housing numbers to the eastern site area, this consultation still does not appear to accurately consider these identified constraints within the housing numbers calculation for this site

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in any detail despite important issues of potential flooding, high ecological value and harmful landscape impact all anticipated to substantially reduce the yield of housing for the site.

In this context, RPS has undertaken a Landscape and Visual Assessment (LVA) of Land at Oxford Road. As with our previous representations, the report is attached, which concludes that development of the Land at Oxford Road site will:

- Impinge upon the small-scale valley of Cuttle Brook;
- Have adverse impacts on the Thame Conservation Area;
- Have impacts on designated landscapes;
- Have adverse impacts on Thame Valley Walk; and
- Cause substantial changes to the amenity of nearby residents.

Unlike Land South of Thame, the site will not:

- Contain development in a low-lying area within a setting of existing Green Infrastructure, which would be retained and enhanced;
- Allow the settlement to expand while incorporating a buffer to the adjacent countryside;
- Create a permeable settlement edge making use of and augmenting existing Green Infrastructure; and
- Offer good connections to Thame town centre and the surrounding countryside for cyclists and pedestrians.

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Accordingly, CALA remains concerned that if the Land at Oxford Road site is allocated, there is a substantial likelihood that this site would not have the capacity, or the evidence base, to deliver all of the 100 homes proposed for the site as part of this allocation. The reduction from 150 to 100 since the previous consultation shows that CALA was right in its previous assessment of the potential of the site and it is very clear that the site has substantial constraints, which have failed to be properly studied. It is our view this situation continues to be the case, which could result in unplanned windfall applications being required in the near future, to make up the resultant shortfall in housing numbers.

TNP2: Submission Version
2020-2041



Figure 15: Concept masterplan for land at Oxford Road based upon design principles for the site. Further detail is set out in the Thame Masterplanning Report.

The following planning applications are relevant to this site:

1. **P22/S2418/FUL** – Full planning application for 77 homes, with associated open space, a surface water attenuation basin, associated landscaping and supporting infrastructure.

This planning application was submitted in August 2022. Almost two years have passed and this planning application has still not been determined. Numerous objections to the application have been submitted, including:

- South and Vale Countryside Officer – Holding objection – the application site was previously identified as land to be made more publicly accessible, through the provision of a permissive route, under P14/S3841/FUL (203 dwellings). This was secured through a legal agreement. This permissive path passes directly through the site and links to the Cuttle Brook Local Nature Reserve. Ecological evidence submitted with the application is considered to be sub-standard.

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- Air quality – in the absence of an Air Quality Assessment, the EHO has no option but to recommend refusal of the application.
- Conservation and Design – the officer states that the site is allocated as natural green space to extend the Cuttle Brook Nature Reserve in the TNP. The proposal will have an adverse and harmful impact on a number of listed buildings and the rural setting of the designated Thame Conservation Area. The proposals would result in harm to the significance of heritage assets. It needs to be outweighed by public benefits.
- Environment Agency – not satisfied with the flood risk modelling undertaken by the applicant.
- Forestry Officer – proposed tree planting is not compliant with policy.
- Landscape Officer – whilst some development within the site may be acceptable, the level of development proposed does not allow adequate space for landscape mitigation, either on the site boundaries or within the site, and extends significantly into the Cuttle Brook corridor, narrowing it to a pinch point. There is a lack of tree planting, open space, play provision and a positive SUDS feature contrary to policy.
- Newt Officer – Nature Space – is not satisfied that the applicant has adequately demonstrated that there will be no impact to Great Crested Newts or their habitat.

Whilst Thame Town Council may be proposing this site as part of the allocation in TNP2, it is noticeable that after two years, the Town Council has still not yet commented on this planning application. Whilst all the matters of detail, such as heritage harm, air quality, tree planting and ecology impacts, may be capable of being resolved, it is clear that the principle of development on the site is in doubt, because of the sites designation as being more publicly accessible in the previous planning application. As recently as 2014, the site was identified as land to be made more publicly accessible in a section 106 agreement. In this context, planning permission should not be granted, unless replacement open and publicly accessible land is found elsewhere in the local area.

2. **P14/S3841/FUL** for 203 dwellinghouses (Site F), which has since been built by Bloor Homes, came with the following package of community benefits:
 - 17 hectares of landscaped publicly accessible open space
 - 1.4 hectares of land as potential expansion land for the planned consolidation of Lord William's School.
 - 2 hectares of land as a potential future primary school.

When assessing the planning balance of the application, in his delegated report, the planning officer stated that:

The proposed layout in particular delivers a network of green links, pedestrian and cycle routes that will ensure good sustainable connectivity for this site, which does lie on the outskirts of Thame.

Clearly, the extant application, if approved in its current form, will put at risk some of the significant benefits that were created by the previous planning application and development. The current application includes

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negligible amounts of public open space, and no land is being offered for school expansion or other community uses. The net effect of the current application is the diminution of publicly accessible and amenity land, as well as zero improvements to local community facilities.

Conclusions

In this context, CALA maintains that Land at Oxford Road is not suitable for housing allocation in TNP2, and it should be removed from policy GDH1. Instead, Land South of Thame should be allocated for around 225 dwellings under policy GDH1d, which will bring forward a comprehensive and valuable package of economic, environmental and social benefits, in addition to much needed new homes, including affordable homes, which will considerably enhance the setting of the town of Thame and make it an even more desirable place to live, both for future and current residents.

We hope that these representations are clear and helpful. Please let me know if you have any queries.

Yours sincerely,

for R P S Group Limited



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LAND AT THAME

Landscape and Visual Appraisal



JSL4910
Land at Thame
VF
7 August 2023

REPORT

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
1	Draft	RA	CD		01/08/23
2	Draft	RA	JB		2/08/23
3	Draft	RA	JB		04/08/23
4	Final	CD	JB		07/08/23

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Prepared for:

CALA Homes Limited

EXECUTIVE SUMMARY

RPS has been appointed by CALA Homes to prepare a Landscape and Visual Appraisal (LVA) of land at a proposed housing allocation site at Oxford Road as set out in the Thame Neighbourhood Plan 2020-2035 Consultation Draft (TNP2). The LVA has examined the potential landscape and visual impacts of a Concept Masterplan shown in TNP2 and in Thame Neighbourhood Masterplanning Report prepared by AECOM in March 2023 for Thame Town Council. The LVA is informed by the methodology shown in Appendix A and is intended to provide an assessment of the nature of impacts and whether these are adverse rather than significant or not significant.

The assessment identified adverse effects on the following landscape receptors:

- Landscape fabric in the eastern development area
- Undulating Open Vale Landscape Type (LT)
- Flat Floodplain Pasture LT
- Landscape Character Area (LCA) 5.11 Thame Valley
- LCA 8.11 Peppershill Arable
- LCA 9.8 Chilton Ridge
- Vale of Aylesbury Area of Attractive Landscape to the north of the proposed development
- Thame Conservation Area

The adverse impacts on landscape result from the relatively prominent location of the western development area and its proximity to areas of recognised scenic quality. The proposed development would create a ribbon of development extending into open countryside and would be uncharacteristic of the pattern of development at the edge of Thame resulting in adverse impacts on landscape character. The eastern part of the proposed development would occupy an area of small-scale landscape with small fields, meadows and a river valley character associated with Cuttle Brook. Development would adversely change the character of this area and result in the loss of part of a small-scale valley landscape.

The assessment identified adverse effects on the following visual receptors:

- Residents of Offa Place, Causeway Close, Henge Court and Roman Way
- Residents of Weavers Branch and Drovers Crescent
- Residents of Town Farm Close, Town Farm Lane and Cuttle Brook Gardens
- Users of the A418
- Users of Oxford Road at Cuttle Brook
- Users of Thame Valley Walk

The adverse impact on visual receptors would result from the loss of open views from existing residential areas at Thame Meadows and in particular in the eastern part of the development where the small-scale composition of views is sensitive to the scale of change proposed. Residents to the south of the eastern development area would experience a loss of open views to the north resulting in a considerable change to visual amenity as this is the only open outlook from the majority of the properties at Town Farm Lane and Cuttle Brook Gardens.

The character of the A418 would change adversely from a largely rural outlook to an urban edge character along part of the route. At Oxford Road the composition of views north from the section at Cuttle Brook would change adversely from views of a small-scale field pattern and wooded valley character to housing and formal planting and open space giving an abrupt transition to the wooded Cuttle Brook corridor. Users of Thame Valley walk would experience adverse effects resulting from views of the proposed development which would appear to impinge upon the valley and be uncharacteristic of views to the south and southeast.

Overall, the impacts of development at Oxford Road would result in permanent adverse change to an area of transitional landscape character between undulating farmland and small-scale valley landscapes.

The CALA site to the south of Thame is identified in South Oxfordshire Council's (2017) Landscape Capacity Study as potentially being able to accommodate up to 330 dwellings on land to the west of the existing Persimmon Homes development which was completed in 2021. While there would be limited localised impacts on landscape character and visual amenity it is considered that, if developed in accordance with the illustrative masterplan shown on Figure 1.3, the CALA site would:

- Avoid impinging upon the small-scale valley of Cuttle Brook
- Avoid adverse impacts on Thame Conservation Area
- Avoid adverse impacts on Moreton Conservation Area
- Avoid impacts on any designated landscapes
- Avoid adverse impacts on Thame Valley Walk
- Avoid substantial changes to the amenity of nearby residents
- Minimise impacts on NCN route 57
- Contain development in a low-lying area in a setting of existing Green Infrastructure which would be retained and enhanced
- Allow the settlement of Thame to expand while incorporating a buffer to the adjacent countryside
- Create a permeable settlement edge making use of and augmenting existing Green Infrastructure
- Offer good connections to Thame town centre and the surrounding countryside for cyclists and pedestrians.

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Appendices

Appendix A LVIA Methodology

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1 INTRODUCTION

1.1 RPS has been appointed by CALA Homes to prepare a Landscape and Visual Appraisal (LVA) of land at Oxford Road (hereafter ‘the Site’) which is shown on **Figure 1**. The LVA is based on development in the west and east of the Site as shown on **Figure 1**. The Site is identified in the Thame Neighbourhood Plan 2 2020-2035 Draft Version for Consultation as site 4 *GDH1d: Land at Oxford Road* as shown on **Figure 1.1** below.

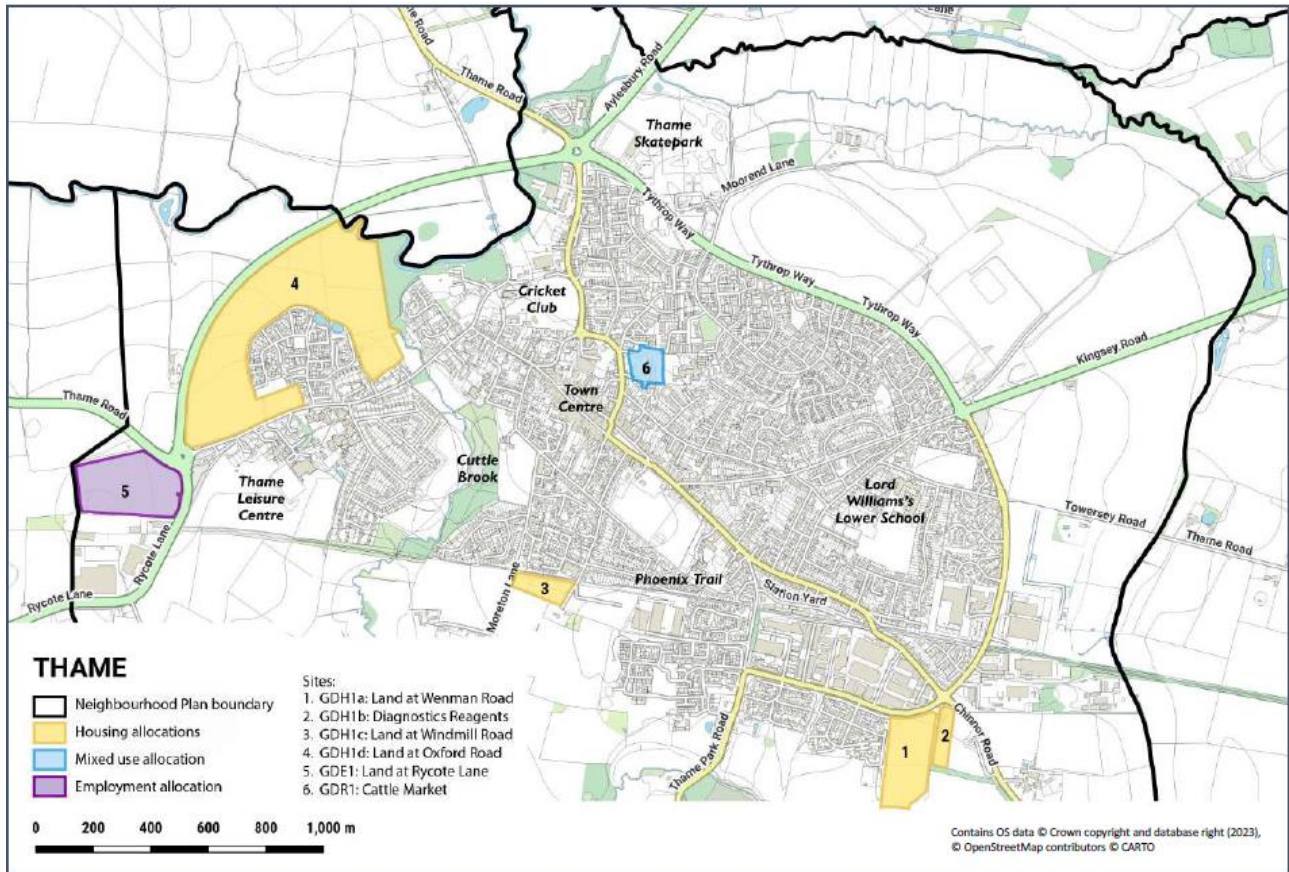


Figure 1.1: Map extract - Site Allocations from Thame Neighbourhood Plan 2¹

1.2 Thame Town Council commissioned AECOM to prepare “...a vision for how the sites in the Neighbourhood Area should come forward.” The resulting document, *Thame Neighbourhood Plan Masterplanning Report* March 2023, sets out high level design concepts that illustrate design principles that Thame Neighbourhood Forum wishes to promote and apply at the sites identified. The AECOM report identifies two housing sites at Oxford Road in the west and east. These are shown on **Figure 1.2** below, which is an extract from the AECOM report showing the “Design Concept”.

1.3 This LVA is based on the “development area” as shown in the key on the map extract and on the west and east site plans. The LVA uses a Zone of Theoretical Visibility (ZTV) map (**Figure 2** appended to this report) based on buildings up to 9m in height in the “development areas” at the west and east sites at Oxford Road. The ZTV provides an indication of theoretical visibility including screening by buildings and blocks of woodland. It does not take into account screening

¹ Thame Town Council, (2023). Thame Neighbourhood Plan (TNP2) 2020-2035 Regulation 14 Consultation Version May 2023.

that may be provided by individual trees, hedges and other smaller areas of existing and proposed planting.

- 1.4 The LVA is informed by RPS Landscape and Visual Impact Assessment (LVIA) Methodology which is described in **Appendix A** and Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA2)². The LVA is proportionate to the scale of the proposed development being assessed (i.e. the Design Concept shown in **Figure 1.2**); the sensitivity of the receiving landscape and visual baseline; and the information available about the proposed development. Assessment judgements are based on the information about the proposed development included in *Thame Neighbourhood Plan Masterplanning Report* March 2023. The LVA is intended to provide an assessment of the nature of impacts and whether these are adverse rather than significant or not significant.



Figure 1.2: Map Extract - Oxford Road Design Concept from Thame Neighbourhood Plan Masterplanning Report March 2023³

- 1.5 The LVA has been undertaken by Ross Allan CMLI and Corinna Demmar CMLI and is based on field survey work on Friday 21st July 2023. Both Ross and Corinna have considerable experience of undertaking LVIA and LVA of residential developments and experience of preparing landscape feasibility studies, sensitivity and capacity studies and evidence base documents inputting into site promotion documents.

² Landscape Institute and Institute of Environmental Management and Assessment, (2013). Guidelines for Landscape and Visual Impact Assessment. Third Edition.

³ AECOM, (2023). Thame Neighbourhood Plan Masterplanning Report. Final Report March 2023.

1.6 Cala Homes is promoting a site to the South of Moreton Lane which is shown on **Figure 1.3** and on **Figures 1-3**. The Cala site is not assessed as part of this LVA as it has already been considered by South Oxfordshire District Council (SODC) in a Landscape Capacity Assessment in 2017⁴. The findings of that capacity study are described in **Section 2.6** of this LVA.



Figure 1.3: Map Extract – Cala Homes Limited Land South of Thame Illustrative Masterplan

⁴ South Oxfordshire Council, (2017) Landscape Capacity Assessment for Sites on the edge of Didcot, Henley, Thame and Wallingford in South Oxfordshire.

2 LANDSCAPE RELATED DESIGNATIONS AND POLICY

2.1 This section identifies any landscape planning designations relevant to the Oxford Road site and outlines relevant district and local planning policy.

South Oxfordshire District Council

South Oxfordshire Local Plan 2011-2035

Policy STRAT5: Residential Densities

2.2 Policy STRAT5 states that:

“1. Planning permission will only be granted where it can be demonstrated that the proposal optimises the use of land and potential of the site. Developments should accommodate and sustain an appropriate amount and mix of uses (including green space and other public space) and support local facilities and transport networks.”

“2. The density of a development should be informed by:

i) the capacity of the site and the need to use land efficiently in accordance with Policy DES7: Efficient use of resources;

ii) the need to achieve high quality design that respects local character;

iii) local circumstances and site constraints, including the required housing mix, and the need to protect or enhance the local environment, Areas of Outstanding Natural Beauty, heritage assets, and important landscape, habitats and townscape;

iv) the site’s (or, on strategic allocations, the relevant part of the site’s) current and future level of accessibility to local services and facilities by walking, cycling and public transport; and

v) the need to minimise detrimental impacts on the amenity of future and/or adjoining occupiers.”

“3. Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities.”

Policy TH1: The Strategy for Thame

2.3 This strategic policy states the requirements of Neighbourhood Development Plans:

“Neighbourhood Development Plans are expected to, and the Council will support development proposals that:

i) deliver homes in accordance with Policy H3;

ii) strengthen the retail offer within Thame Town Centre;

iii) improve the attraction of Thame for visitors and businesses;

iv) improve accessibility, car and cycle parking, pedestrian and cycle links;

v) support schemes that enhance the quality of the town’s environment and conserve and enhance the town’s heritage assets;

vi) provide new employment opportunities and improve the stock of existing employment areas; and

vii) provide new, or enhanced community facilities that meet an identified need.”

Policy H3: Housing in the Towns of Henley-on-Thames, Thame and Wallingford

- 2.4 Policy H3 requires Thame to deliver at least 1,518 homes and states that Neighbourhood Development Plans “...should seek to meet demonstrable local needs...even if this were to result in housing provision in excess of the outstanding requirement...”

Policy ENV1: Landscape and Countryside

- 2.5 Policy ENV1 states that:

“2. South Oxfordshire’s landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of South Oxfordshire’s landscapes, in particular:

- i) trees (including individual trees, groups of trees and woodlands), hedgerows and field boundaries;*
- ii) irreplaceable habitats such as ancient woodland and aged or veteran trees found outside ancient woodland;*
- iii) the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains;*
- iv) other watercourse and water bodies;*
- v) the landscape setting of settlements or the special character and landscape setting of Oxford;*
- vi) topographical features;*
- vii) areas or features of cultural and historic value;*
- viii) important views and visually sensitive skylines; and*
- ix) aesthetic and perceptual factors such as tranquillity, wildness, intactness, rarity and enclosure.”*

Policy ENV1 also advises that “Significant weight is also given to protecting non-designated landscapes, the countryside and Green Infrastructure assets from harm.”

Policy ENV5 Green Infrastructure in New Developments

- 2.6 Policy ENV5 requires new development “...to contribute towards the provision of additional Green Infrastructure and protect or enhance existing Green Infrastructure.”

“2. Proposals should:

- i) protect, conserve or enhance the district’s Green Infrastructure;*
- ii) provide an appropriate level of Green Infrastructure with regard to requirements set out in the Green Infrastructure Strategy, AONB Management Plan or the Habitats Regulations Assessment;*
- iii) avoid the loss, fragmentation, severance or other negative impact on the function of Green Infrastructure;*
- iv) provide appropriate mitigation where there would be an adverse impact on Green Infrastructure; and*
- v) provide an appropriate replacement where it is necessary for development to take place on areas of Green Infrastructure.”*

“3. All Green Infrastructure provision should be designed with regard to the quality standards set out within the Green Infrastructure Strategy... Consideration should also be given to inclusive access and contributing to gains in biodiversity, particularly through the use of appropriate planting which takes account of changing weather patterns...”

Policy DES1 Delivering High Quality Development

2.7 Policy DES1 requires all new development to be of high quality design and includes 19 criteria to be addressed. In the context of this LVA the most relevant criteria are:

- “i) uses land efficiently while respecting the existing landscape character;*
- ii) enhances biodiversity and, as a minimum, leads to no net loss of habitat;*
- iii) incorporates and/or links to a well-defined network of Green and Blue Infrastructure;*
- vii) takes into account landform, layout, building orientation, massing and landscaping; and*
- xiii) respects the local context working with and complementing the scale, height, density, grain, massing, type, and details of the surrounding area.”*

The background to Policy DES1 states that *“Past developments in the district have not always taken account of future development coming forward on adjacent sites, this has undermined the integration of new development with existing communities.”*

Policy DES2 Enhancing Local Character

2.8 The background to Policy DES2 advises that:

“All proposals should take account of the local context, including the local character and existing features. Important local features, both within the landscape and built environment, in particular should be retained as part of the proposal.”

“In some cases developers have been selective in the features that they have identified as forming part of the local character and have not always considered whether the features form a positive part of the local character.”

The policy states that:

“1. All new development must be designed to reflect the positive features that make up the character of the local area and should both physically and visually enhance and complement the surroundings.

2. All proposals for new development should be informed by a contextual analysis that demonstrates how the design:

- i) has been informed by and responds positively to the site and its surroundings; and*
- ii) reinforces place-identity by enhancing local character.*

3. Where a Character Assessment has been prepared as part of a made Neighbourhood Development Plan, a proposal must demonstrate that the positive features identified in the Assessment have been incorporated into the design of the development.

4. Where there is no local Character Assessment a comprehensive contextual analysis of the local character should be prepared as part of an application. This should identify the positive features that make up the character of the area. The proposal must demonstrate that these positive features have been incorporated into the design of the development.

5. Proposals that have the potential to impact upon a Conservation Area or the setting of a Conservation Area should also take account of the relevant Conservation Character Appraisal.”

Thame Neighbourhood Plan 2013

- 2.9 Thame Neighbourhood Plan 2013 identifies Potential Development Areas on Figure 3.1 of the Plan. Oxford Road site is identified as ‘Site F’, with the CALA Site identified as ‘Site D’. The Plan states that “...the majority of new homes are allocated between three sites: C, D and F.” One of the aims of allocating across three sites is stated as ensuring “...that development on Site F is at a level that can respond sensitively to views to the site.”
- 2.10 Figure 5.1 of the Plan shows the allocated area at Oxford Road in purple with an allocation of 203 dwellings with publicly accessible open space wrapping around the northern and eastern parts of the site and further land reserved for housing to the west and a school site reserved on the southern side. This is shown in the map extract **Figure 2.1** below.

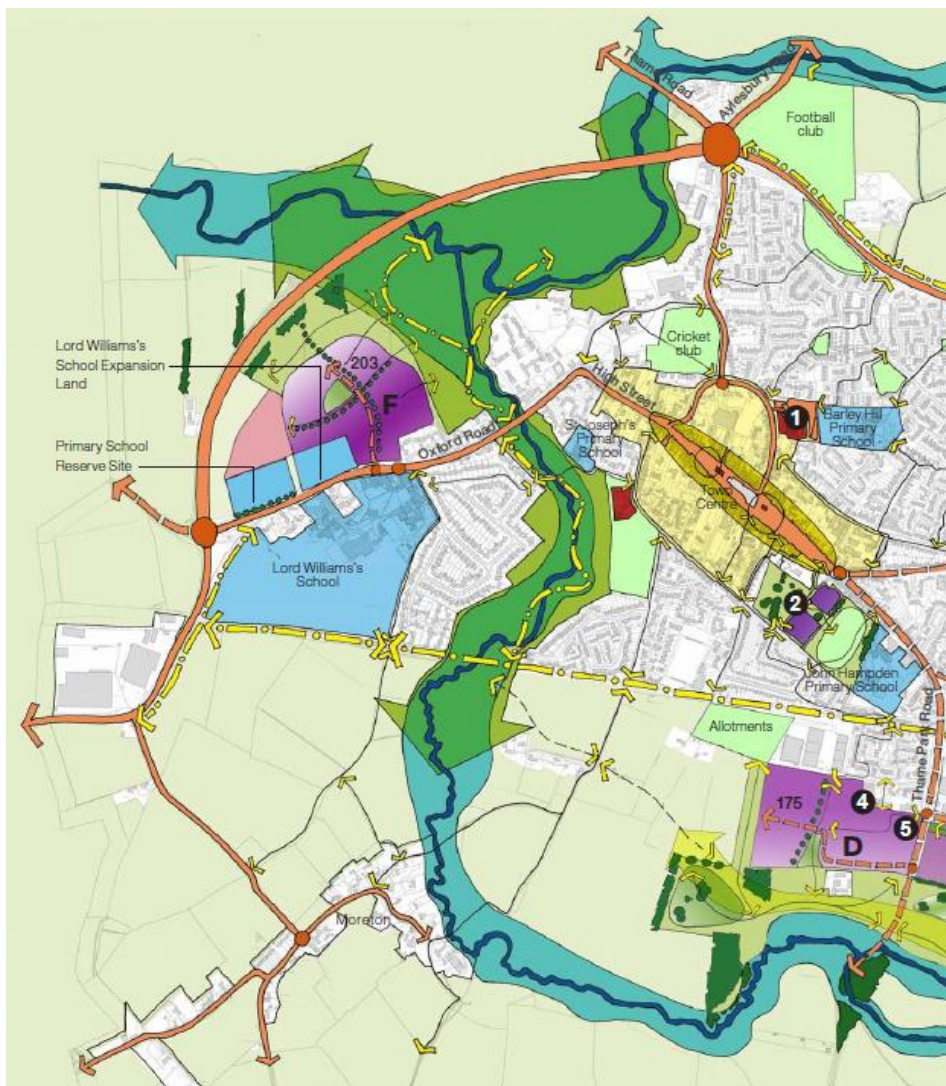


Figure 2.1: Map Extract – The Future Vision for Thame from Thame Neighbourhood Plan 2013⁵

- 2.11 Policy H4: Integrate Allocated Sites has the objective of integrating new housing into Thame and states:

“The vision for Thame is to ensure that the town continues to feel ‘compact’. This means that new housing should be well integrated into the town, avoiding a single large development that is

⁵ Thame Town Council, (2013). Thame Neighbourhood Plan

perceived as a separate place. This will ensure that residents in the new homes feel integrated with the existing community. Dispersing new housing development across a range of sites will help ensure that these sites are of a size that avoids dominating the local area.”

2.12 Policy H6: Design New Development to be of High Quality is about ensuring that new housing on allocated sites is “...of high quality and designed to reflect Thame’s character...” which is discussed in more detail in Section 11 of the Plan under the objective of: “Development should reinforce the character and quality of Thame” which is supported by a number of policies including:

- *“Policy ESDQ16: Development must relate well to its site and its surroundings. Development proposals must respond to the specific character of the site and its local surroundings, maintaining or enhancing its strengths and seeking to address its weaknesses.*
- *ESDQ17: Development must make a positive contribution towards the distinctive character of the town as a whole. Development must contribute to the character of Thame as a whole, incorporating design principles that reflect the most successful parts of town.*
- *ESDQ18: New development must contribute to local character by creating a sense of place appropriate to its location. New development will be expected to support the town centre as the main focus of activity and not to create alternative centres. It is important that the new residential areas are designed to create a sense of place by ensuring that the character varies within the development.*
- *ESDQ21: Development proposals, particularly where sited on the edge of Thame or adjoining Cuttle Brook, must maintain visual connections with the countryside. Where possible, open views towards the countryside, or across open spaces, must be maintained from key existing routes within the town. Views along streets and/or open spaces to the surrounding countryside must be created within new developments where there are opportunities to do so.*
- *ESDQ22: The visual impact of new development on views from the countryside must be minimised. An assessment of views to and from the proposed development must be included in the Design and Access Statement. Visual impact should be minimised through the design of the site layout, buildings and landscape. The approach to minimising visual impact must be fully explained in the Design and Access Statement.”*

2.13 Policy HA1 sets out the policy requirements for developing Site F Oxford Road and these are shown on **Figure 2.2** below. A key design driver described in Policy HA1 is the potential visual impact of development on the surrounding area and the requirement to set back from the A418.

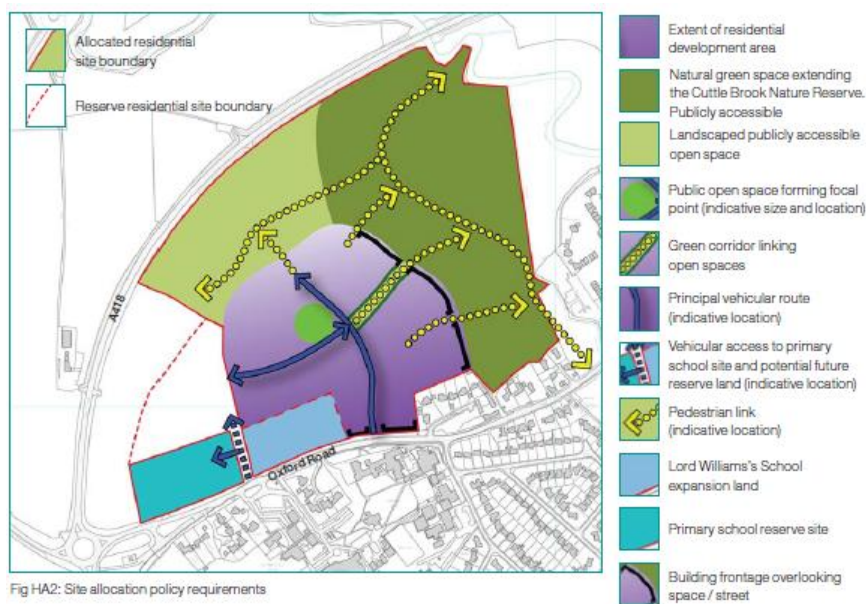


Figure 2.2: Map Extract – Site allocation policy requirements for Oxford Road⁶

Thame Neighbourhood Plan 2020-2035 Consultation Draft

2.14 As mentioned in the introduction to this LVA the Oxford Road site is identified in Policy GDH1d as a Housing Allocation site. **Figure 1.2** shows the Design Concept and indicates that land identified as “Natural Greenspace” and “Landscaped Publicly Accessible Open Space” in the 2013 Plan is proposed as new housing development and “Accessible Parkland with Wetland Habitat” in TNP2. There are no new permissive paths identified in the concept masterplan shown in the 2023 Plan (see **Figure 2.3** below).



Figure 2.3: Map Extract – Concept Masterplan from TNP2⁷

2.15 Policy CPQ1: Design in Response to Local Character states that: *“Proposals for new development in the Neighbourhood Plan area which satisfy wider policies in the Development Plan and which respond positively to the setting and character of the area within which it is located, will be supported.”*

2.16 Policy NEC1: The Cuttle Brook Corridor states that:

“1. Any development proposals alongside the Cuttle Brook corridor, including the Nature Reserve (as defined on Figure 20), must ensure that the north-south green corridor through Thame is maintained.”

⁶ Thame Neighbourhood Plan, (2013). Thame Town Council

⁷ Thame Town Council, (2023). Thame Neighbourhood Plan (TNP2) 2020-2035 Regulation 14 Consultation Version May 2023.

2. *Development should:*

a) *Maintain and enhance the environment and landscape character of the corridor, including water bodies and water quality.*

b) *Conserve and enhance biodiversity, including potential for connecting habitats.*

c) *Contribute towards biodiversity net gain.*

d) *Support appropriate access for leisure and recreation that promotes movement by foot or bicycle, subject to mitigating impacts on the Nature Reserve caused by increased recreational use.*

3. *Extensions to the Cuttle Brook Nature Reserve should be incorporated into the master planning principles of any development adjacent to the corridor.”*

Cuttle Brook is integral to the objectives of the Thames Green Living Plan the principles of which are supported by TNP2. Thames Green Living Plan incorporates Green and Blue Infrastructure objectives and aims to improve the quality of life locally.

Oxfordshire Wildlife and Landscape Study

2.17 The Oxfordshire Wildlife and Landscape Study (OWLS) is a County wide study completed in 2003. It identifies nine Regional Character Areas (RCA) and 24 Landscape Character Types (LCT) in Oxfordshire. RCA are large areas of distinctive regional character while the smaller LCT show recognisable characteristics that occur in more than one geographical area.

2.18 The Oxford Road site is in the Vale of Aylesbury RCA and in a unit of Rolling Clayland LCT. OWLS does not describe RCA in detail and provides the following description of the key characteristics of Rolling Clayland LCT:

- *“Rolling landform, strongly undulating in places.*
- *Dense corridors of willows bordering many small streams and ditches.*
- *Small to medium-sized mixed plantations.*
- *Small to medium-sized grass fields and some arable cropping.*
- *Moderately sized settlements and dispersed farmsteads.”*

SODC Landscape Character Assessment for the Local Plan 2033

2.19 South Oxfordshire District Council (SODC) prepared a landscape character assessment in 2003 and adopted it as district wide Supplementary Planning Guidance (SPG) to the Local Development Plan. The landscape character assessment described in the 2003 SPG provides the basis for the more detailed descriptions of landscape character in the Landscape Character Assessment for the Local Plan 2033 prepared in 2017.

2.20 The 2017 study augments the description of the 11 larger landscape character areas (LCA) identified in the 2003 study and breaks the character areas down into smaller Landscape Types (LT). **Figure 2.4** shows the approximate location of the Oxford Road site in relation to the Clay Vale and relevant LT. The Oxford Road site is located in The Clay Vale, the key characteristics of which are described in the 2017 study as:

- *“The landscape ranges between c. 50m AOD and c. 110m AOD.*
- *The River Thames is located adjacent to the northern and western character area boundary.*
- *The area is crossed by a network of small watercourses.*
- *Ancient woodland exists in small areas.*

- The land use is predominantly agricultural, comprising mostly of arable land.
- Arable field margins are widespread in the area.
- The Clay Vale contains *Spartum Fen* SSSI designated for its calcareous fen and carr vegetation, open water habitats and damp, oak woodland.
- Busy transport corridors cross through this area including the M40 motorway, the A40, A329 and A418 roads.
- Long distance views to the Chilterns AONB in the east.
- Villages in the area are typically nucleated.”

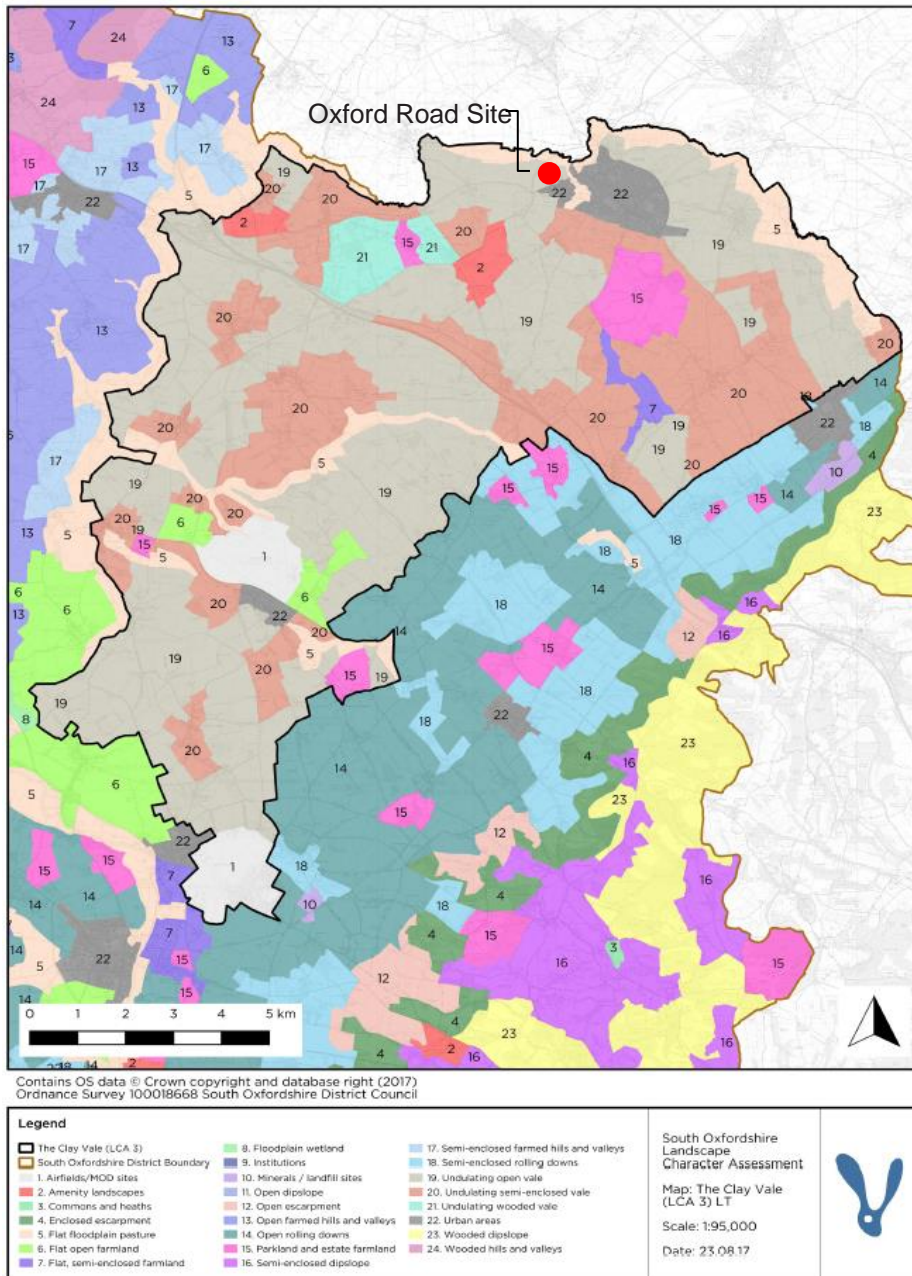


Figure 2.4: Map Extract – Landscape Types in The Clay Vale LCA⁸

⁸ Adapted from South Oxfordshire Landscape Character Assessment 2017

- 2.21 The 2017 study identifies nine LT in The Clay Vale LCA. Most of the Oxford Road site coincides with Undulating Open Vale LT the key characteristics of which are described as:
- *“Low-lying, undulating or gently rolling landform.*
 - *Large-scale farmland, mostly under intensive arable cultivation.*
 - *Typically large fields, with rectilinear pattern of field boundaries.*
 - *Weak structure of tightly clipped or gappy hedgerows, with few hedgerow trees.*
 - *Open, denuded and exposed character, with high intervisibility.*
 - *Distinctive elevated and expansive character on higher ground, with dominant sky and long views.*
 - *Predominantly rural character but some localised intrusion of main roads (including M40/A40), overhead power lines and built development.”*
- 2.22 A small proportion of the Oxford Road site coincides with Flat Floodplain Pasture LT the key characteristics of which are described as:
- *“Flat, low-lying farmland, typically dominated by permanent pasture with a distinctively ‘wet’, riparian character.*
 - *Prone to flooding with distinctive network of drainage ditches.*
 - *Comparatively strong landscape structure with willows conspicuous along the riverside.*
 - *Small-scale landscapes with intimate, pastoral and tranquil character.*
 - *Generally low intervisibility, although views along the river corridor may be possible in some more sparsely vegetated areas.”*
- 2.23 Undulating Open Vale LT occurs widely throughout The Clay Vale LCA in large tracts with Flat Floodplain Pasture LT restricted to smaller river valley floors and occurring less frequently.
- 2.24 The CALA site coincides with Undulating Semi-enclosed Vale LT:
- *“Similar to undulating open vale landscape type but with a stronger structure of hedgerows and trees which provide clearer definition of field pattern.*
 - *Predominantly intensive arable land use but some pockets of permanent pasture occur, particularly around settlements and in the more strongly undulating areas.*
 - *Predominantly rural character but some localised intrusion of main roads (including M40/A40), overhead power lines and built development.*
 - *Moderate intervisibility.”*
- 2.25 The 2017 study includes the following general development guidance/mitigation associated with the expansion and infilling of settlements:
- *“Minimise the visual impact of intrusive land uses at the fringes of towns, villages and farms with the judicious planting of tree and shrub species characteristic of the area. This will help to screen the development and integrate it more successfully with its surrounding countryside.*
 - *Maintain the nucleated pattern of settlements, and promote the use of building materials to maintain vernacular style and a scale of development and that are appropriate to the Clay Vale (see also the South Oxfordshire Design Guide, November 2016).*
 - *Maintain local distinctiveness by controlling the quality of built development taking into account its scale, setting and use of local building materials.*

- *Protect the sparsely settled character of the landscape and the integrity and vernacular character of the estate villages.”*

SODC Landscape Capacity Assessment

2.26 The SODC Landscape Capacity Assessment for Sites on the edge of Didcot, Henley, Thame and Wallingford in South Oxfordshire was prepared in 2017 with the purpose of identifying the capacity of potential additional housing sites around the four towns in South Oxfordshire. It was based on the South Oxfordshire Landscape Character Assessment 2017.

2.27 The Site at Oxford Road is not considered in that assessment although as mentioned in Section 1 the CALA Homes site at Moreton Lane (THA9.2) was considered and deemed to have capacity for up to 330 dwellings (see **Figure 2.5** below). It was acknowledged in the capacity study that the area in the east of THA9.2 was allocated for housing in the 2013 Thame Neighbourhood Plan and this was a consideration in the capacity guidance provided in the study. The study advised that development at THA9.2:

- *“[Has] potential to ameliorate fragmented southern edge to the town*
- *[Has] potential to create substantial landscape buffer to screen existing as well as proposed development*
- *Relates well to allocation of Area D in the Neighbourhood Plan.”*

2.28 It recommended that development should:

- *“Contain housing within ‘reduced area’ as shown in Figure THA9.2 [see below]*
- *Provide major green infrastructure as shown in Figure THA9.2 [see below]*
- *Access off allocated site D.”*

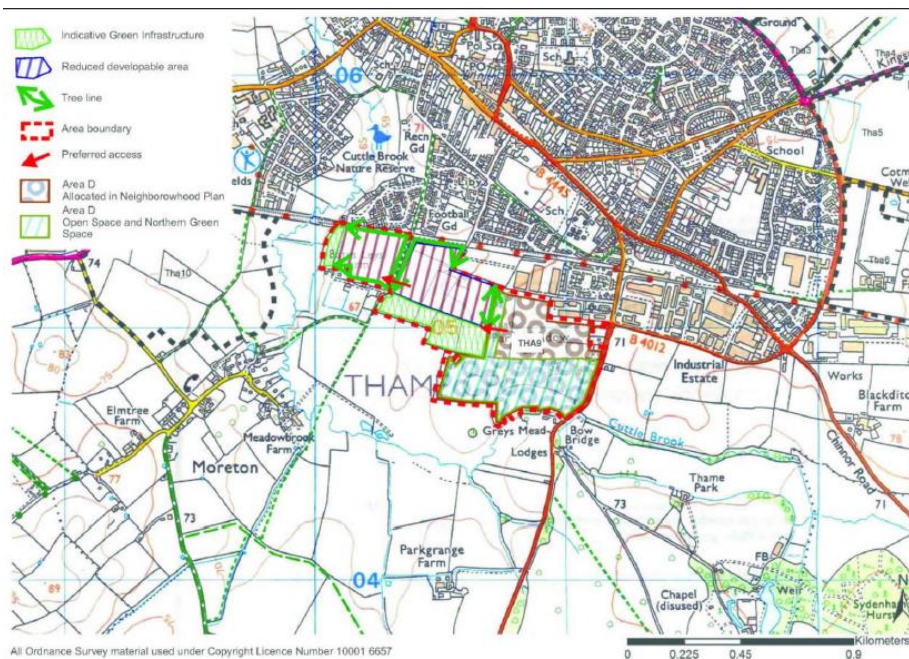


Figure 2.5: Map Extract THA9.2 Potential reduced developable area and Green Infrastructure⁹

⁹ South Oxfordshire Council, (2017) Landscape Capacity Assessment for Sites on the edge of Didcot, Henley, Thame and Wallingford in South Oxfordshire.

Vale of Aylesbury Local Plan 2013-2033

2.29 The northern part of the Site is adjacent to the administrative boundary of Vale of Aylesbury District Council adopted in 2021. Policy NE4 Landscape character and locally important landscape is pertinent to this LVA as there is a locally designated landscape adjacent to the Site as shown on Figure 1.

2.30 Policy NE4 advises that:

“Development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment (LCA), their sensitivity to change and contribution to a sense of place. Development should consider the characteristics of the landscape character area by meeting all of the following criteria:

- *Minimise impact on visual amenity*
- *Be located to avoid the loss of important on-site views and off-site views towards important landscape features*
- *Respect local character and distinctiveness in terms of settlement form and field pattern, topography and ecological value*
- *Carefully consider spacing, height, scale, plot shape and size, elevations, roofline and pitch, overall colour palette, texture and boundary treatment (walls, hedges, fences and gates)*
- *Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas, and in areas which are intrinsically dark and to avoid light pollution to the night sky*
- *Ensure that the development is not visually prominent in the landscape; and*
- *Not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value.*

The first stage in mitigating impact is to avoid any identified significant adverse impact. Where it is accepted there will be harm to the landscape character, specific on-site mitigation will be required to minimise that harm and, as a last resort, compensation may be required as part of a planning application. This reflects the mitigation hierarchy set out in paragraph 152 of the NPPF (2012). Applicants must consider the enhancement opportunities identified in the LCA and how they apply to a specific site.

The Policies Map defines areas of attractive landscape (AALs) and local landscape areas (LLAs) which have particular landscape features and qualities considered appropriate for particular conservation and enhancement opportunities. Of the two categories, the AALs have the greater significance. Development in AALs and LLAs should have particular regard to the character identified in the report ‘Defining the special qualities of local landscape designations in Aylesbury Vale District’ (Final Report, 2016) and the LCA (2008).”

2.31 The Area of Attractive Landscape (AAL) adjacent to the Site comprises of a number of landscape character areas (LCA) which are described separately in the Aylesbury Vale Landscape Character Assessment (AVLCA). At the time of writing a copy of *Defining the special qualities of local landscape designations in Aylesbury Vale District’ (Final Report, 2016)* was not available. This LVA therefore uses the sensitivity description of the relevant LCA from AVLCA that coincide with parts of the AAL in the study area where these were available. These are listed below.

- LCA 5.11 Thame Valley – LCA 5.11 coincides with the river Thame valley and is the closest part of the AAL to the Site. It is described as being of Moderate sensitivity with the following key characteristics:
 - *“Shallow valley landform*
 - *Meandering river*

- *Meadows*
- *Predominantly pastoral*
- *Low density of woodland cover*
- *Small scattered woodlands.”*

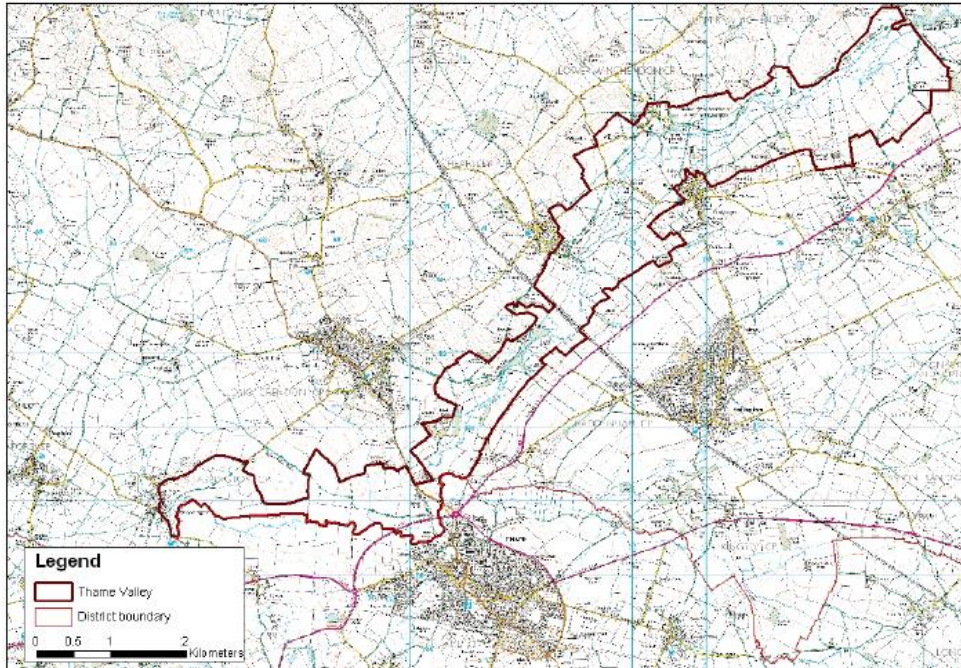


Figure 2.6: Map extract – LCA 5.11 Thame Valley¹⁰

- LCA 8.11 Peppershill Arable – LCA 8.11 lies to the north of the river Thame valley and the Thame Valley Walk coincides with it where the route meets Long Crendon Road. It is described as being of Moderate sensitivity with the following key characteristics:
 - *“Gently sloping landform*
 - *Good hedgerow pattern*
 - *Predominantly arable*
 - *Low density of woodland cover*
 - *Low settlement density Predominantly pre 18th century enclosure.”*

¹⁰ From Aylesbury Vale District Council and Buckinghamshire County Council, (2008) Aylesbury Vale Landscape Character Assessment

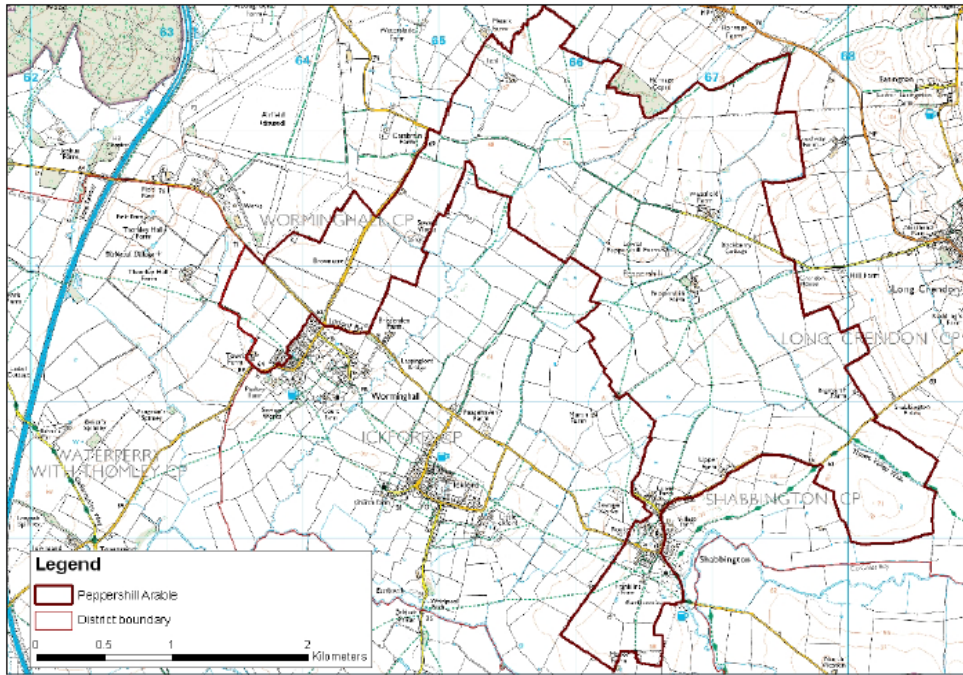


Figure 2.7: Map Extract – LCA 8.11 Peppershill Arable¹¹

- LCA 9.8 Chilton Ridge – this LCA coincides with the south facing slopes of the river Thame Valley to the north of the Site and includes the higher ground at Long Crendon and north to the village of Chilton. It is described as being of Moderate sensitivity with the following key characteristics:
 - *“Small well defined ridge*
 - *Steep ridge sides*
 - *Good views in all directions*
 - *Villages of Long Crendon and Chilton*
 - *Predominantly pastoral*
 - *Low level of woodland cover*
 - *Settlement along ridge top*
 - *Large areas of early enclosure*
 - *Open character.”*

¹¹ From Aylesbury Vale District Council and Buckinghamshire County Council, (2008) Aylesbury Vale Landscape Character Assessment

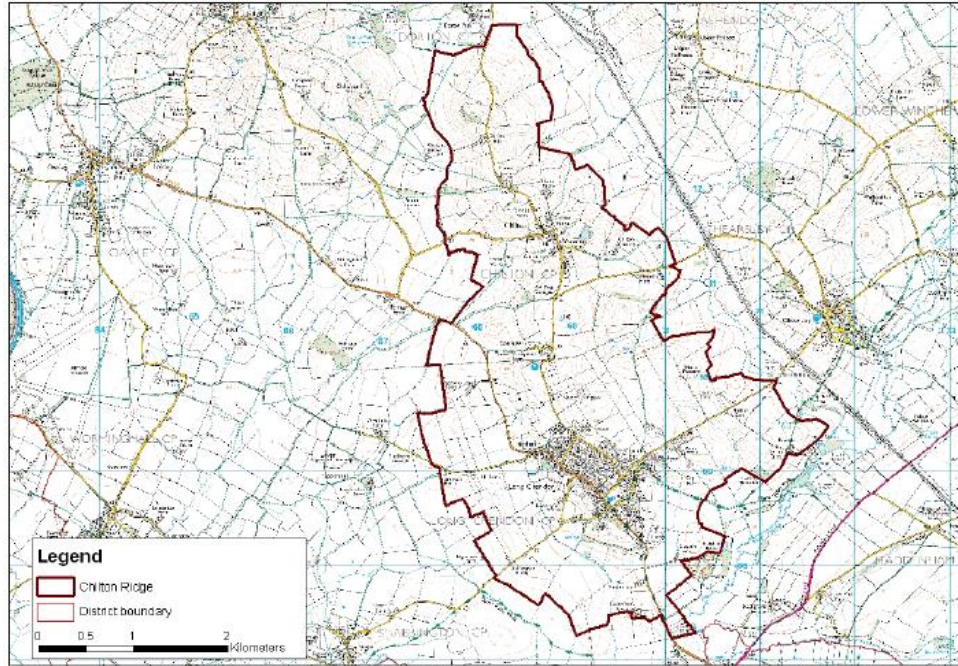


Figure 2.8: Map Extract – LCA 9.8 Chilton Ridge¹²

¹² From Aylesbury Vale District Council and Buckinghamshire County Council, (2008) Aylesbury Vale Landscape Character Assessment

3 ANALYSIS OF THE SITE AND ITS LANDSCAPE CONTEXT

Overview

- 3.1 The Oxford Road Site lies immediately to the west and east of Thame Meadows residential development on the western outskirts of Thame and between 0.75km and 1.5km to the west of the town centre. The western part of the Site lies between Offa Place and the A418 with the eastern part lying between Weavers Branch and Cuttle Brook and adjacent Thame Conservation Area.
- 3.2 The Site is set within a peri-urban landscape the character of which is influenced by the A418 and the large roundabout to the south of the Site. It is also influenced by Thame Meadows residential development and the wooded valley of Cuttle Brook.
- 3.3 The Site comprises of arable and pasture fields. The western and southwestern part of the allocation area coincides with a single large field that lies adjacent to the A418 to the west and Oxford Road to the south. The field boundary with the adjacent field to the east is a post and wire fence. The northern and eastern fields are small to medium in size with hedge boundaries merging into a woodland edge on the eastern side adjacent to Cuttle Brook valley.

Topography

- 3.4 The Site is situated on gradual north facing slopes of a broad, shallow ridge that extends from Cuttle Brook in the east to the river Thame in the west with the ridge reaching an altitude of approximately 80m Above Ordnance Datum (AOD) to the southeast of the site and immediately north of Rycote Lane Business Park. Cuttle Brook is a shallow but well-defined valley that curves around the eastern and north-eastern edges of the Site.
- 3.5 To the north and northwest of the Site the land falls gradually to the river Thame valley, which is orientated east-west draining west to the village of Shabbington. To the north of the river Thame the land rises gradually merging with a broad ridge of slightly steeper land that rises to 142m AOD beyond the study area to the north of Long Crendon in the Vale of Aylesbury District. To the south of the Site the topography is more undulating and irregular with areas of gradually sloping or level land between rounded hills and plateaux.

Land Cover and Land Use

- 3.6 Adjacent to the Site there are small blocks of woodland associated with Cuttle Brook. There is no Ancient Woodland adjacent to the Site, although at the confluence of Cuttle Brook and the river Thame there is a small area of Priority Habitat Inventory (PHI) Deciduous Woodland. Beyond the valleys of Cuttle Brook and the river Thame, land cover is mainly arable and pasture farmland with trimmed, gappy hedge field boundaries and post and wire boundaries. There are occasional small woodland copses. In the wider area there are small villages such as Moreton to the south and larger villages such as Shabbington to the west.
- 3.7 Oxfordshire Golf Club course lies to the southwest of Moreton and to the west of that Rycote Park is an extensive estate of parkland, woodland and lakes that is not on the inventory of Registered Parks and Gardens (RPG). Thame Park RPG is to the southeast of Moreton and occupies an extensive area characterised by woodland and parkland arranged around a group of listed buildings including Grade I listed Thame Park House.
- 3.8 The market town of Thame extends eastward from the Site and also to the south where the residential area of Chiltern Vale is located, which includes Thame Leisure Centre and Lord William's Upper School with associated hard and soft play pitches and courts with floodlighting.

- 3.9 In general, the combination of mature hedges, belts and blocks of woodland and the undulating topography gives the perception of a well wooded landscape to the south and east where visual character fluctuates between short and long range views. To the west and north the land is more elevated and open giving long distance views.

Access and Rights of Way

- 3.10 The Site is located at the transition between urban fringe and rural countryside. The A418 to the west of the Site is a relatively fast and busy road without an underpass or overbridge along the 2km stretch between the roundabout to the southwest of the Site and the northern roundabout at Travelodge. The A418 acts as a barrier to pedestrian and vehicular movement to the west and north. Oxford Road is a thoroughfare to the south of the Site that connect Thame Meadows residential development to the wider road network and provides access to the town centre.
- 3.11 There are no PRoW crossing the Site or passing along its boundaries or land nearby. There is a PRoW (383/6/10) to the south of the Site that passes between a residential area in the east and schools to the west connecting with National Cycle Network (NCN) route 57 and the PRoW network around the village of Moreton. PRoW 383/5/10 is approximately 250m to the southeast of the Site in Cuttle Brook Local Nature Reserve (LNR).
- 3.12 To the north of the Site and to the north of the A418 the Bernwood Jubilee Way and Thame Valley Walk promoted path passes within 0.4km of the Site traversing gradually rising ground on the north side of the river Thame valley before descending to the valley floor near Shabbington.
- 3.13 There are few other motorised or non-motorised transport routes in the vicinity of the Site.

Settlement Pattern

- 3.14 The Site lies adjacent to Thame Meadows residential development on the western fringes of Thame. Thame is an historic market town with a large Conservation Area that extends into a residential area opposite the Site. The historic core of the town is arranged along two parallel roads that run northwest-southeast. The majority of Thame is post-war housing that extends mainly to the east where the B4012 and A4129 delineate the settlement edge. Cuttle Brook valley provides a green gap in the built-up area between the Site and the main part of Thame. To the south of the former railway line, now the route of NCN 57, there are large industrial units and recent housing development forming an irregular permeable southern edge to the town.
- 3.15 Thame is set within a large expanse of undulating countryside with no other settlements of similar size in the LVA study area. The nearest larger settlement is Aylesbury 12km to the northeast with Oxford 13km to the west. In the intervening rural area, there are numerous hamlets and villages including the small Conservation Area of Moreton 1km to the south of the Site, Shebbington 2.6km to the west and Long Crendon 2km to the north. Farmsteads and rural dwellings are infrequent.

Cultural Heritage Assets

- 3.16 The nearest Conservation Area is Thame Conservation Area which lies adjacent to the southern boundary of the Oxford Road allocation area. The Conservation Area Appraisal (CAA) shows an area of 'Important open space' immediately to the southeast of the Site and adjacent to Cuttle Brook. The CAA describes Cuttle Brook as providing "...an important open space and views into fields on either side of Oxford Road."
- 3.17 Moreton Conservation Area is approximately 1km to the south. The CAA dated 2011 states: "There are relatively few notable views into or out of the village within the existing conservation area, due to the flat topography but the open land behind Alder's Farm provides a good view to the church tower from this side of the village and out to Wittenham Clumps to the north. Attractive

views can also be gained of the church from the proposed extensions to the conservation area, particularly to the southeast and southwest.”

- 3.18 There are three Grade II Listed Buildings at Coxbridge Farm 0.1km to the southwest of the Site at Town Farm Close. The majority of other Listed Buildings within 1km are associated with Thame Conservation Area and just beyond 1km in Moreton Conservation Area.

Visual Analysis

- 3.19 The location of the Site on a broad ridge means there are views towards it from the north and west and views into it through the gap formed by Cuttle Brook. Views from the north are mainly from the Thame Valley Walk. There are short range views of the ground plain of the Site from Oxford Road and glimpsed views from the A418 adjacent to the western boundary.
- 3.20 From the south views are truncated by vegetation and the undulating topography with views influenced by scattered dwellings, farm buildings and West Coast Business Park creating a peri-urban character.

Visual Appraisal

Introduction

- 3.21 The extent to which the Site is visible from the surrounding landscape is based on grading of degrees of visibility. It is determined from a visual inspection of the Site and its context from roads, public rights of way and properties.
- 3.22 Seasonal change in existing evergreen and deciduous plant material will affect the available views. Typically views will be different through the seasons with a greater sense of enclosure in the summer months when deciduous trees are in leaf.
- 3.23 **Figure 2** shows a ZTV map and the location of representative viewpoints used to analyse visibility of the Site from the immediate environs and local landscape. The photographs 1-7 describe each of these views. The text below is to be read alongside the photos.

Residential Receptors

- 3.24 The western and eastern development areas are adjacent to the Thame Meadows development. Residents of Offa Place, Causeway Close, Henge Court and Roman Way currently experience views across the open fields of the western development area as shown by Viewpoints 5 and 6. In views from Offa Place woodland associated with Cuttle Brook is visible in the middle ground with the horizon formed by a broad ridge on the north side of the river Thame valley. The open fields of the Site provide separation from the A418 that passes approximately 200m to the northwest of Offa Place.
- 3.25 Residents of Henge Court experience open views across the southern part of the western development area to a tall hedge growing parallel to the east side of the A418. Tall vehicles using the A418 are visible from Henge Court above the roadside hedge and the hills beyond are glimpsed above the hedge which largely truncates low level longer distance views.
- 3.26 Residents of Roman Way experience oblique views across the southern part of the western development area as shown in Viewpoint 6. Houses off Oxford Road and at Highfield Close to the west of Lord Williams Upper School entrance are visible. Lighting columns at the roundabout to the southwest of the Site are noticeable above intervening vegetation growing alongside the A418 and farm buildings at New Town Farm on the west side of the A418 are discernible above intervening hedges. There are glimpses of a distant horizon which is more evident in views across the western development area.

- 3.27 On the eastern side of the Thame Meadows development residents of Weavers Branch, Drovers Crescent and the east side of Offa Place experience views across open fields of the eastern development area to the wooded backdrop of Cuttle Brook. Viewpoint 4 is a typical view showing the small-scale fields of the eastern development area enclosed by post and rail fences. A mature hedge with a gap to the north of the eastern development area allows views through to another field and beyond to rural dwellings and farmsteads at Mead Farm, Lopemedede Farm and the driving range at Southfield.
- 3.28 The eastern development area is also visible to residents at the eastern end of Town Farm Close and residents of Town Farm Lane and Cuttle Brook Gardens immediately to the south of the Site. These residents currently experience views of small-scale fields enclosed by post and rail fences against a backdrop of woodland associated with Cuttle Brook valley. Viewpoint 3 shows a view from Oxford Road with dwellings on the east side of Cuttle Brook Gardens visible in the foreground. It shows the context to the existing dwellings and illustrates the layers of meadow, pasture fields, woodland and hedges that channel views into Cuttle Brook valley.
- 3.29 Residents off Oxford Road and on Highfield Close to the west of the entrance to Lord Williams Upper School experience glimpsed views of the western development area through gaps in the hedge that runs along the north side of Oxford Road.
- 3.30 To the east of the Site there is a residential area that is largely screened from the eastern development area by woodland at Cuttle Brook. There may be glimpses of the Site in winter.
- 3.31 Given the fairly level topography to the south of Oxford Road and screening by woodland at Cuttle Brook to the east, there are no views of the Site from the majority of Thame.
- 3.32 The nearest dwellings in the rural areas to the north and west of the Site are those at Mead Farm (0.55km to the northeast); Southfield (0.75km to the northeast) and Lopemedede Farm (0.9km to the north) and Abbey Farm (1.9km to the west). Views of the Site from the rural dwellings to the north are interrupted by layers of hedgerow and woodland in the intervening landscape. The ground plain of the Site is therefore not readily discernible. There is an open, elevated outlook at Abbey Farm at approximately 78m AOD compared to 63-69m AOD at the western development area. There are no views of the ground plain of the Site from Abbey Farm.

Receptors Using Roads

- 3.33 The A418 passes a short distance from the western development area to the west. As mentioned above, a hedge runs parallel to the A418 on its eastern side. There are views of the ground plain of the Site from the A418 through field entrances and hedge gaps. The ground plain of the eastern development area is less noticeable due to screening by hedge field boundaries. Viewpoints 1 and 2 illustrate existing views from the A418.
- 3.34 Oxford Road runs to the south of the Site and is approximately 340m from the western development area and 65m from the eastern development area at its closest point. The ground plain of the western development area is not visible from Oxford Road. Viewpoint 3 indicates that the ground plain of the eastern area is visible at Cuttle Brook to the east of Cuttle Brook Gardens.
- 3.35 In the wider area there may be glimpsed views of the ground plain of the western development area from elevated parts of Long Crendon Road near Red House Farm approximately 2km to the northwest. There are also glimpsed views from the B4011 between Long Crendon and Thame. In both cases layers of intervening hedgerow and woodland largely interrupt views of the ground plain of the Site.

Receptors Using PRow

- 3.36 As mentioned in Section 3.4 there are no PRow crossing the site or in the immediate vicinity. The Site is not visible from PRow 383/6/10 due to screening by intervening buildings and vegetation.

The Site is not visible from PRoW 383/5/10 to the southeast in Cuttle Brook LNR due to screening by vegetation growing in the LNR and by buildings on the north side of Oxford Road at Cuttle Brook Close.

- 3.37 Views of the Site from the Bernwood Jubilee Way and Thame Valley Walk promoted path are intermittent due to layers of hedges and woodland that interrupt views such that glimpses only may be obtained. From north-western parts of the route where it crosses a broad ridge crest, the convex landform obstructs views towards the site. The Site is readily discernible from an elevated 500m stretch of the route aligned in the direction of the Site. Viewpoint 7 indicates that views in summer are truncated by vegetation although winter views will be more open.

Viewpoint Analysis

Viewpoint 1 A418 Northwest of Oxford Road Site

- 3.38 The viewpoint is located at a field entrance on the A418 and is typical of views that may be obtained by northbound road users. The land rises gradually towards the Thame Meadows development which is very noticeable at a high point on the horizon and sloping down to mature hedges and trees to the north. It forms an abrupt edge feature to the otherwise rural context to the view. The immediate context to the viewpoint is open arable land with an enclosed character due to the rising ground, built form at the Thame Meadows development and mature trees and hedges that form the horizon in the middle distance.

Viewpoint 2 A418 West of Oxford Road Site

- 3.39 The viewpoint is located at a field entrance on the A418 and is typical of views that may be obtained by northbound road users. The land rises gradually to the Thame Meadows development which forms an abrupt edge and break in the horizon. To the south of the Thame Meadows development mature trees associated with Lord Williams Upper School are visible. The roofs of houses on the south side of Oxford Road and lighting columns are visible. To the north of the Thame Meadows development the view opens out to a distant horizon.

Viewpoint 3 Oxford Road at Cuttle Brook

- 3.40 Viewpoint 3 is positioned on the pedestrian footway on the north side of Oxford Road where there is a gap in built form at Cuttle Brook allowing views into an area of farmland and woodland. Houses at Cuttle Brook Gardens form an irregular edge to this space which is defined by woodland at Cuttle Brook which channels views into the space. The viewpoint is in Thame Conservation Area the CAA for which mentions the importance of the area of open space in the foreground of the view and views of fields beyond.

Viewpoint 4 Weavers Branch

- 3.41 The viewpoint is located at Weavers Branch in the eastern part of Thame Meadows. The edge of the Thame Meadows development is visually permeable comprising of low post and rail fences and low growing shrubs with occasional trees. This allows views out into an area of small-scale fields against a backdrop of woodland at Cuttle Brook. There are medium distance views through gaps in adjacent field boundaries to fields beyond the immediate locale. The woodland at Cuttle Brook provides a well-defined edge feature and the small-scale fields and meadows with post and rail fences provide a naturalistic valley setting to the existing development.

Viewpoint 5 Offa Place

- 3.42 The viewpoint is situated at the north-western edge of the Thame Meadows development. The outlook is open and relatively expansive given the slightly elevated location looking across gradually downward sloping land towards the north side of the Thame valley. The skyline is formed by a ridge line to the south of Long Crendon with the more distant horizon formed by more elevated land at the village of Brill 7km to the northwest. The existing Thame Meadows development forms an abrupt edge to the open land across which the views are focussed.

Viewpoint 6 Roman Way

- 3.43 The viewpoint is located to the southwest of the existing Thame Meadows development. It is influenced by houses off Oxford Road, lighting columns at the A418 roundabout, traffic on the A418 and farm buildings visible on the west side of the A418. The are views outward to distant elevated land.

Viewpoint 7 Thame Valley Walk

- 3.44 The viewpoint is located on a stretch of the Thame Valley Walk between Thame Road, south of Mead Farm in the east and Long Crendon Road. The viewpoint is typical of views that are experienced from the route where it nears the Site. The topography is fairly level and the course of the river Thame is not visible. Houses at Offa Place in the Thame Meadows development are discernible through intervening trees and woodland and buildings at West Coast Business Park are visible approximately 1.4km to the south. The view is strongly influenced by the level, open fields with irregular groups of trees and gappy hedges. This creates a medium to large scale expansive view.

Conclusions

- 3.45 The Site is set within a landscape that is characterised by a mix of rural elements such as woodland, hedges and pasture fields. It is also influenced by development such Thame Meadows residential development, agricultural buildings at New Town Farm and the education and leisure buildings to the south of Oxford Road. The A418 also influences the character and context to the Site.
- 3.46 The Site's position on a broad ridge means that there is a more rural character on the north side of the ridge beyond the A418 while the southern side is more influenced by development. The two sides of the ridge also have differing visual contexts. The northern side is more open to views from the north albeit truncated to a degree by the broad convex ridge top. From the southern side of the ridge the Site is visually enclosed by vegetation, and it is only from more elevated areas to the south of Moreton and in Thame Park RPG where partial, glimpsed views of the Site may be obtained.

4 POTENTIAL EFFECTS OF THE DEVELOPMENT

Landscape Effects

- 4.1 This section assesses the potential effects of the proposed development as set out in Figure 1.2 in this report. A nominal building height of 9m is considered which is comparable to the height of dwellings in the existing Thame Meadows development. The nature and scale of development relative the baseline are the main factors to consider when assessing effects on landscape character and landscape fabric.

Landscape Fabric

- 4.2 The western development area would result in the loss of agricultural land with limited loss of field boundaries. Figure 1.2 indicates that development in the western area would add new trees at the edges of the development area and internally along streets.
- 4.3 Overall, the loss of landscape fabric would be neutral at the western development area.
- 4.4 The eastern development area would result in the loss of meadows and pasture and a hedge that crosses the Site from west to east. There would be loss of other field boundaries. Figure 1.2 indicates that new trees would be planted at the edges of the development and internally along streets.
- 4.5 Overall, the loss of landscape fabric would be adverse due to the loss of an intact hedge, the loss of meadows and other field boundaries that would not be replaced.

Landscape Character

- 4.6 As mentioned in Section 2 most of the Site is located in the Undulating Open Vale LT. Landscape character at the western development area is typical of Undulating Open Vale LT. Given the influence of existing development and the presence of the A418, development in the western site at Oxford Road could largely be accommodated without substantial loss of landscape features important to baseline landscape character of Undulating Open Vale LT. Development in the western area would result in change of landscape character from open fields and views across to the elevated ridges to the north, to a residential development. The proposed development would be a notable new feature of the landscape in that locality. While landscape planting would be introduced to soften the edge of the built form, the elevated location means that some parts of the western development would appear incongruent with the established pattern of development at the edge of Thame, which is generally on lower lying land within a framework of existing green infrastructure.
- 4.7 Overall, the impacts of development in the western area on landscape character of Undulating Open Vale LT would be adverse and could not be fully mitigated.
- 4.8 Landscape character at the eastern development area is typical of Flat Floodplain Pasture LT and while the eastern development area does not wholly coincide with Flat Floodplain Pasture LT it has a functional and visual relationship particularly where the LT widens to the north at the confluence of Cuttle Brook and the river Thame. Development in the eastern part of the Oxford Road Site would impinge upon Flat Floodplain Pasture LT resulting in an abrupt transition between the urban edge and the naturalistic, small-scale floodplain and wooded valley landscape of Cuttle Brook. Cuttle Brook and views from Thame Conservation Area where it coincides with the valley are important in providing physical separation between urban areas in Thame and maintaining physical and visual permeability in an area sensitive to inappropriately sited or designed development.

- 4.9 Development in the eastern part of the Site would result in the loss of field boundaries, the small-scale field pattern in this part of the Cuttle Brook green corridor and result in the loss of open views out from Oxford Road along the woodland at the edge of Cuttle Brook. There would be a complete change in landscape character at the development area and further change in the area to the north where 'accessible parkland with wetland habitat', is proposed in the Concept Masterplan shown on Figure 2.3 in this report.
- 4.10 Overall impacts of development in the eastern area on Undulating Open Vale LT and Flat Floodplain Pasture LT would be adverse and could not be mitigated. The nature of the impacts would result in considerable and irreversible change to a small-scale field system and naturalistic river valley.
- 4.11 Landscape character areas (LCA) in Vale of Aylesbury would be indirectly affected by development at the Site. Three LCA are considered in this LVA as they are closest to the Site with LCA 5.11 and 9.8 coinciding with the locally designated AAL.
- 4.12 LCA 5.11 Thame Valley would not be physically affected by development at the Site. The description of the LVA indicates there are views to historic village edges and also 'intrusive elements' such as roads and traffic between Long Crendon and Thame. The "*greatest area of visual appeal*" is described as being "...generally close to the meandering river where the bank side vegetation, historic buildings such as mills and bridges, and a range of habitats create a rich and lively landscape." Development at the Site would impinge upon part of the LCA at the confluence of Cuttle Brook and the river Thame. Development would also further influence that part of the LCA that is closest to the western development area where the A418 is already an influencing feature. Development at this elevated part of the Site would be noticeable from the Thame Valley Walk that passes through the LCA increasing the influence of housing development on landscape character.
- 4.13 Overall, the impacts of development at the Site would be adverse. The scale and prominence of development in the western part of the Site and the change in character of land adjacent to the LCA would alter the transition between the rolling farmland and river valley landscapes.
- 4.14 LCA 8.11 Peppershill Arable is approximately 1km to the northwest of the Site at its closest point. The description of the LCA notes that there is very little settlement and few roads coinciding with the LCA which gives its central part a remote and hidden quality. Thame Valley Walk passes through the eastern part of the LCA and there would be views of development in the western area of the Site from elevated parts of the route. Development would have a limited influence on LCA 8.11 although it would result in adverse impacts to a degree due to the relative prominence of development in the western part of the Site and the consequent increase in housing and loss of rural farmland that forms part of the view composition from Thame Valley Walk.
- 4.15 The overall impacts on LCA 8.11 would be adverse.
- 4.16 LCA 9.8 Chilton Ridge is approximately 0.65km to the northeast of the Site at its closest point. It coincides with higher elevation land rising from the Thame Valley to Long Crendon and beyond to the village of Chilton. The ZTV shown on **Figure 2** indicates theoretical visibility of development at the Site from the southern and southwestern part of the LCA coinciding with the AAL. While actual visibility is likely to be reduced by intervening layers of hedges and woodland interrupting views, from more elevated areas development would be noticeable due to the prominent nature of development in the western area extending a ribbon of development into open countryside.
- 4.17 While the influence of development on LCA 9.8 Chilton Ridge would be limited the overall impacts would be adverse due to it being relatively conspicuous.
- 4.18 In terms of impacts on landscape character the CALA Homes site at Moreton Lane (THA9.2) would:
- Avoid impinging upon the small-scale valley of Cuttle Brook

- Contain development in a low-lying area in a setting of existing Green Infrastructure which would be retained and enhanced
- Allow the settlement of Thame to expand while incorporating a buffer to the adjacent countryside
- Create a permeable settlement edge making use of and augmenting existing Green Infrastructure.

Landscape Designations

- 4.19 As discussed in Section 4.1.2 development at the Site would result in adverse impacts on LCA that coincide with the AAL that lies adjacent to the Site to the north. The impacts on LCA would also affect the AAL which is locally designated for its scenic qualities. Views within and out from the AAL would be influenced by development at the Site resulting in adverse impacts on the scenic quality of the AAL. The relatively prominent location of development in the western part of the Site and the proposed approach to development as shown in the Concept Masterplan (Figure 2.3) would result in a very noticeable ribbon of development extending into open countryside.
- 4.20 The overall impacts on the AAL would therefore be adverse.
- 4.21 The ZTV indicates theoretical visibility of the proposed development from Thame Park RPG. Actual visibility is likely to be reduced by intervening layers of hedges and smaller areas of woodland interrupting views. The proposed development may be discernible from more elevated parts of the RPG in the south at distances of 2.8km and greater. Given the distance to the RPG, the degree of visibility and the fact that the proposed development would be seen in the context of existing housing at Thame Meadows and intervening development south of Oxford Road, impacts on Thame Park RPG are unlikely to be adverse in the context of its contribution to landscape character and views.
- 4.22 Thame Conservation Area is adjacent to the eastern development area. The CAA indicates that views from Oxford Road across an area of open space to the north in Cuttle Brook valley are important to the Conservation Area. Development in the eastern part of the Site would alter the character and composition of views across this area of open space. Views to the fields and countryside beyond would be truncated by housing and the sense of separation between the main part of the town to the east and the western part of Oxford Road provided by Cuttle Brook would be substantially reduced.
- 4.23 The impacts on Thame Conservation Area would therefore be adverse.
- 4.24 In terms of impacts on landscape designations the CALA Homes site at Moreton Lane (THA9.2) would:
- Avoid adverse impacts on Thame Conservation Area
 - Avoid adverse impacts on Moreton Conservation Area
 - Avoid impacts on any designated landscapes.

Visual Effects

Residential Properties

- 4.25 As mentioned in Section 3.8.2 of this LVA residents of the existing Thame Meadows development experience open views out across the surrounding countryside and also relatively enclosed and small-scale views adjacent to Cuttle Brook. The open views currently experienced by residents of Offa Place, Causeway Close and Henge Court would be truncated by development in the western part of the Site. Residents of Roman Way would experience oblique views of development which

would increase the sense of enclosure already experienced as a result of the hedges alongside the A418 and Oxford Road.

- 4.26 The overall impacts on residents in this part of Thame Meadows would be adverse.
- 4.27 Residents on the eastern side of Thame Meadows development experience shorter range views with an enclosed and naturalistic outlook across small-scale fields and meadows with post and rail boundaries and hedge boundaries to the backdrop of woodland at Cuttle Brook. Development in the eastern area would completely alter views for residents of Weavers Branch and Drovers Crescent resulting in a more suburban outlook of housing and open space.
- 4.28 The overall impacts on residents in this part of Thame Meadows would be adverse.
- 4.29 Residents at the eastern end of Town Farm Close and residents of Town Farm Lane and Cuttle Brook Gardens also experience small-scale views characterised by meadows and woodland at Cuttle Brook with longer distance views through hedge gaps into the surrounding countryside. Development in the eastern part of the Site would result in the loss of open views to the north for residents of Town Farm Lane and Cuttle Brook Gardens. These residents would be encircled by housing development and roads. Residents at the eastern end of Town Farm Close would experience a loss of openness to their views east.
- 4.30 The overall impacts on residents at the eastern end of Town Farm Close and residents of Town Farm Lane and Cuttle Brook Gardens would be adverse.
- 4.31 Residents along Oxford Road and at Highfield Close are unlikely to experience adverse impacts and in the wider area, while the proposed development may be discernible, it would have a limited influence on existing views from residential properties in the open countryside.

Receptors using roads

- 4.32 Users of the A418 generally travel at higher speeds as the road has a 60 mile per hour speed limit. Views from the road are restricted by hedges on either side although there are hedge gaps at field entrances on the south side that will provide views of development in the western area. There are views of the existing development at Thame Meadows which is set back from the A418 and does not impinge upon the rural character of the road as it bypasses the western and northern parts of Thame. While there are lighting columns along part of the A418 at the approach to the roundabout to the south of the Site, the character of the road is rural with views of fields on the southern side and open countryside to the north.
- 4.33 Development in the western part of the Site would encroach upon the A418 increasing the proximity of the urban edge to the road. This would be perceived as a break in the rural character of views experienced between the roundabout to the south of the Site and the roundabout on the north side of Thame at Travelodge.
- 4.34 The overall impact on users of the A418 is therefore considered to be adverse.
- 4.35 Users of Oxford Road travel to and from the centre of Thame passing Cuttle Brook and the eastern development area. Cuttle Brook is a notable gap in built form and there are views south into the LNR from Oxford Road and views north to meadows, fields and open countryside with housing at Cuttle Brook Gardens forming an irregular, low density edge to housing in this area. Views from the western part of Oxford Road open out to views of fields through gaps in hedge to the north and glimpsed views of countryside to the west.
- 4.36 Development in the eastern part of the Site would be seen as infilling the area beside Cuttle Brook that is visible in views north from Oxford Road. Section 4.1.3 discusses the contribution views from Oxford Road make to Thame Conservation Area as evidenced by the description in the CAA. In general views from Oxford Road would be adversely affected by development in the eastern area of the Site due to the loss of open views north into an area of meadows, fields and countryside channelled by woodland at Cuttle Brook.

Receptors using PRow

- 4.37 As mentioned in Section 3.8.4 the Site is not visible from nearby PRow in Cuttle Brook LNR (PRow 383/6/10) to the south and PRow 383/5/10 that connects Oxford Road with NCN route 57 to the south and the wider PRow network around the village of Moreton. These PRow would be unaffected by the proposed development.
- 4.38 The proposed development would be visible from the Thame Valley Walk, particularly the more elevated section to the southeast of Long Crendon Road. The proposed development would be glimpsed from the Thame Valley Walk where it passes closest to the proposed development immediately to the north of the A418. Views would be more open in winter.
- 4.39 There would be adverse impacts on the visual amenity of users of Thame Valley Walk.
- 4.40 The ZTV shown on **Figure 2** indicates that the proposed development would theoretically be visible from PRow in the wider area at distances of 1.8km or greater. Actual views would be interrupted by hedges and trees such that the proposed development would have a limited influence on visual amenity particularly in views from the south around Moreton where the proposed development would be seen in the context of existing development.
- 4.41 In terms of impacts on visual receptors the CALA Homes site at Moreton Lane (THA9.2) would:
- Avoid adverse impacts on Thame Valley Walk
 - Avoid substantial changes to the amenity of nearby residents
 - Minimise impacts on NCN route 57
 - Offer good connections to Thame town centre and the surrounding countryside for cyclists and pedestrians.

5 CONCLUSIONS

- 5.1 This LVA has examined the potential landscape and visual impacts of development at a proposed housing allocation site at Oxford Road as set out in the Thame Neighbourhood Plan 2020-2035 Consultation Draft (TNP2). The LVA has assessed the potential effects of a Concept Masterplan shown in TNP2 and in Thame Neighbourhood Masterplanning Report prepared by AECOM in March 2023 for Thame Town Council. The LVA is informed by the methodology shown in Appendix A and is intended to provide an assessment of the nature of impacts and whether these are adverse rather than significant or not significant.
- 5.2 The assessment identified adverse effects on the following landscape receptors:
- Landscape fabric in the eastern development area
 - Undulating Open Vale LT
 - Flat Floodplain Pasture LT
 - LCA 5.11 Thame Valley
 - LCA 8.11 Peppershill Arable
 - LCA 9.8 Chilton Ridge
 - Vale of Aylesbury Area of Attractive Landscape to the north of the proposed development
 - Thame Conservation Area
- 5.3 The adverse impacts on landscape result from the relatively prominent location of the western development area and its proximity to areas of recognised scenic quality. The proposed development would create a ribbon of development extending into open countryside and would be uncharacteristic of the pattern of development at the edge of Thame resulting in adverse impacts on landscape character. The eastern part of the proposed development would occupy an area of small-scale landscape with small fields, meadows and a river valley character associated with Cuttle Brook. Development would adversely change the character of this area and result in the loss of part of a small-scale valley landscape.
- 5.4 The assessment identified adverse effects on the following visual receptors:
- Residents of Offa Place, Causeway Close, Henge Court and Roman Way
 - Residents of Weavers Branch and Drivers Crescent
 - Residents of Town Farm Close, Town Farm Lane and Cuttle Brook Gardens
 - User of the A418
 - Users of Oxford Road at Cuttle Brook
 - Users of Thame Valley Walk
- 5.5 The adverse impact on visual receptors would result from the loss of open views from existing residential areas at Thame Meadows and in particular in the eastern part of the development where the small-scale composition of views is sensitive to the scale of change proposed. Residents to the south of the eastern development area would experience a loss of open views to the north resulting in a considerable change to visual amenity as this is the only open outlook from the majority of the properties at Town Farm Lane and Cuttle Brook Gardens.
- 5.6 The character of the A418 would change adversely from a largely rural outlook to an urban edge character along part of the route. At Oxford Road the composition of views north from the section at Cuttle Brook would change adversely from views of a small-scale field pattern and wooded valley character to housing and formal planting and open space giving an abrupt transition to the wooded Cuttle Brook corridor. Users of Thame Valley walk would experience adverse effects

resulting from views of the proposed development which would appear to impinge upon the valley and be uncharacteristic of views to the south and southeast.

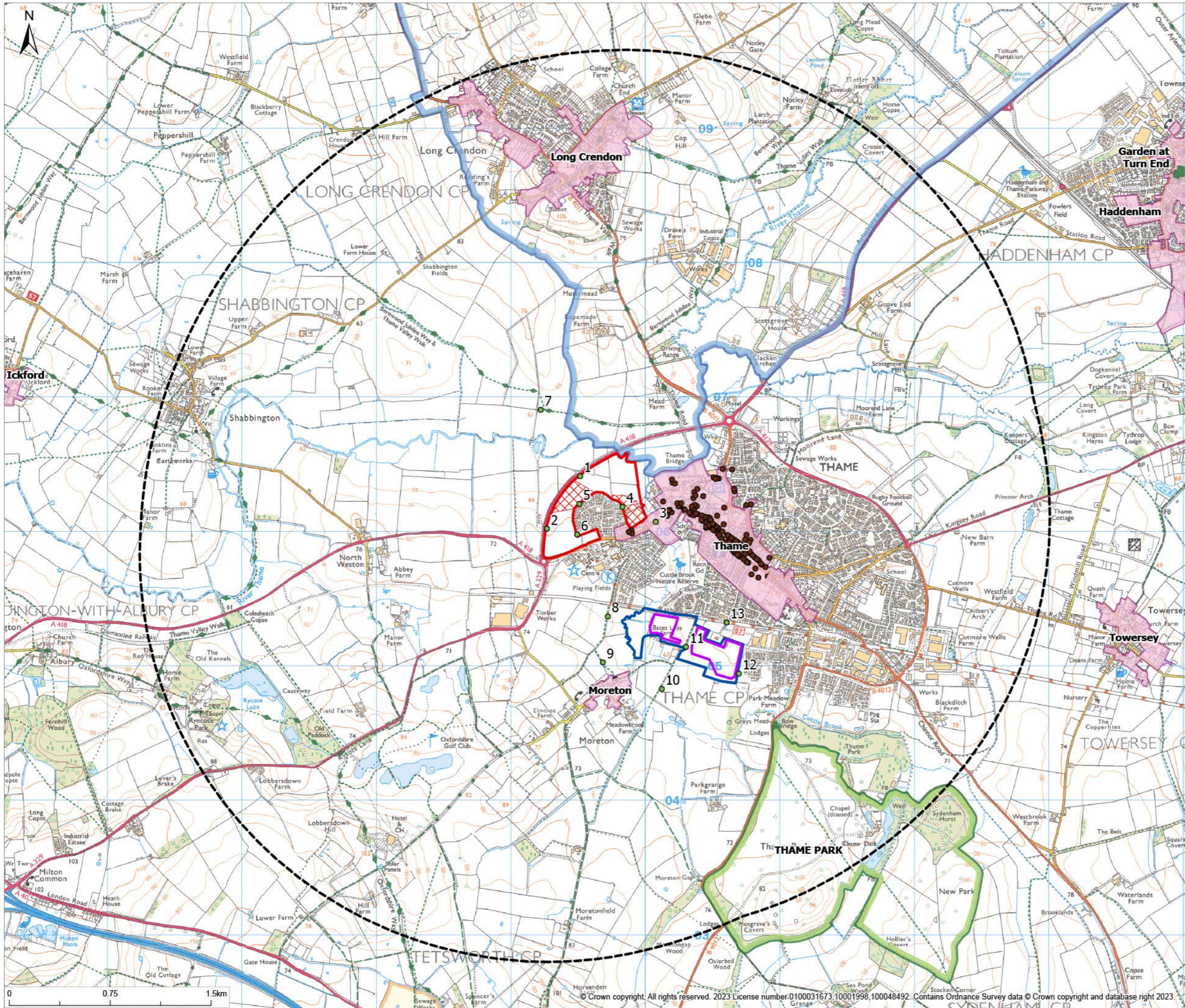
5.7 Overall, the impacts of development at Oxford Road would result in permanent adverse change to an area of transitional landscape character between undulating farmland and small-scale valley landscapes.

5.8 The CALA site to the south of Thame is identified in South Oxfordshire Council's (2017) Landscape Capacity Study as potentially being able to accommodate up to 330 dwellings on land to the west of the existing Persimmon Homes development which was completed in 2021. While there would be limited localised impacts on landscape character and visual amenity it is considered that, if developed in accordance with the illustrative masterplan shown on Figure 1.3, the CALA site would:

- Avoid impinging upon the small-scale valley of Cuttle Brook
- Avoid adverse impacts on Thame Conservation Area
- Avoid adverse impacts on Moreton Conservation Area
- Avoid impacts on any designated landscapes
- Avoid adverse impacts on Thame Valley Walk
- Avoid substantial changes to the amenity of nearby residents
- Minimise impacts on NCN route 57
- Contain development in a low-lying area in a setting of existing Green Infrastructure which would be retained and enhanced
- Allow the settlement of Thame to expand while incorporating a buffer to the adjacent countryside
- Create a permeable settlement edge making use of and augmenting existing Green Infrastructure
- Offer good connections to Thame town centre and the surrounding countryside for cyclists and pedestrians



FIGURES



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- Legend**
- Oxford Road Site Boundary
 - East and West Sites
 - 3 km Buffer
 - CALA Site Boundary
 - Development Areas
 - Area of Attractive Landscape - Aylesbury
 - Registered Parks and Gardens
 - Conservation Area
 - Listed Building (within 1 km)
 - Viewpoints

Rev	Description	By	CB	Date



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Client **CALA Homes Limited**

Project **Land at Thame**

Title **Landscape Planning Related Designations**

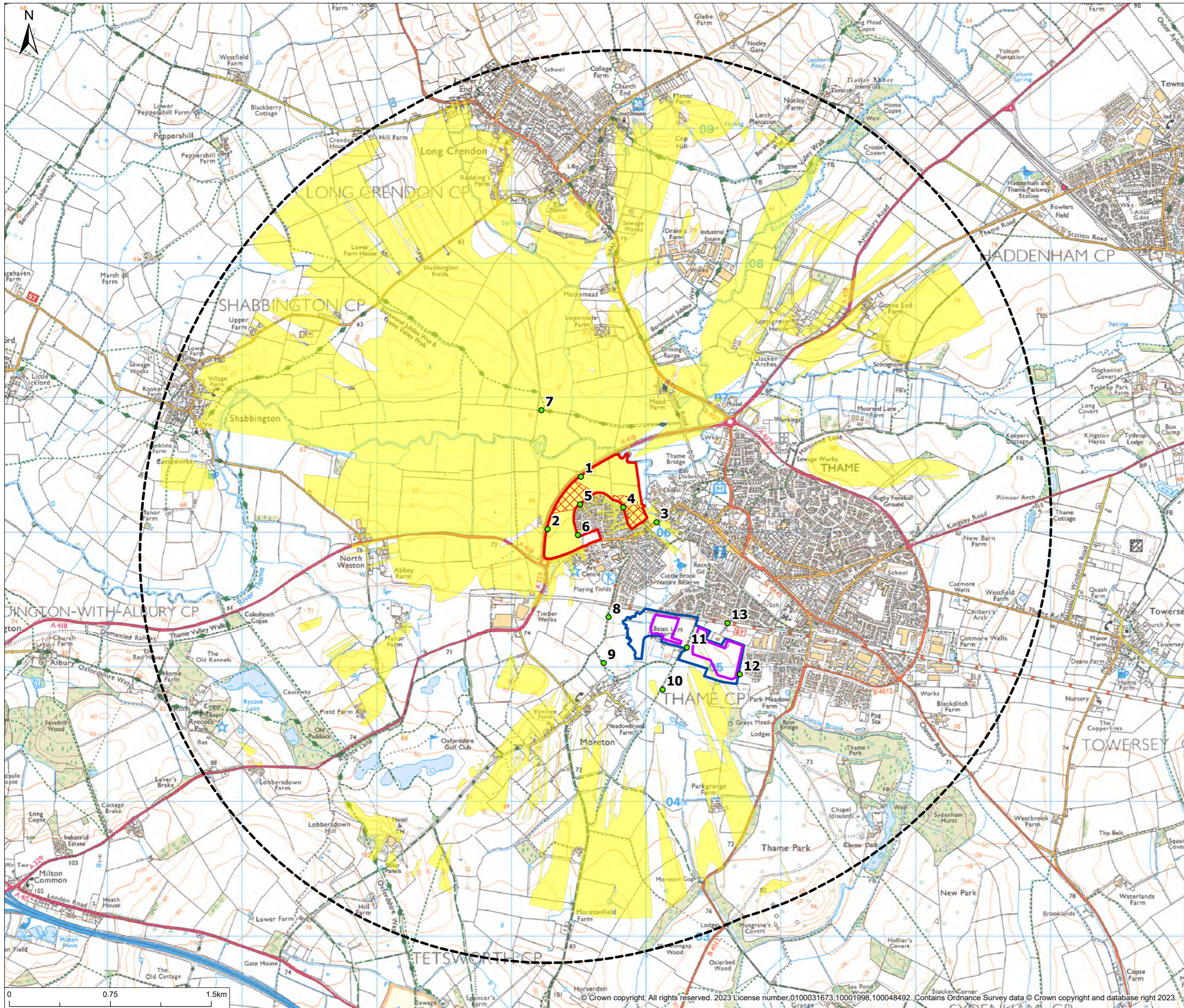
Status **FINAL** Drawn By **JM** PM/Checked By **RA**

Project Number **JSL4910** Scale @ A3 **1:27,000** Date Created **AUG 2023**

Figure Number **1** Rev **-**

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- Legend**
- Oxford Road Site Boundary
 - East and West Sites
 - 3 km Buffer
 - CALA Site Boundary
 - Development Areas
 - Zone of Theoretical Visibility
 - Viewpoints

Data source	OS Terrain 5
Date sourced	2023
Coverage	Within 3km of the East and West site areas
Original cell size	5m
Ground cover is modelled using indicative heights of 9m for buildings, and 12m for woodland blocks. Ground cover is located using OS Open Maps.	ZTV calculated using building heights of 9m
ZTV is not calculated beyond 3km from the site areas	Viewer height is 2m
ZTV calculation does not use mathematically approximate methods	The effects of earth curvature and light refraction are considered

Rev	Description	By	CB	Date

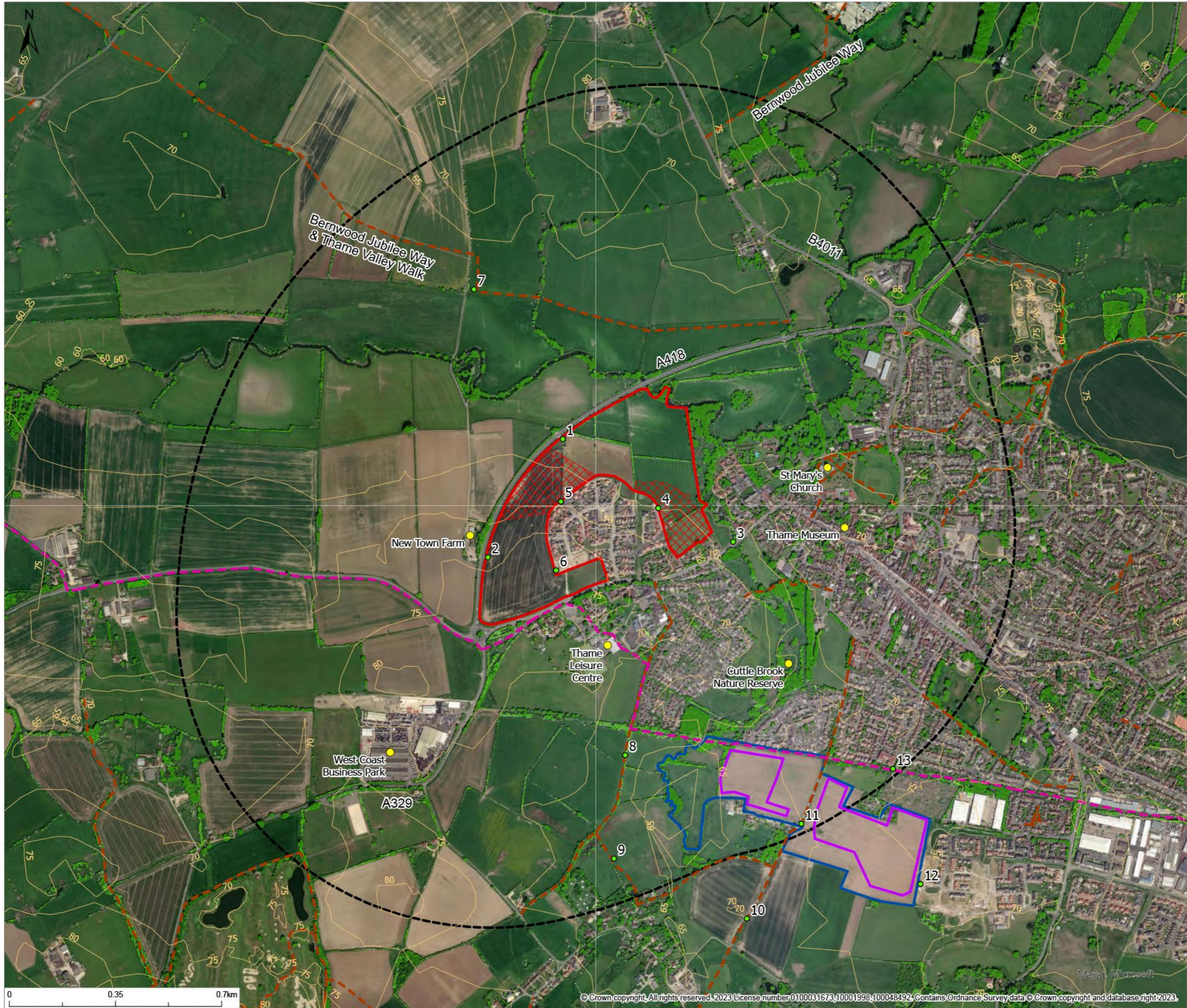
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Client: CALA Homes Limited
 Project: Land at Thame
 Title: Zone of Theoretical Visibility
 Oxford Road East and West Sites

Status: FINAL
 Drawn By: JM
 PM/Checked By: RA
 Project Number: JSL4910
 Scale @ A3: 1:27,000
 Date Created: AUG 2023
 Figure Number: 2
 Rev: -

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- Legend**
- Oxford Road Site Boundary
 - East and West Sites
 - CALA Site Boundary
 - Development Areas
 - National Cycle Network
 - Public Right of Way
- Vegetation (Height)**
- < 0.5 m (not shown)
 - 0.5 - 1 m
 - >1 - 5 m
 - >5 m
- Contours
 - Landscape Features
 - Viewpoints

Rev	Description	By	CB	Date



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 Project **Land at Thame**
 Title **Landscape Analysis Plan**

Status	Drawn By	PM/Checked By
FINAL	JM	RA
Project Number	Scale @ A3	Date Created
JSL4910	1:12,000	AUG 2023
Figure Number		Rev
3		-

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APPENDICES

Appendix A

L VIA Methodology

A.1 Assessment Criteria and Assignment of Significance

Relevant Guidance

A.1.1 As a matter of best practice, this Landscape and Visual Impact Assessment (LVIA) has been undertaken based on the relevant guidance on landscape and visual impact assessment (LVIA) described in the following documents:

- *Landscape Character Assessment: Guidance for England and Scotland* (The Countryside Agency and Scottish Natural Heritage, 2002);
- *Guidelines for Landscape and Visual Impact Assessment, Third Edition* (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment, 2013);
- *An Approach to Landscape Character Assessment* (Natural England, 2014);
- *Technical Guidance Note 2/19 Residential Visual Amenity Assessment* (Landscape Institute, 2019); and
- *Technical Guidance Note 02/21: Assessing landscape value outside national designations* (Landscape Institute, May 2021).

Distinction Between Landscape and Visual Effects

A.1.2 As set out in the GLVIA3, paragraph 2.21, landscape and visual effects are assessed separately, although the procedure for assessing each is closely linked. A clear distinction has been drawn between landscape and visual effects as described below:

- Landscape effects relate to the effects of the proposed development on the physical and other characteristics of the landscape and its resulting character and quality.
- Visual effects relate to the effects on views experienced by visual receptors (e.g. footpath users, road users, people in their places of work etc) and on the change in views experienced by people.

Assessment Criteria and Assignment of Significance of Effects

A.1.3 GLVIA3 sets out broad guidelines rather than detailed prescriptive methodologies. The methodologies tailored for the assessment of this development is based on GLVIA3 guidance, which recommends that an assessment “*concentrates on principles and process*” and “*does not provide a detailed or formulaic recipe*” to assess effects, it being the “*responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand*” (preface to GLVIA3). The effects on the landscape resources or visual receptors (people) are assessed by considering the proposed change in the baseline conditions (the impact of the proposal) against the type of landscape resource or visual receptor (including the importance and sensitivity of that resource or receptor). The methodology is set out in detail below and summarised in Diagram 1. These factors are determined through a combination of quantitative (objective) and qualitative (subjective) assessment using professional judgement.

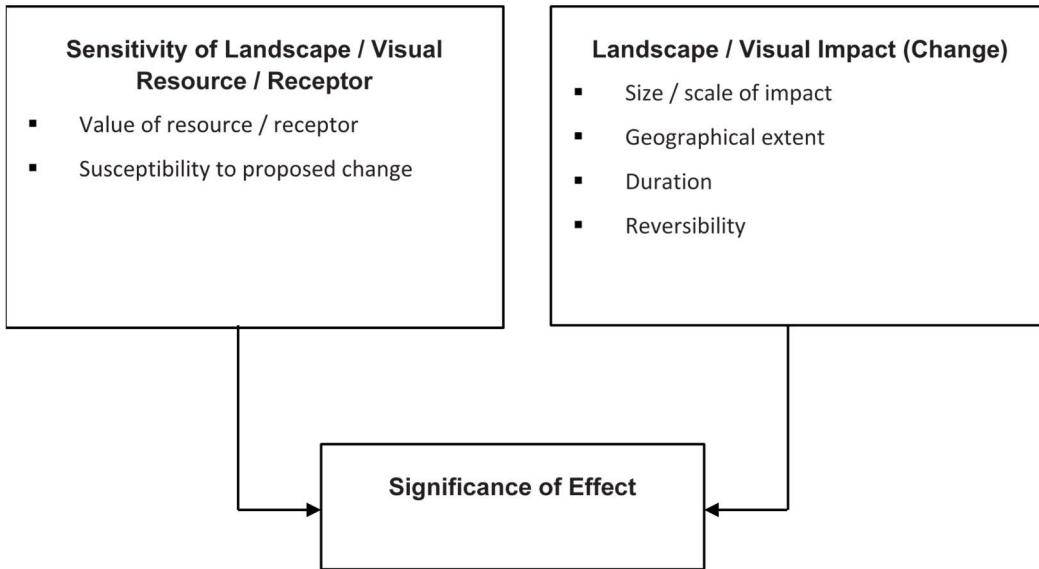


Diagram 1: Assessment Methodology Summary

Sensitivity

Sensitivity of landscape receptors

- A.1.4 The sensitivity of a landscape receptor is a combination of “*judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape*” (GLVIA, para 5.39). For the purpose of this assessment, susceptibility and value of landscape receptors are defined as follows:
- Landscape susceptibility: “*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed change without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies*” (GLVIA, para 5.40).
 - Value of the landscape receptor: “*The value of the Landscape Character Types or Areas that may be affected, based on review of designations at both national and local levels, and, where there are no designations, judgements based on criteria that can be used to establish landscape value; and, the value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particularly landscape features, notable aesthetic, perceptual or experiential qualities, and combinations of these contributors*” (GLVIA, para 5.44).
- A.1.5 Sensitivity is not readily graded into bands. However, descriptions of landscape susceptibility and value are set out in Table 1 below.

Table 1: Definitions of Landscape Sensitivity

Sensitivity	Typical Descriptors	
	Landscape Resource/Receptor Susceptibility	Landscape Resource/Receptor Value
Very High	Exceptional landscape quality, no or limited potential for substitution. Key elements / features well known to the wider public.	Nationally/internationally designated/valued landscape, or key elements or features of nationally/internationally designated landscapes.
High	Strong/distinctive landscape character; absence of landscape detractors.	Regionally/nationally designated/valued countryside and landscape features.
Medium	Some distinctive landscape characteristics; few landscape detractors.	Locally/regionally designated/valued countryside and landscape features.
Low	Absence of distinctive landscape characteristics; presence of landscape detractors.	Undesignated countryside and landscape features.
Negligible	Absence of positive landscape characteristics. Significant presence of landscape detractors.	Undesignated countryside and landscape features.

Sensitivity of visual receptors

A.1.6 Visual receptors are always people. The sensitivity of each visual receptor (the particular person or group of people likely to be affected at a specific viewpoint) *“should be assessed in terms of both their susceptibility to change and in views and visual amenity and also the value attached to particular views”* (GLVIA, para 6.31). For the purpose of this assessment, susceptibility and value of visual receptors are defined as follows:

- Visual susceptibility: *“The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of: The occupation or activity of people experiencing views at the particular locations; and, the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations”* (GLVIA, para 6.32).
- Value of views: Judgements made about the value of views should take account of: *“recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations; and, indicators of value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment (such as parking places, sign boards or interpretive material) and references to them in literature or art...”* (GLVIA, para 6.37).

A.1.7 Sensitivity is not readily graded in bands and GLVIA notes, with regards to visual sensitivity, that the division of who may or may not be sensitive to a particular change *“is not black and white and in reality, there will be a gradation in susceptibility to change”* (GLVIA, para 6.35). In order to provide both consistency and transparency to the assessment process, however, Table 2, below defines the criteria which have guided the judgement as to the intrinsic susceptibility and value of the resource/receptor and subsequent sensitivity to the proposed development.

Table 2: Definitions of Visual Sensitivity

Sensitivity	Typical Descriptors	
	Visual Receptor Susceptibility	Value of View
Very High	Observers, drawn to a particular view, including those who have travelled from around Britain and overseas to experience the views.	See paragraph 1.6 and 1.7, above
High	Observers on the public rights of way network in the countryside are more sensitive to visual change.	See paragraph 1.6 and 1.7, above

Sensitivity	Typical Descriptors	
	Visual Receptor Susceptibility	Value of View
Medium	Observers enjoying the countryside from vehicles on quiet/promoted routes or pedestrians on less scenic/urban rights of way are moderately sensitive to visual change.	See paragraph 1.6 and 1.7, above
Low	Observers in vehicles or people involved in outdoor activities where attention is not focused on landscape are less sensitive to visual change.	See paragraph 1.6 and 1.7, above
Negligible	Observers in vehicles or people involved in frequent or frequently repeated activities are less sensitive to visual change.	See paragraph 1.6 and 1.7, above

Magnitude of Impact

Magnitude of impact on landscape resources and receptors

- A.1.8 The magnitude of impact or change affecting landscape receptors depends on the size or scale, geographical extent of the area influenced and its duration and reversibility. These factors are described below:
- Size or scale: *“The extent of the existing landscape elements that will be lost, the proportion of the total extent that this represents and the contribution of that element to the character of the landscape...; the degree to which aesthetic or perceptual aspects of the landscape are altered either by removal of existing components of the landscape or by addition of new ones...”* and, *“whether the effect [impact] changes the key characteristics of the landscape, which are critical to its distinctive character”* (GLVIA, para 5.49).
 - Geographical extent: Distinct from scale or size, this factor considers the geographical area over which the landscape impacts will be felt, it might, for example, be a moderate loss of landscape receptors or character over a large area, or a large loss of receptors or character over a very localised area. At para 5.50 GLVIA3 notes that *“in general effects [impacts] may have an influence at the following scales, although this will vary according to the nature of the project and not all may be relevant on every occasion: at the site level within the development site itself; at the level of the immediate setting of the site; at the scale of the landscape type or character area within which the proposal lies; and, on a larger scale, influencing several landscape types or character areas.”* For the purposes of this LVIA, the assessment considers the impact of the proposed development on the published landscape character areas, both at local and national level, i.e. the third and fourth landscape scales.
- A.1.9 Duration and reversibility: Duration is categorised as short, medium or long-term. GLVIA explains that as there are no standard lengths of time within these categories, the appraisal must state what these are and why these have been chosen (GLVIA, para 5.51). Reversibility is described as *“a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation”* (GLVIA, para 5.52). Projects can be considered to be permanent (irreversible), partly reversible or fully reversible. For the purposes of this assessment the proposed development is considered to be fully reversible.

Magnitude of impact on visual receptors

- A.1.10 As with the magnitude of landscape impacts, the magnitude of impact or change affecting visual receptors depends on the size or scale, geographical extent of the area influenced and its duration and reversibility. These factors are described below:
- Size or scale: Judgements need to take account of: *“the scale of the change [impact] in the view with respect to the loss or addition of features in the view and changes in its*

composition, including the proportion of the view occupied by the proposed development; the degree of contrast or integration of any new features or changes in the landscape with existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture; and, the nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpses” (GLVIA, para 6.39).

- Geographical extent: This will vary from viewpoint to viewpoint and will reflect: “the angle [orientation] of view in relation to the main activity of the receptor; the distance of the viewpoint from the proposed development; and, the extent of the area over which the changes [impacts] would be visible” (GLVIA, para 6.40).

A.1.11 Duration and reversibility of visual effects: As with landscape impacts, duration should be categorised as short, medium or long-term and projects considered to be permanent (irreversible), partially reversible or fully reversible (GLVIA, para 6.41). For the purposes of this assessment the impacts on views of the proposed development are considered to be fully reversible.

A.1.12 The magnitude of the predicted impact has been described using criteria outlined above and Diagram 1 and detailed in methodology below. Magnitude of impact has been classified on a four-point scale (Large, Medium, Small and Negligible). The definitions of terms relating to the magnitude of impact are set out in Table 3, below.

Table 3: Example Definitions of Magnitude of Impact

Magnitude of Impact	Typical Descriptors	
	Landscape Resource	Visual Resource
Large	Total loss or addition or/very substantial loss or addition of key elements/features/patterns of the baseline i.e., pre-development landscape and/or introduction of dominant, uncharacteristic elements with the attributes of the receiving landscape.	Complete or very substantial change in view, dominant involving complete or very substantial obstruction of existing view or complete change in character and composition of baseline, e.g., through removal of key elements.
Medium	Partial loss or addition of or moderate alteration to one or more key elements/features/patterns of the baseline i.e., pre-development landscape and/or introduction of elements that may be prominent but may not necessarily be substantially uncharacteristic with the attributes of the receiving landscape.	Moderate change in view: which may involve partial obstruction of existing view or partial change in character and composition of baseline, i.e. pre-development view, through the introduction of new elements or removal of existing elements. Change may be prominent but would not substantially alter scale and character of the surroundings and the wider setting. Composition of the views would alter. View character may be partially changed through the introduction of features which, though uncharacteristic, may not necessarily be visually discordant.
Small	Minor loss or addition of or alteration to one or more key elements/features/patterns of the baseline i.e., pre-development landscape and/or introduction of elements that may not be uncharacteristic with the surrounding landscape.	Minor change in baseline, i.e. pre-development view, – change would be distinguishable from the surroundings whilst composition and character would be similar to the pre-change circumstances.
Negligible	Very minor loss or addition of or alteration to one or more key elements/features/patterns of the baseline i.e., pre-development landscape and/or introduction of elements that are not uncharacteristic with the surrounding landscape approximating to a ‘no-change’ situation.	Very slight change in baseline, i.e. pre-development view, – change barely distinguishable from the surroundings. Composition and character of view substantially unaltered.

Significance of effects

- A.1.13 It is recognised that new development will lead to some landscape and visual effects. However, it should be stressed that not all landscape and visual effects arising will be significant.
- A.1.14 GLVIA3 explains, at paragraph 5.55, that a staged approach can be adopted when assessing landscape significance *“susceptibility to change and value can be combined into an assessment of sensitivity for each receptor, and size/scale, geographical extent and duration and reversibility can be combined into an assessment of magnitude for each effect. Magnitude and sensitivity can then be combined to assess overall significance.”*
- A.1.15 Within this assessment, the assessment of significance has taken the following into account (as appropriate):
- reference to regulations or standards;
 - reference to best practice guidance;
 - reference to policy objectives;
 - reference to criteria, for example designations or protection status;
 - outcomes of consultation to date; and
 - professional judgement based on local / regional / specialist experience.
- A.1.16 Significance varies depending on the receptor's sensitivity and the magnitude of impact of the project. The distance to the development can be a major factor in determining the magnitude of the impact. Those resources or receptors closer to the project are likely to experience a greater significance of effects than those further away.
- A.1.17 A significant effect would not necessarily mean that the effect is unacceptable in planning terms. What is important is that the likely effects of any proposal are transparently assessed and understood in order that the determining authority can bring a balanced and well-informed judgement to bear when making any decision. This judgement should be based upon weighing up the benefits of the proposal against the anticipated effects, both positive and negative.
- A.1.18 The matrix, at Table 4, has been used to guide the assessment of effects. Where the matrix provides a choice of level of effects, e.g., Minor to Moderate, the assessor has exercised professional judgement in determining which of the levels is more appropriate.

Table 4: Assessment of Significance of Effects Matrix

Sensitivity	Magnitude of Impact			
	Negligible	Small	Medium	Large
Negligible	Negligible	Negligible to Minor	Negligible to Minor	Minor
Low	Negligible to Minor	Negligible to Minor	Minor	Minor to Moderate
Medium	Negligible to Minor	Minor	Moderate	Moderate to Major
High	Minor	Minor to Moderate	Moderate to Major	Major to Substantial
Very high	Minor	Moderate to Major	Major to Substantial	Substantial

- A.1.19 The significance of effect on landscape, views and visual amenity has been described according to the five-point scale shown in the above matrix (Substantial, Major, Medium, Minor, Negligible or Neutral). A description of these terms is provided in Table 5, below.

Table 5: Definitions of Significance Criteria

Magnitude	Typical Descriptors	
	Landscape Resource	Visual Resource
Substantial	Where proposed changes would be uncharacteristic and/or would significantly alter a landscape of exceptional landscape quality (e.g., internationally designated landscapes), or	Where proposed changes would be uncharacteristic and/or would significantly alter a view of remarkable scenic quality, within internationally designated landscapes

key elements known to the wider public of nationally designated landscapes (where there is no or limited potential for substitution nationally).

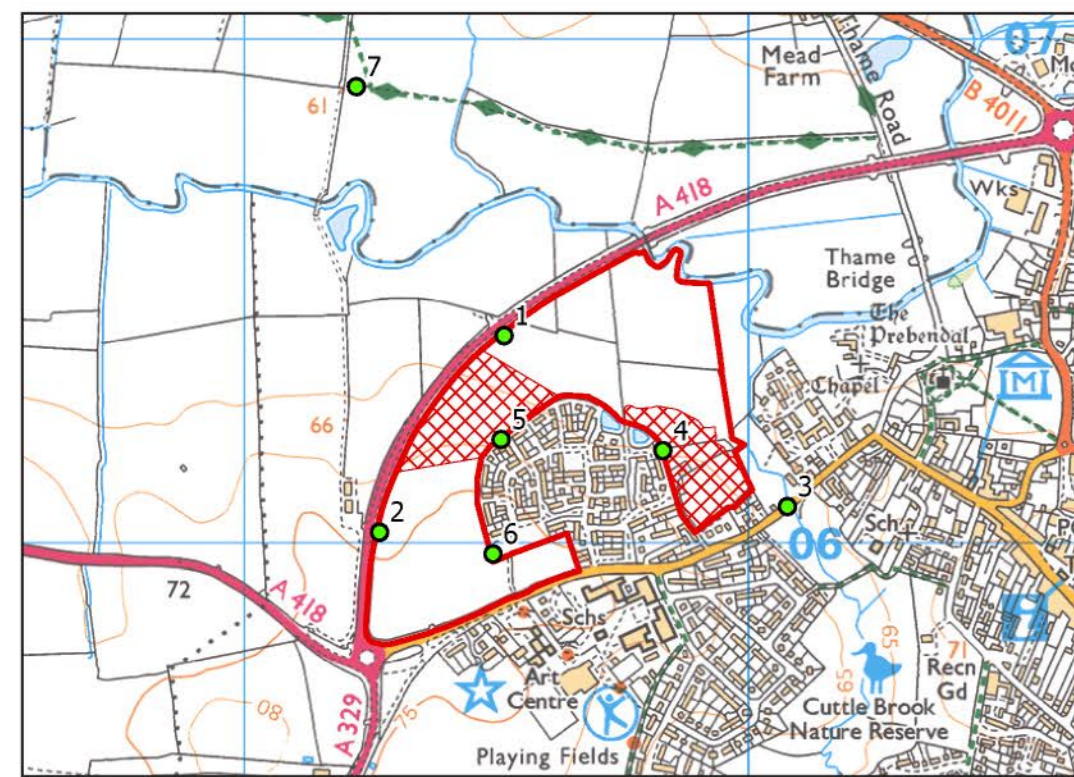
or key features or elements of nationally designated landscapes that are well known to the wider public.

Major	Where proposed changes would be uncharacteristic and/or would significantly alter a valued aspect of (or a high quality) landscape.	Where proposed changes would be uncharacteristic and/or would significantly alter a valued view or a view of high scenic quality.
Moderate	Where proposed changes would be noticeably out of scale or at odds with the character of an area.	Where proposed changes to views would be noticeably out of scale or at odds with the existing view.
Minor	Where proposed changes would be at slight variance with the character of an area.	Where proposed changes to views, although discernible, would only be at slight variance with the existing view.
Negligible	Where proposed changes would have an indiscernible effect on the character of an area.	Where proposed changes would have a barely noticeable effect on views/visual amenity.
Neutral	Where there is a balance of proposed changes, both negative and positive, which leave the character of an area effectively unaltered.	Where there is a balance of proposed changes, both negative and positive, which leave the visual amenity of an area effectively unaltered.

A.1.20 In this assessment, those effects of Moderate and below are not considered to be significant. Those effects to be Major and above are considered to be significant.

Appendix B

Viewpoint Photosheets



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← Extents of Oxford Road East Site

Extents of Oxford Road West Site →

Thame Meadows Development



4910-05

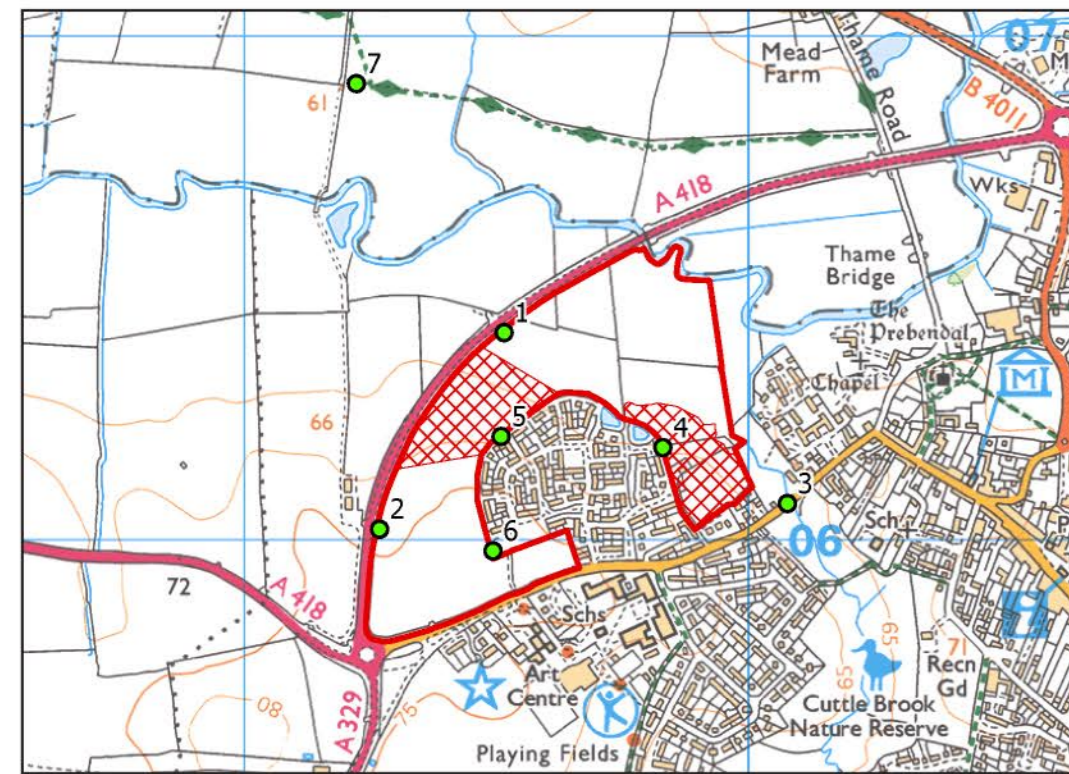


Viewpoint 1: A418 Northwest of Oxford Road Site

Land at Thame
JSL4910

Date of photograph: 21/07/2023
OS Grid Ref: 469514, 206413

Horizontal field of view: approx. 90°
To be viewed at comfortable arms length



Extents of Oxford Road West Site

Extents of Oxford Road East Site (not visible)

Thame Meadows Development



4910-05

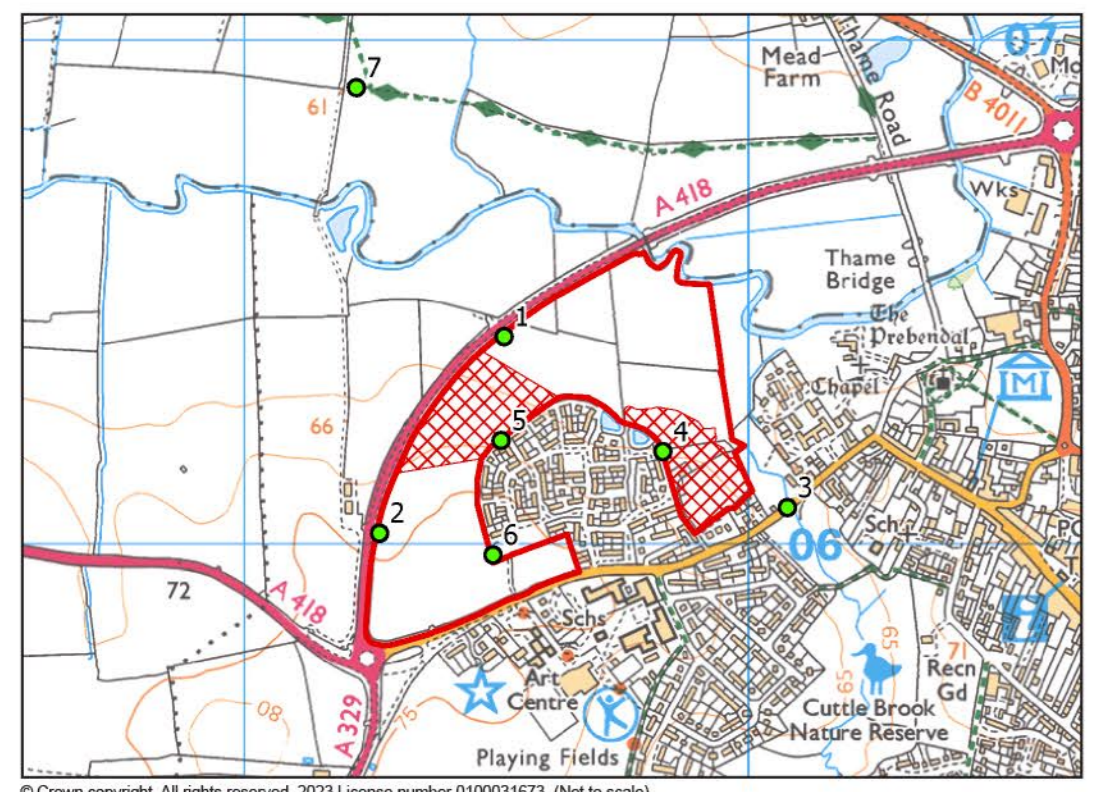


Viewpoint 2: A418 West of Oxford Road Site

Land at Thame
JSL4910

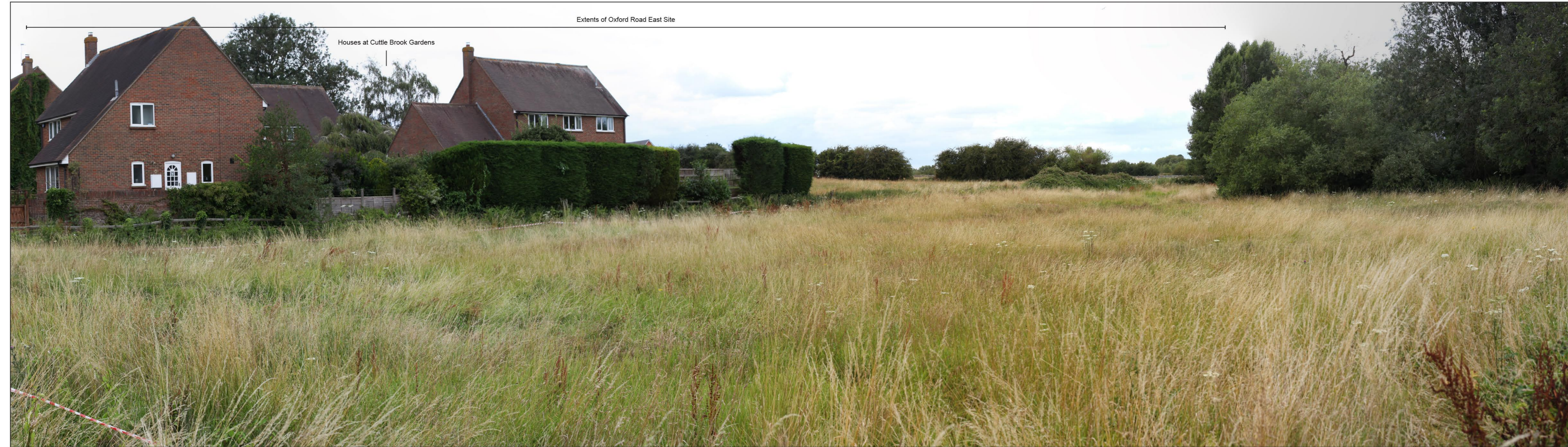
Date of photograph: 21/07/2023
OS Grid Ref: 469267, 206023

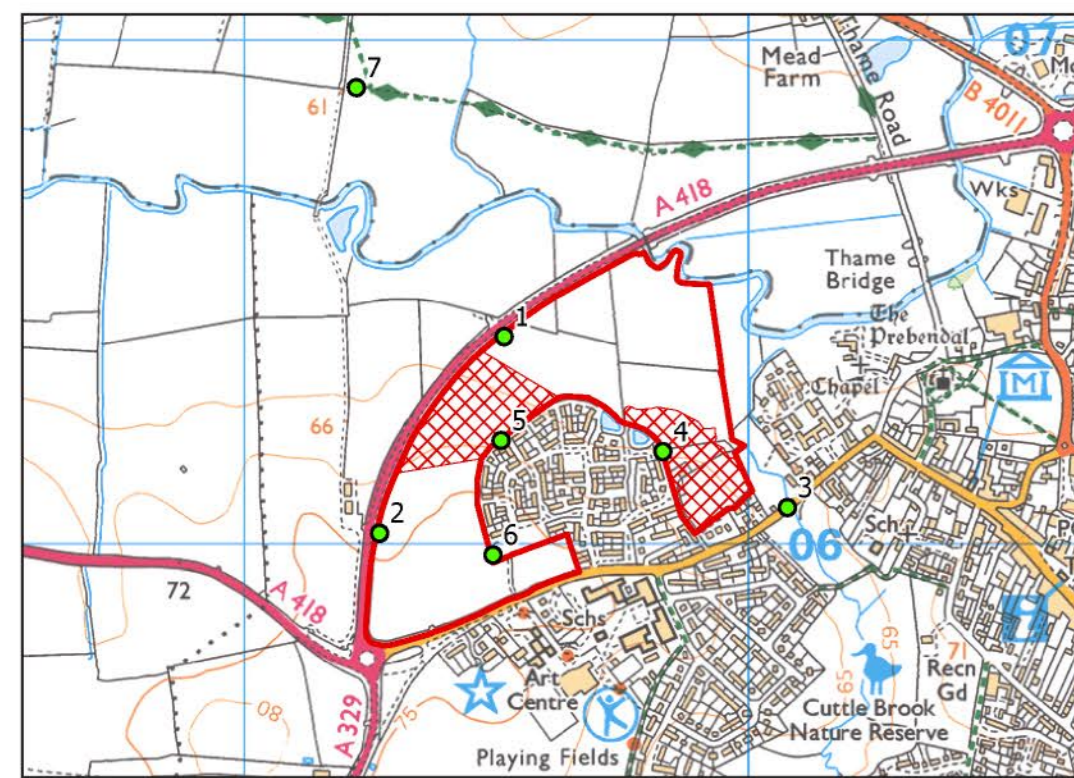
Horizontal field of view: approx. 90°
To be viewed at comfortable arms length

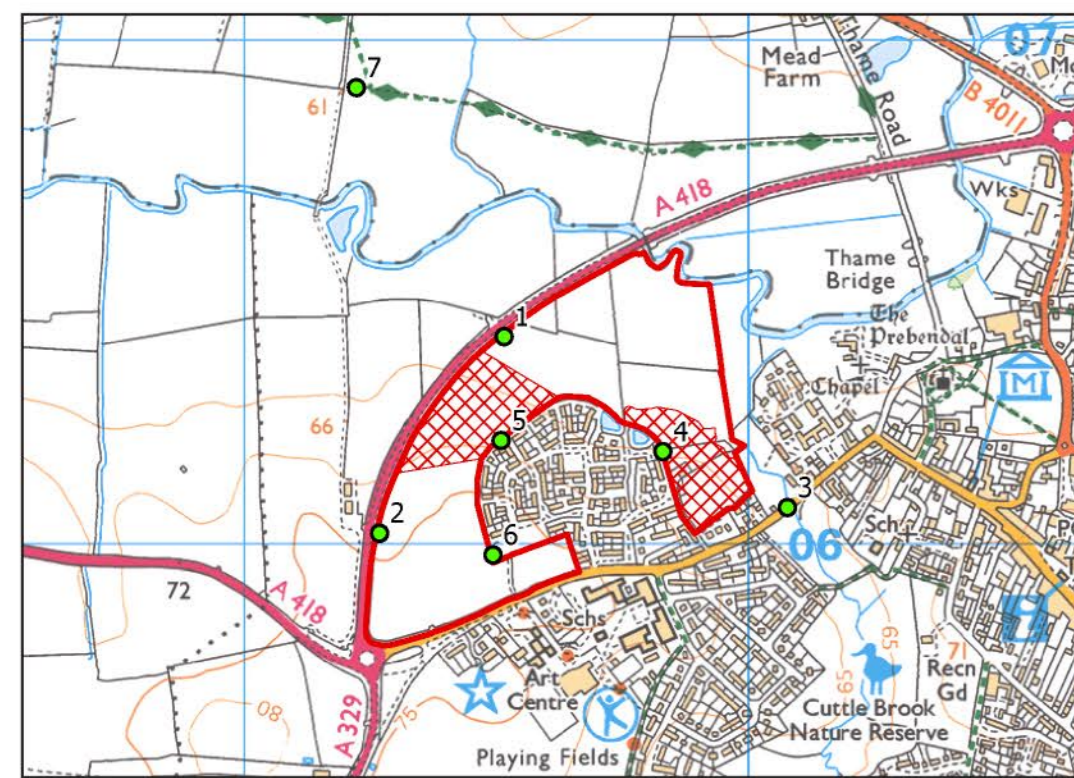


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Houses at Cuttle Brook Gardens







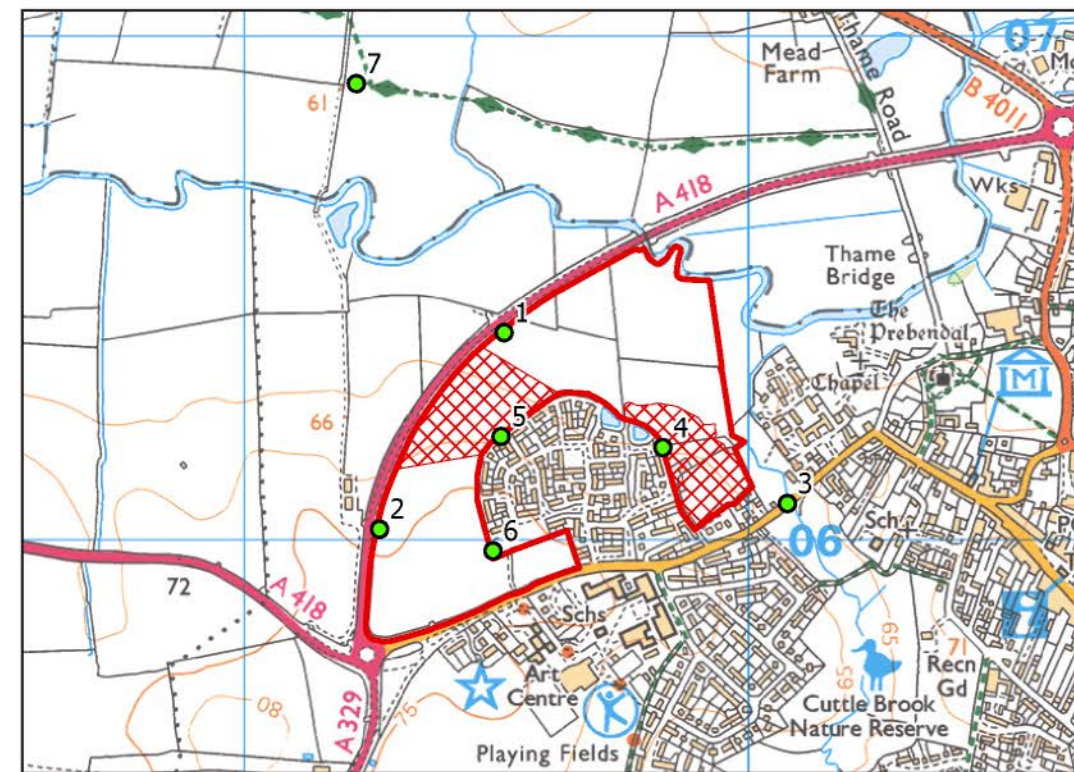
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4910-05

Extents of Oxford Road West Site

Offa Place

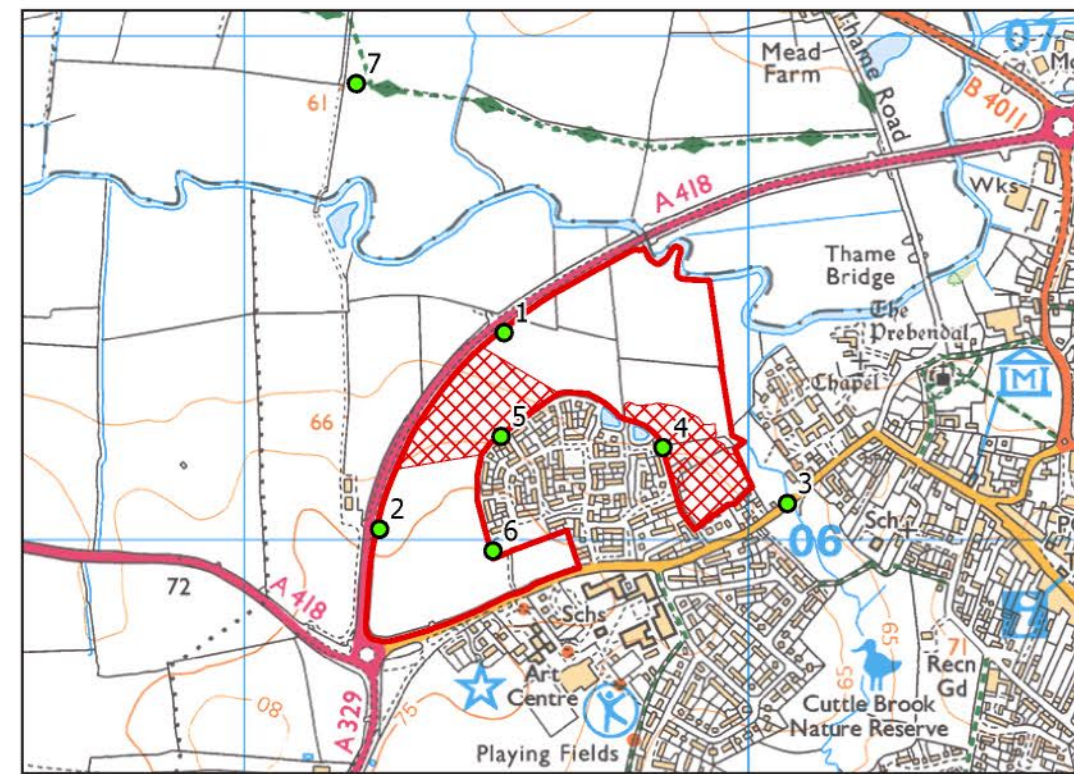
Extents of 120 degree horizontal field of view



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Offa Place



Illustrative Baseline Photos of the CALA Homes Site



Viewpoint 8: View from PRow 383/6/20 to the west of the CALA site looking towards Cuttle Brook LNR. The trees in the middle ground screen the site from view.



Viewpoint 9: View from PRow 383/17/10 to the southwest of the CALA site. A small proportion of the CALA site is visible in the centre.



Viewpoint 10: View from PRow 383/18/10 to the south of the CALA site. The ground plain of the eastern part of the CALA site is visible to the right of centre.



Viewpoint 11: View from PRow 383/6/60 from the central part of the CALA site to the east of Bates Leys Farm. The view looks across the western part of the CALA site with the eastern part screened by a hedge.



Viewpoint 12: View west from Edsell Crescent in the west of the recently completed (2021) Persimmon Homes development



Viewpoint 13: A typical view along NCN route 57 showing screening vegetation in the left of the image in the direction of the CALA site.

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Response 47: ID ANON-MT75-C6HC-H

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 12:56:40

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Director

Organisation (if relevant):

Savills

Organisation representing (if relevant):

JM Castle Trust

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Post code:

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Part B - Your comments

3 Please provide your comments below.

Your Comments:

Representations to the Thame Neighbourhood Plan 2 (TNP2) Regulation 16 (Submission) version consultation on behalf of the JM Castle Trust – July 2024

Savills is instructed by the JM Castle Trust (hereafter the 'Client') to make representations on the recently published Regulation 16 version of the Thame Neighbourhood Plan Revision.

Our Client owns land formally known as Site G, but now known as "Rycote Lane" to the west of Thame and previously written in August 2021, January 2022 and July 2023 in response to the earlier consultations on the Neighbourhood Plan Revision.

These representations promoted the allocation of this site for employment and resulted in the proposed allocation in the TNP2. We have read the consultation documents, including the Basic Conditions Statement and have the following comments to make.

In summary our Clients:

- Congratulate Thame Town Council (TTC) on production of the TNP2 document and recognise the amount of work that has gone in to get to this stage.
- Support the allocation of land at Rycote Lane for employment development and note that it received 64.4% of the votes in support at the consultation by TTC (see Consultation Statement Feb 2024, Volume 3a, paragraph 2.2).

Strategic Policies in the Development Plan

The strategic policies of relevance are set out in the South Oxfordshire Local Plan 2035, adopted in December 2020. The strategic policies note the following in relation to Thame:

- STRAT1: Overall Strategy – “supports the role of Thame.... by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure”. The text recognises the sustainable nature of Thame as a location for development; [Emphasis added]
- STRAT2: South Oxfordshire Housing and Employment Requirements which confirms a minimum requirement of 39.1 hectares of new employment land in accordance with STRAT 1.

In addition, the following policy is of relevance:

- TH1 – Strategy for Thame – sets out a number of criteria that the TNP2 is expected to comply with including to provide new employment opportunities and improve the stock of existing employment areas; [Emphasis added]
The Rycote Lane allocation

Our Client fully supports the allocation of the Rycote Lane site (Policy GDE1) for employment uses in Use Classes B2- B8 and E(g) (i – iii). It is noted that the red-line boundary of the allocation is different from the site our Client has previously promoted, but this does not cause any issues around land ownership or deliverability. This site is available and deliverable. Our Client's landholding at Rycote Lane is larger than the extent of the allocation and the remainder is available for employment uses should it be required.

Our Client is committed to engaging fully with the market as soon as possible so this allocation is delivered to provide the Council confidence that the town will meet its employment floorspace requirements early in the Plan period. These requirements were established by Policy EMP1 of the South Oxfordshire Local Plan 2035.

Savills has been marketing the existing employment site to the south of this site which is now completely built out with the majority of units let and occupied. There has been exceptionally strong demand from a range of interested parties covering the available B1, B2 and B8 uses.

Our view remains that Rycote Lane would be equally, if not more attractive (due to its better prominence), than that site and as such would have no issues with take up. The flexible nature of the allocation will be attractive to the market and cater for this existing demand.

In addition, interest for an hotel on the site has previously been received. The Town Council previously inquired about expanding the permitted uses to include an hotel, but we note this has not been taken forward into the draft plan.

The Masterplanning Reports identifies this site has, “good access to the strategic road network, such as the M40, being located at the junction of the A418 (Thame Rd) and Rycote Lane. It is also well served by bus services (Sapphire 280 service by Arriva which links to Thame Oxford and Aylesbury) and cycle routes, being close to the Phoenix Trail.”

The Masterplanning Report continues, “The site is directly adjacent to existing employment (Menlo Industrial Park which incorporates ASM and the former Gregory Distribution Land) and therefore is a logical location for further employment. It is also set back from the main residential area in Thame, reducing any potential impacts on existing residents.” Our clients fully endorse this conclusion.

Clause 2 of Policy GDE1 outlines six criteria that the development of the Rycote Lane site is expected to meet. Our Client's response to this is summarised in the below table:

Provision of a single point of vehicular access from the A329 (Rycote Lane), subject to further testing through the application process and to the satisfaction of Oxfordshire County Council - Agreed – The existing field access onto the Rycote Lane can be upgraded as necessary to provide a safe vehicular access. Previous discussions with the Highway Authority raised no issues with providing an access. Parking and servicing areas are to be provided to the side and rear of employment units. This criterion appears based on the Concept Masterplan included in the Masterplan Report which shows two large units facing Rycote Lane.

However, there are many ways the layout of this site could be designed, and this is likely to be driven by the market interest received. Whilst the servicing of the units would likely always be to the rear, some users may prefer parking to be at the front of the unit for the convenience of staff and visitors.

A flexible approach that judges each proposal on its own merits is needed.

The siting of buildings should respond to the contours of the site and be located at lower points and set back from site boundaries to minimise visibility of development from publicly accessible routes and spaces: Agreed – The layout of any proposal will be informed by a landscape appraisal that will be undertaken as part of the normal suite of surveys and technical reports needed to support a major planning application.

Initial landscape appraisal work undertaken by Our Client has been previously provided to the Town Council that showed a concept of how new planting could help assimilate the development into the rural surroundings.

Where buildings are sited along the A329, they should be arranged with windows and entrances fronting onto the road - Agreed – This is standard practice to ensure active frontages to the public realm and natural surveillance.

Landscaping, including new and retained tree planting, shall be provided alongside site boundaries, providing a soft edge to the development. Existing hedgerows and tree cover should be supplemented with additional woodland planting, making use of native species, and taking opportunities to reconnect severed hedgerows and tree lines where possible. The scale and location of buildings on site and provision of new screen belt planting should help ensure a sensitive transition between the area of development and open landscape to the north and west of the site: Agreed – again this is consistent with the initial landscape appraisal work.

New native planting can also be used to provide biodiversity net gain.

Provision of safe crossing points on Rycote Lane for pedestrian and cyclists which integrate into the wider network of existing pedestrian and cycle routes in Thame: Agreed – This can be provided to connect to the Phoenix Trail and pedestrian/cycle links along Oxford Road.

The Concept Plan

Our Client welcomes the fact that the Concept Plan provided in the Masterplanning report for the Rycote Lane is not replicated in the main body of the Neighbourhood Plan itself, unlike the housing allocations. There is variety of ways this site could be developed. given the flexibility between the allocated uses, so it is appropriate that the Plan does not limit itself to any one particular approach. The Concept Plan should only be used to illustrate some of the design principles required by the policy can be accomplished.

It is clear that there is a balance to be found at the masterplanning stage between using new planting to visually contain the new buildings at key vantage points without eroding the fundamentally open landscape that surrounds Thame. The concept plan must be treated as illustrative in all regards.

Nonetheless, this development will be located at the entrance to Thame and will need to have a street presence and provide “gateway” buildings.

The proposed mitigation screen belt planting measures are sensibly located the need to provide a, “...generous open space buffer along the north and western site boundaries should be provided, due to the sensitivity of this site within the landscape setting” is sensible and supported.

It is important that these mitigation measures are not adhered so strictly as to frustrate development. A flexible approach to the delivery of the TNP2 allocations will be needed.

The Masterplanning Report recommends, “Seven new employment units are proposed - ranging from 7,500-25,000sq ft - providing a total of c.112,500 sqft of new employment space (based on single storey development.”

It is likely that any development of this site will be guided by market demand and the needs of prospective tenants. Clearly there will be a variety of ways to approach the provision of this substantial amount of employment space so the Town Council will need to be flexible when assessing future proposals. It will be important to focus on the design principles discussed above rather than the Concept Plan supporting Policy GDE1

As per the Regulation 14 version of the Neighbourhood Plan Review, the Concept Plan indicatively shows a drainage pond immediately northwest of the proposed developed area. This is not the low point of the site it is likely that any attenuation features will be located in northeastern part of the site. It is disappointing that this error has not been corrected and only serves to highlight the importance of the Concept Plan not being treated as the only way to develop a site.

Suggested Action

1. Remove drainage pond from Concept Plan.

It is for a later planning application stage to establish, in consultation with Council officers and local stakeholders, how best to bring a site forward, using a more detailed evidence base than that which has informed the Masterplanning Report. Nonetheless, it is clear that making the blue links and green links work together will be a key element of future masterplanning work.

The Concept Plan does provide ample opportunities for providing Biodiversity Net Gain (BNG). Our Clients are confident that appropriate levels of BNG can be provided on site as part of any application to meet national and local policy (TNP2 Policy NEB1).

The remainder of the Plan

Rycote Lane lies outside the specified Character Areas of Thame included in the Neighbourhood Plan. Given the scale of this “eastern employment area” our Client considers the Plans’ Character Area analysis is extended to include the existing and proposed development in this part of the Neighbourhood Plan Area.

Suggested Action

1. Include the existing and proposed employment areas along Rycote Lane as a Character Area assessed in TNP2 to establish a baseline to assist the preparation and assessment of future development proposals

Our Client is committed to enabling the delivery of a high-quality development which responds positively to the setting and character of the area within which it is located as required by Policy CPQ1. The design criteria in Policy CPQ1 are reasonable. The density of the immediate surroundings to a development site (criterion k) is a useful starting point but local and national requirements to ensure an efficient use of land must also be considered to ensure the policy meets the Basic Conditions.

CPQ5 – Sustainable Design and Construction

Our Client is committed to enabling a highly energy efficient development that will achieve the relevant requirements of Policy CPQ5 in respect of solar gain, renewable energy, water efficiency and EV charging.

However, this policy should align with the policies in the Local Plan. It is important that, in applying this policy, Building Regulation requirements are borne in mind along with the Written Ministerial Statement in relation to duplicating policy requirements. Building Regulations may eventually supersede these policy criteria. As currently drafted it is questioned if it meets the Basic Conditions.

NEB1 – Biodiversity

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Conclusion

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Yours sincerely


Director

You can upload supporting evidence here:
L 240725 RL - TNP2 submission consultation response - final.pdf was uploaded

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The remainder of the Plan

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No file uploaded

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[REDACTED]

Public hearing

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Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

To be able to discuss our proposed changes to the Plan with the appointed Inspector

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

25 July 2024
L 240725 RL - TNP2 submission consultation response - final



Planning Policy
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135 Eastern Avenue
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Oxford OX2 0QL
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F: +44 (0) 1865 269 001
savills.com

Correspondence by email only to:

planning.policy@southandvale.gov.uk

Dear Sirs,

Representations to the Thame Neighbourhood Plan 2 (TNP2) Regulation 16 (Submission) version consultation on behalf of the JM Castle Trust – July 2024

Savills is instructed by the JM Castle Trust (hereafter the 'Client') to make representations on the recently published Regulation 16 version of the Thame Neighbourhood Plan Revision.

Our Client owns land formally known as Site G, but now known as "Rycote Lane" to the west of Thame and previously written in August 2021, January 2022 and July 2023 in response to the earlier consultations on the Neighbourhood Plan Revision.

These representations promoted the allocation of this site for employment and resulted in the proposed allocation in the TNP2. We have read the consultation documents, including the Basic Conditions Statement and have the following comments to make.

In summary our Clients:

- Congratulate Thame Town Council (TTC) on production of the TNP2 document and recognise the amount of work that has gone in to get to this stage.
- Support the allocation of land at Rycote Lane for employment development and note that it received 64.4% of the votes in support at the consultation by TTC (see Consultation Statement Feb 2024, Volume 3a, paragraph 2.2).

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The strategic policies of relevance are set out in the South Oxfordshire Local Plan 2035, adopted in December 2020. The strategic policies note the following in relation to Thame:

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- STRAT2: South Oxfordshire Housing and Employment Requirements which confirms a minimum requirement of 39.1 hectares of new employment land in accordance with STRAT 1.

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The Rycote Lane allocation

Our Client fully supports the allocation of the Rycote Lane site (Policy GDE1) for employment uses in Use Classes B2- B8 and E(g) (i – iii). It is noted that the red-line boundary of the allocation is different from the site our Client has previously promoted, but this does not cause any issues around land ownership or deliverability. This site is available and deliverable. Our Client’s landholding at Rycote Lane is larger than the extent of the allocation and the remainder is available for employment uses should it be required.

Our Client is committed to engaging fully with the market as soon as possible so this allocation is delivered to provide the Council confidence that the town will meet its employment floorspace requirements early in the Plan period. These requirements were established by Policy EMP1 of the South Oxfordshire Local Plan 2035.

Savills has been marketing the existing employment site to the south of this site which is now completely built out with the majority of units let and occupied. There has been exceptionally strong demand from a range of interested parties covering the available B1, B2 and B8 uses.

Our view remains that Rycote Lane would be equally, if not more attractive (due to its better prominence), than that site and as such would have no issues with take up. The flexible nature of the allocation will be attractive to the market and cater for this existing demand.

In addition, interest for an hotel on the site has previously been received. The Town Council previously inquired about expanding the permitted uses to include an hotel, but we note this has not been taken forward into the draft plan.

The Masterplanning Reports identifies this site has, *“good access to the strategic road network, such as the M40, being located at the junction of the A418 (Thame Rd) and Rycote Lane. It is also well served by bus services (Sapphire 280 service by Arriva which links to Thame Oxford and Aylesbury) and cycle routes, being close to the Phoenix Trail.”*

The Masterplanning Report continues, *“The site is directly adjacent to existing employment (Menlo Industrial Park which incorporates ASM and the former Gregory Distribution Land) and therefore is a logical location for further employment. It is also set back from the main residential area in Thame, reducing any potential impacts on existing residents.”* Our clients fully endorse this conclusion.

Clause 2 of Policy GDE1 outlines six criteria that the development of the Rycote Lane site is expected to meet. Our Client’s response to this is summarised in the below table:

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Provision of a single point of vehicular access from the A329 (Rycote Lane), subject to further testing through the application process and to the satisfaction of Oxfordshire County Council	Agreed – The existing field access onto the Rycote Lane can be upgraded as necessary to provide a safe vehicular access. Previous discussions with the Highway Authority raised no issues with providing an access.
Parking and servicing areas are to be provided to the side and rear of employment units.	This criterion appears based on the Concept Masterplan included in the Masterplan Report which shows two large units facing Rycote Lane. However, there are many ways the layout of this site could be designed, and this is likely to be driven by the market interest received. Whilst the servicing of the units would likely always be to the rear, some users may prefer parking to be at the front of the unit for the convenience of staff and visitors.

	A flexible approach that judges each proposal on its own merits is needed.
The siting of buildings should respond to the contours of the site and be located at lower points and set back from site boundaries to minimise visibility of development from publicly accessible routes and spaces	Agreed – The layout of any proposal will be informed by a landscape appraisal that will be undertaken as part of the normal suite of surveys and technical reports needed to support a major planning application. Initial landscape appraisal work undertaken by Our Client has been previously provided to the Town Council that showed a concept of how new planting could help assimilate the development into the rural surroundings.
Where buildings are sited along the A329, they should be arranged with windows and entrances fronting onto the road.	Agreed – This is standard practice to ensure active frontages to the public realm and natural surveillance.
Landscaping, including new and retained tree planting, shall be provided alongside site boundaries, providing a soft edge to the development. Existing hedgerows and tree cover should be supplemented with additional woodland planting, making use of native species, and taking opportunities to reconnect severed hedgerows and tree lines where possible. The scale and location of buildings on site and provision of new screen belt planting should help ensure a sensitive transition between the area of development and open landscape to the north and west of the site.	Agreed – again this is consistent with the initial landscape appraisal work. New native planting can also be used to provide biodiversity net gain.
Provision of safe crossing points on Rycote Lane for pedestrian and cyclists which integrate into the wider network of existing pedestrian and cycle routes in Thame.	Agreed – This can be provided to connect to the Phoenix Trail and pedestrian/cycle links along Oxford Road.

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Our Client welcomes the fact that the Concept Plan provided in the Masterplanning report for the Rycote Lane is not replicated in the main body of the Neighbourhood Plan itself, unlike the housing allocations. There is variety of ways this site could be developed. given the flexibility between the allocated uses, so it is appropriate that the Plan does not limit itself to any one particular approach. The Concept Plan should only be used to illustrate some of the design principles required by the policy can be accomplished.

It is clear that there is a balance to be found at the masterplanning stage between using new planting to visually contain the new buildings at key vantage points without eroding the fundamentally open landscape that surrounds Thame. The concept plan must be treated as illustrative in all regards.

Nonetheless, this development will be located at the entrance to Thame and will need to have a street presence and provide “gateway” buildings.

The proposed mitigation screen belt planting measures are sensibly located the need to provide a, “...*generous open space buffer along the north and western site boundaries should be provided, due to the sensitivity of this site within the landscape setting*” is sensible and supported.

It is important that these mitigation measures are not adhered so strictly as to frustrate development. A flexible approach to the delivery of the TNP2 allocations will be needed.

The Masterplanning Report recommends, “Seven new employment units are proposed - ranging from 7,500-25,000sq ft - providing a total of c.112,500 sqft of new employment space (based on single storey development.”

It is likely that any development of this site will be guided by market demand and the needs of prospective tenants. Clearly there will be a variety of ways to approach the provision of this substantial amount of employment space so the Town Council will need to be flexible when assessing future proposals. It will be important to focus on the design principles discussed above rather than the Concept Plan supporting Policy GDE1

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Our Client is committed to enabling the delivery of a high-quality development which responds positively to the setting and character of the area within which it is located as required by Policy CPQ1. The design criteria in Policy CPQ1 are reasonable. The density of the immediate surroundings to a development site (criterion k) is a useful starting point but local and national requirements to ensure an efficient use of land must also be considered to ensure the policy meets the Basic Conditions.

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Our Client is committed to enabling a highly energy efficient development that will achieve the relevant requirements of Policy CPQ5 in respect of solar gain, renewable energy, water efficiency and EV charging.

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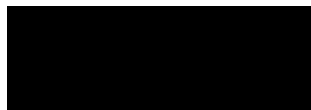
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Yours sincerely



Director

Response 48: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 13:01

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:
[REDACTED]

Job title (if relevant):

Senior Planner

Organisation (if relevant):

Savills

Organisation representing (if relevant):

JM Castle Trust

Address line 1:

Wytham Court

Address line 2:

11 West Way

Address line 3:

Oxford

Postal town:

Post Code:
[REDACTED]

Telephone number:

018652 69092

Email:

[REDACTED]@savills.com

Part B - Your comments

3 Please provide your comments below.

Dear Sir/Madam

Please see attached comments submitted on behalf of the JM Castle Trust in relation to the Thame Neighbourhood Plan.

We have submitted this Representation through the consultation portal as well.

The details for the agent are:

[REDACTED]

Director

Savills

On behalf of the JM Castle Trust

Savills

Wytham Court

11 West Way

Oxford

OX2 0QL

[REDACTED]

[REDACTED]@savills.com

Please can you acknowledge safe receipt.

[REDACTED]

Senior Planner
Planning

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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Other, please specify:

25 July 2024
L 240725 RL - TNP2 submission consultation response - final



Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Abingdon
Oxfordshire
OX14 4SB

Correspondence by email only to:

planning.policy@southandvale.gov.uk

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DL: 07870 999105
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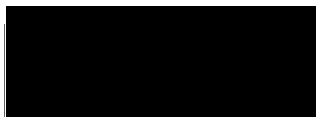
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Conclusion

The site at Rycote Lane is available, achievable and deliverable, being under the control of our Client who has already made good progress on the surveys and technical reports needed to support the future development of this site.

I trust that the above provides a useful contribution to the process, however, should you have any points of clarification or require any further details please do not hesitate to contact me at the above address. Through the submission of this representation our clients request they are given the opportunity to appear any public hearing held as part of the Examination of TNP2.

Yours sincerely


Director

Response 49: ID ANON-MT75-C6HQ-Y

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 13:23:57

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Steve Wilson

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support the ethos of teh Thame Neighbourhood plan but recognise that it may be hard to justify with quantifiable benefit in advance

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Response 50: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 16:45

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Inspector of Historic Buildings and Areas

Organisation (if relevant):

Historic England

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post Code:

Telephone number:

0207 973 3700

Email:

[REDACTED]

@HistoricEngland.org.uk

Part B - Your comments

3 Please provide your comments below.

Dear [REDACTED]

I am writing in relation to the following:

NDP: Neighbourhood Development Plan

Thame Neighbourhood Plan

[Case Ref. PL00793310; HE File Ref. CHA; Your Reference.]

Thame Neighbourhood Plan

Yours Sincerely

[REDACTED]

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]@HistoricEngland.org.uk

Direct Dial: 0207 973 3700

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://www.historicengland.org.uk/strategy).

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. Please read our full privacy policy (<https://www.historicengland.org.uk/terms/privacy-cookies/>) for more information.

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:



Historic England

[REDACTED]
Thame Town Council
Town Hall
High St
Thame
OX9 3DP

Direct Dial: 0207 973 3700

Our ref: PL00793310

25 July 2024

Dear [REDACTED]

We welcome the modifications to policy GDH1d which addresses the concerns we raised in our last letter.

We do not wish to make any detailed specific comments in relation to the proposed neighbourhood plan but offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

The government's National Planning Practice Guidance <<https://www.gov.uk/guidance/neighbourhood-planning--2>> on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put



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Telephone 020 7973 3700
HistoricEngland.org.uk

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broader strategic heritage policies from the local authority's local plan into action but at a *neighbourhood* scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/>

If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <http://mycommunity.org.uk/funding-options/neighbourhood-planning/>.





The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: [HE Advice Note 1 - conservation area designation, appraisal and management <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>](https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/), and here: [<https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>](https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/). The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces.>

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/> .





Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the “Traffic in Villages” toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets:

<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>





HE Good Practice Advice in Planning 3 - the setting of heritage assets:

[<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>](https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/)

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans:



[<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>](https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/)

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment :

[<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>](https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/)

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Yours sincerely,


Inspector of Historic Buildings and Areas
@HistoricEngland.org.uk



Response 51: ID ANON-MT75-C63G-Z

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 17:11:19

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

■

Name:

■■■■■■■■■■

Job title (if relevant):

Planning Director

Organisation (if relevant):

Stoford Properties Limited

Organisation representing (if relevant):

Stoford Properties Limited

Address line 1:

24-26, Ludgate Hill

Address line 2:

Address line 3:

Postal town:

Birmingham

Post code:

B3 1DX

Telephone number:

01212346699

Email:

■■■■■■■■■■@stoford.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

please find attached, our representations to the TNP2

You can upload supporting evidence here:

240725 Final Representations.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

The proposed changes are within our submitted (attached) response

Previously submitted representations are not attached, but can be submitted on request. We trust these are on file already?

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

The TNP2 has undergone a journey whereby decisions to remove earlier draft allocations (ie the land being promoted by Stoford) and allocate an alternative site instead (which wasn't previously an option), has been done without justification. Rather, it has been done as a result of public pressure and not for sound planning reasons. The evidence base requires examination too.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

**Representations in Response to the
Thame Neighbourhood Plan**

Submission Version

25 July 2024

0121 234 6699

These representations are made by Stoford, in respect of land that Stoford control at Thame. Stoford control 15.03ha to the east of Howland Road, and directly adjacent to the previous Thame Neighbourhood Plan employment land allocation. Previous representations have been made to the TNP2 and more recently to the South Oxfordshire Joint Local Plan. A copy of our most recently submitted masterplan is attached to these representations.

The following responses are made to the TNP2 Submission Consultation.

1. Page iv of the TNP2 (Paragraph 3)

1.1. Stoford note that the TNP2, states:

'Thame was also required to provide extra employment land and plan for new community facilities to match the expected rise in population. Regrettably, despite including the newly-built development off Rycote Lane (outside of Thame's boundary), Thame has lost many hundreds of job opportunities since 2011, mostly because of changes in national planning rules. The new Plan aims to address this loss.'

1.2. Stoford disagrees with this paragraph. The new Plan does not aim to address the loss of employment land. Paragraph 1.8 of the Employment Allocations Evidence, prepared by Aecom reminds us that there has been a net loss of 4,812 sqm of floorspace within Thame since 2011 (to 2022). This figure is actually much higher, because in calculating the net loss, the consultants count a gain of 15,973 sqm that arises from development at Rycote Lane P21/S/1632/RM. This site (and planning permission) is located on land outside of the defined Thame Neighbourhood Plan Area on which the current TNP1 was founded. The site is also outside of the area of the defined TNP2 area, shown on Figure 1 of the draft Plan. In preparing for TNP2 the Council have erroneously used floorspace gains of 15,973 sqm to count as additional floorspace within the evidence base, which then drives down, the residual employment land required.

1.3. We acknowledge that the site is adjacent to the TNP2 boundary, but, it is not within that same planning area covered by the TNP2 (or TNP1). If the Rycote Lane site were to fall within another planning authority area (e.g., if it were adjacent to the Thame TNP boundary – but on the north side of Thame and thus in Buckinghamshire, as opposed to being on the west of Thame, and still within South Oxfordshire), then the Town Council would clearly not be attempting to count this floorspace because of the LPA area being different. However, it seems that because the site falls within South Oxfordshire, the Town Council are claiming this as committed development for Thame. This is clearly wrong and misleading.

1.4. We strongly object to this and consider this has the effect of 'under cooking' the employment land requirements recommended within the evidence base later on. The 15,973 sqm (across 4.82ha) at Rycote Lane should not be counted as a contribution towards floorspace between 2011 and 2022 as far as the TNP2 is concerned.

1.5. The TNP2 draft plan itself is clear on its remit within para 1.2:

*'TNP2 covers the entire area **within the boundaries of the Town Council** (Figure 1) [our emphasis], setting out the community's aspirations for the area over the period to 2035 (which aligns with the South Oxfordshire Local Plan) and establishes policies relating to land use and development. These are policies that will guide future planning applications and decisions in the area.'*

- 1.6. If the evidence underpinning TNP2 were corrected, and the 15,973 sqm was not used to offset the wider net loss of floorspace, the overall quoted net loss would be greater. The quoted (net loss) figure of 4,812 sqm referenced at para 1.8 of the Aecom report, would actually stand at an overall loss of 20,785 sqm (between 2002 and 2022.) **The TNP2 is ‘undercooking’ the required employment land within the Plan by at least 4.82 ha.**

What changes Stoford request are made to TNP2

- 1.7. This error in calculating required floorspace could be rectified by the allocation (in part of full) of land within Stoford’s control, east of Howlands Road.
- 1.8. The Stoford controlled land is 15.03 ha gross, however as an experienced developer, Stoford have worked with the context, constraints and opportunities of the site to present a potential scheme (Appendix 1) that would give rise to circa 9.7 hectares (ha) of developable land.

2. Policy TH1 - The Strategy for Thame

- 2.1. We support the policy and the reference to the Council supporting proposals that provide new employment opportunities and improve the stock of existing employment areas. This is important. Stoford have provided evidence in previous submissions to TNP2 confirming interest in the land under our control. In addition, the Aecom 2022 report notes that there remains strong demand for industrial and warehousing space (para 1.9). The reference is made to their agents having received enquiries totaling between 400,000sqm and 900,000sqm as of 1 August 2022 and that this is well in excess of the floorspace available. There is also reference to the absence of suitable existing stock.
- 2.2. Stoford have been working with an existing Thame occupier over the last 12 months and they have expressed their desire to move within Thame but cannot find floorspace to do so, despite the commitments within the town currently being constructed. Therefore, we strongly object to the reference within the supporting text at para 2.3, that refers to it being appropriate to plan for a minimum of 5.5ha of employment land.
- 2.3. We delivered the entire employment allocation at Thame (and more) within 2 years of the last TNP being ‘made.’ It is therefore evident with the demand (our previous representations included evidence at Appendices 3,4 and 5 of the Stoford February 2022 representations) for employment land, and the absence of supply, quoted in the Aecom 2022 report, that 5.5ha allocated now, will be insufficient.

What changes Stoford request are made to TNP2

- 2.4. TNP2 does not go far enough in terms of employment land provision. The baseline (residual requirement) has been incorrectly calculated (as noted above); the provision of just one site at Rycote Lane will not meet the needs of businesses looking to move to or expand within Thame. An increased provision of land is required, or at the very least, a ‘windfall style’ policy that supports the further development of land within the TNP2 area for employment growth, as per paragraph 85-87 of NPPF 2023 which require planning polices to positively and proactively encourage sustainable economic growth. The TNP2 does not currently do this. Rather, it allocates just one site and does not encourage development beyond this.

3. TNP2 Objectives

- 3.1. We consider that the decision of the Council to allocate land to the west of Thame, and not allocate land to the east (land at Howland Road), is contrary to the objectives listed at para 3.3 of the TNP2.

Allocating the land within Stoford's control, east of Howland Road would not affect the sensitive environment around Thame. Appendix 9 and 9a of our February 2022 TNP representations included landscape evidence to confirm this. Our proposals would also not impact on objective 3, the landscape setting of Thame or objective 4, Thame's identity. Our proposed development, unlike other draft allocations, would integrate into the existing built form of Thame- immediately adjacent to the previous allocation (now occupied by Windles and Groves) and immediately east of the residential estate. It is therefore a clear omission within the TNP2 to not allocate the Stoford site when it meets the objectives of the Plan.

What changes Stoford request are made to TNP2

- 3.2. Land at Howland Road, controlled by Stoford should be allocated for employment development.

4. Figure 4, Site Allocations

- 4.1. We object to the omission of the land east of Howland Road, controlled by Stoford, from being allocated for employment use within Figure 4. The image clearly illustrates an unbalanced approach to growth, heavy on the west – where a large housing allocation is made at Oxford Road, and the only site allocated for employment use, at Rycote Lane is located. Conversely, where two housing allocations are made to the south east of Thame, no such employment allocations are made. Therefore some 85 new homes will have no new employment opportunities delivered within walking distance, because land being promoted by Stoford has not been allocated for employment use within TNP2. We consider this to be unsustainable and given that permission in principle has been granted for 60 of these homes at Wenman Road, there is a certainty to these homes coming forward without new local jobs being within walking and cycling distance. This is particularly unfortunate given the policies for the two housing sites include provision for cycle routes along the north of those sites and safer connections crossing Chinnor Road – just south of our promotion site.

What changes Stoford request are made to TNP2

- 4.2. Land at Howland Road, controlled by Stoford should be allocated for employment development.

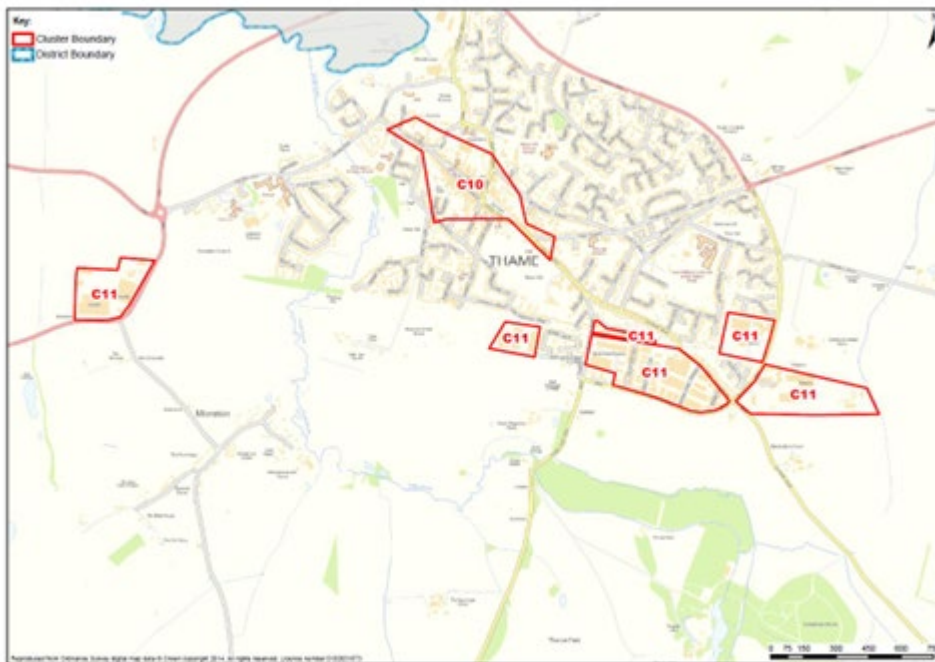
5. Employment Sites

- 5.1. The South Oxfordshire Local Plan, at Policy EMP1 ('The Amount and Distribution of New Employment Land') and at EMP6 ('New Employment Land at Thame') establishes a net requirement for a minimum of 3.5 hectares of employment land to be provided in Thame over the period 2011 – 2035. It is important to note that at the SODC Local Plan examination, Thame Town Council were arguing for a figure closer to 10ha, similar to Stoford. It is irrational and disappointing, given the loss of floorspace since that Examination (e.g. the loss of the DAF site; lost at appeal and another site challenged at that time by Thame Town Council), that the Town Council would now seek a minimum of just 5.5ha within TNP2. It is unclear why the Town Council have changed their mind and produced TNP2, especially given the further loss of floorspace at the DAF site since their view that some 10ha of employment land was required – as recently as 2020/21.
- 5.2. At para 4.54, TNP2 introduces a rather new point, and seeks to rely on using the floorspace arising from land north of Rycote Lane (15,973sqm) by suggesting that even though it is outside of the TNP2 plan area, it is viable to count this floorspace because it is claimed to form part of a 'cluster'. It is a far stretched argument, and one of no foundation. The SODC Local Plan itself makes no reference at any point to there being a 'cluster' in respect of Thame, or to there being a Functional Economic Area (FEA) around Thame, that can be used to justify the decisions now being made within the TNP2. Given that

the north of Rycote Lane site was submitted before the SODC Local Plan was adopted, and examined, it was a known quantum to the Inspector, SODC and Thame Town Council at that time. No reference was made then by any participant or their Examination Statements to there being a reliance or role for the 15,973 sqm at north of Rycote Lane, in terms of meeting any of the employment land requirements that might stem from Thame and that should be considered as part of the TNP2. To try to make this connection now, to simply downplay the employment land provision of TNP2 is disingenuous and is retrofitting the data to downplay the employment land that TNP2 should be making provision for.

- 5.3. TNP2 para. 4.54 claims that land at north of Rycote Lane contributes to the Thame Industrial Cluster, that is referenced in the Employment Land Review for the SODC Plan. An extract showing the cluster is presented below (taken from page 99 of the South Oxfordshire ELR):

C11: Thame Industrial Cluster



- 5.4. What is striking is the clustering of industrial land on the **south east of Thame** – where Stoford have land control. In contrast, it is not at all significant on the western side of Thame, where the Council now try to claim that the new allocation made in TNP2 is contributing to the cluster. Neither is the 5.35ha north of Rycote Lane site shown on the above image – and yet the Council suggest in para 4.54 of the Plan, that the 15,973sqm of floorspace arising from this site can contribute to the FEA. The justification given within para. 4.54 for including 15,973qsm of floorspace as contributing figure of employment floorspace towards the assessment informing TNP2 is flawed and unsound.

- 5.5. We object to the allocation of 7.8ha (gross) of land at Rycote Lane within TNP2, which we consider to be insufficient to meeting Thame’s needs, based on the flawed assessment that counts 15,973sqm (5.35ha) of committed floorspace at the North of Rycote Lane in calculating the baseline for employment land requirements, and on the failure to consider the lack of suitable stock within Thame, alongside occupier demands/occupier enquiries. We therefore object to Policy GDE1: land at Rycote Lane (7.8ha) as being insufficient to meet the needs of Thame.

What changes Stoford request are made to TNP2

- 5.6. We consider that in order for future employment needs to be satisfied within Thame, that the TNP2 should allocate an additional site (which we recommend being land controlled by Stoford, at Howland

Road). In the absence of an additional site being identified, the TNP2 should include a 'windfall' policy that can be drawn upon to assist in the determination of future planning applications, should they be submitted to respond to needs that cannot be met by the one existing allocation at Rycote Lane.

6. Policy GDE1 Land at Rycote Lane

- 6.1. Whilst being insufficient in scale, we question how much development can be achieved within the site, given the criteria within the policy. These include prescriptive wording regarding how buildings must be sited with regards to the contours of the site and where windows and entrances should be located; and criteria referring to minimising visibility of the development (and thus the proposals appear contrary to the TNP2 objectives that concern protecting the landscape around Thame). Finally, we express concern about the criterion relation to archaeological evaluation being required at the Rycote Lane site. This could also affect the net developable area, particularly because the criteria refers to preserving features on site and therefore could affect the quantum of development achievable. By contrast, our evidence submitted with representations in February 2022 confirmed that there were no such limitations for the land being promoted by Stoford.
- 6.2. The overall policy is drafted in such a way that as an experienced developer, Stoford question the net capacity of Rycote Lane as a development site and consider that when coupled with the overall 'undercooking' of employment land, that an additional site is required. We therefore urge the Town Council to allocate the Stoford site to provide the certainty that the employment land required within Thame across this Neighbourhood Plan period, can be delivered and that new housing is not simply fueling a commuter town.

What changes Stoford request are made to TNP2

- 6.3. We consider that in order for future employment needs to be satisfied within Thame, that the TNP2 should allocate an additional site (which we recommend to be land controlled by Stoford, at Howland Road). In the absence of an additional site being identified, the TNP2 should include a 'windfall' policy that can be drawn upon to assist in the determination of future planning applications, should they be submitted to respond to needs that cannot be met by the one existing allocation at Rycote Lane.

7. Windfall Employment

- 7.1. The TNP2 states

'4.56 Indicators point to a continued need for employment land in Thame. The local market is relatively strong, with consistent demand from existing occupiers and new entrants to the market, evidenced by low vacancy rates yet increasing rents. However, limited provision of new employment floorspace in Thame has seen some prospective tenants locate to accommodation in competing towns. When premises do become available, it is the smaller units that are often leased after only a very short time. However, given the strategic location of Thame and its proximity to the highway network, it is also an attractive location for larger units, including the logistics sector.'

- 7.2. The previous consultation version of the TNP2 also included a windfall employment policy and text that stated:

'It is recognised that over time, additional sites may come forward for employment purposes. In this event, proposals should be accompanied by supporting evidence of the demand being met and that the proposals are appropriate and responsive to their location and setting.' (former consultation draft, paragraph 4.50, TNP2)

This text has been removed from the current/submission TNP2 and also, the draft windfall policy, formerly GDE2.

7.3. There is no information or justification made by the Town Council for their decision to remove the draft windfall policy, GDE2. The evidence base also has not been updated, and therefore the decision to no longer have this flexibility within the Plan, is without any firm basis.

What changes Stoford request are made to TNP2

7.4. We consider that in order for future employment needs to be satisfied within Thame, that the TNP2 should allocate an additional site (which we recommend to be land controlled by Stoford, at Howland Road). In the absence of an additional site being identified, the TNP2 should include a 'windfall' policy that can be drawn upon to assist in the determination of future planning applications, should they be submitted to respond to needs that cannot be met by the one existing allocation at Rycote Lane.

8. Character – Policy CPQ1 and Design Principles for employment sites CPQ2

8.1. Para 5.9-5.12 of the TNP2 are also relevant for comment. The paragraphs focus on character and character areas. We learn that a character area assessment has been prepared as part of TNP2.

8.2. Para 5.10: *'This identifies distinctive areas of character within Thame and draws out the defining features, positive character features, opportunities and risk to character of each of them. The character areas identified are summarised below (and mapped on Figure 23)'*

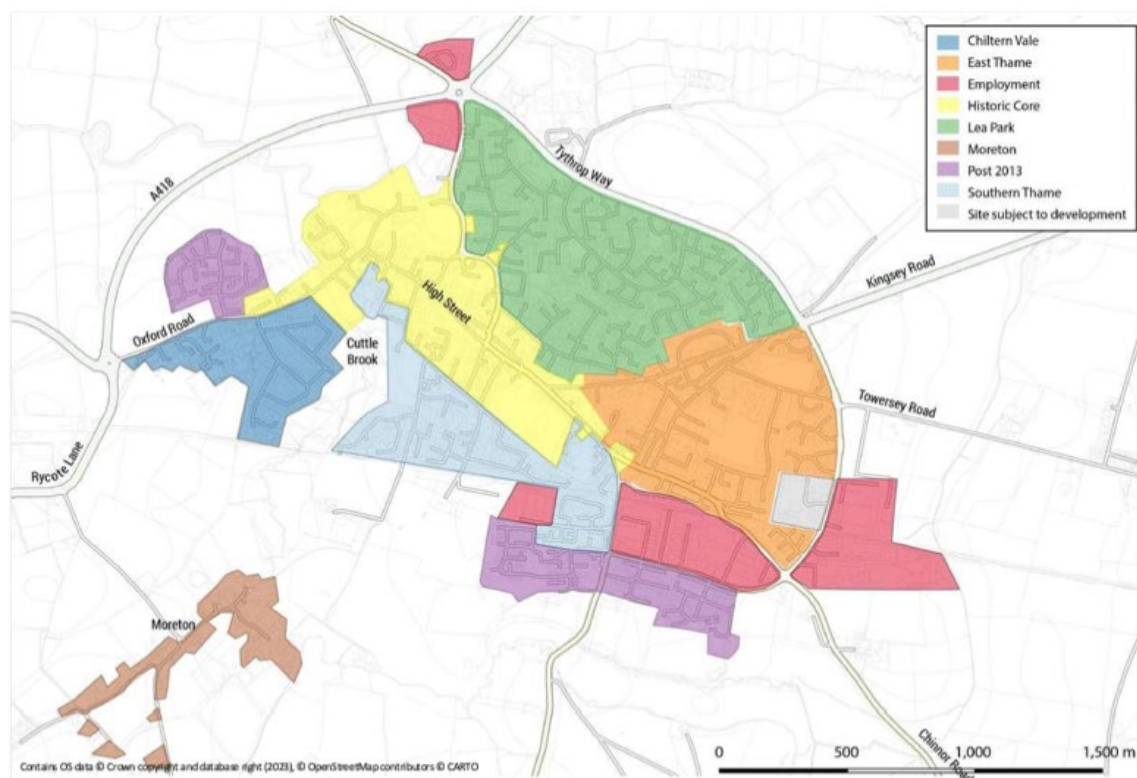


Figure 23: Character areas in Thame

8.3. The Stoford controlled land, east of Howland Road is immediately north and east of the area shaded red, on the south eastern side of Thame. The legend confirms this is an industrial character area. Why therefore, are further allocations for employment land not then made in this location within TNP2?

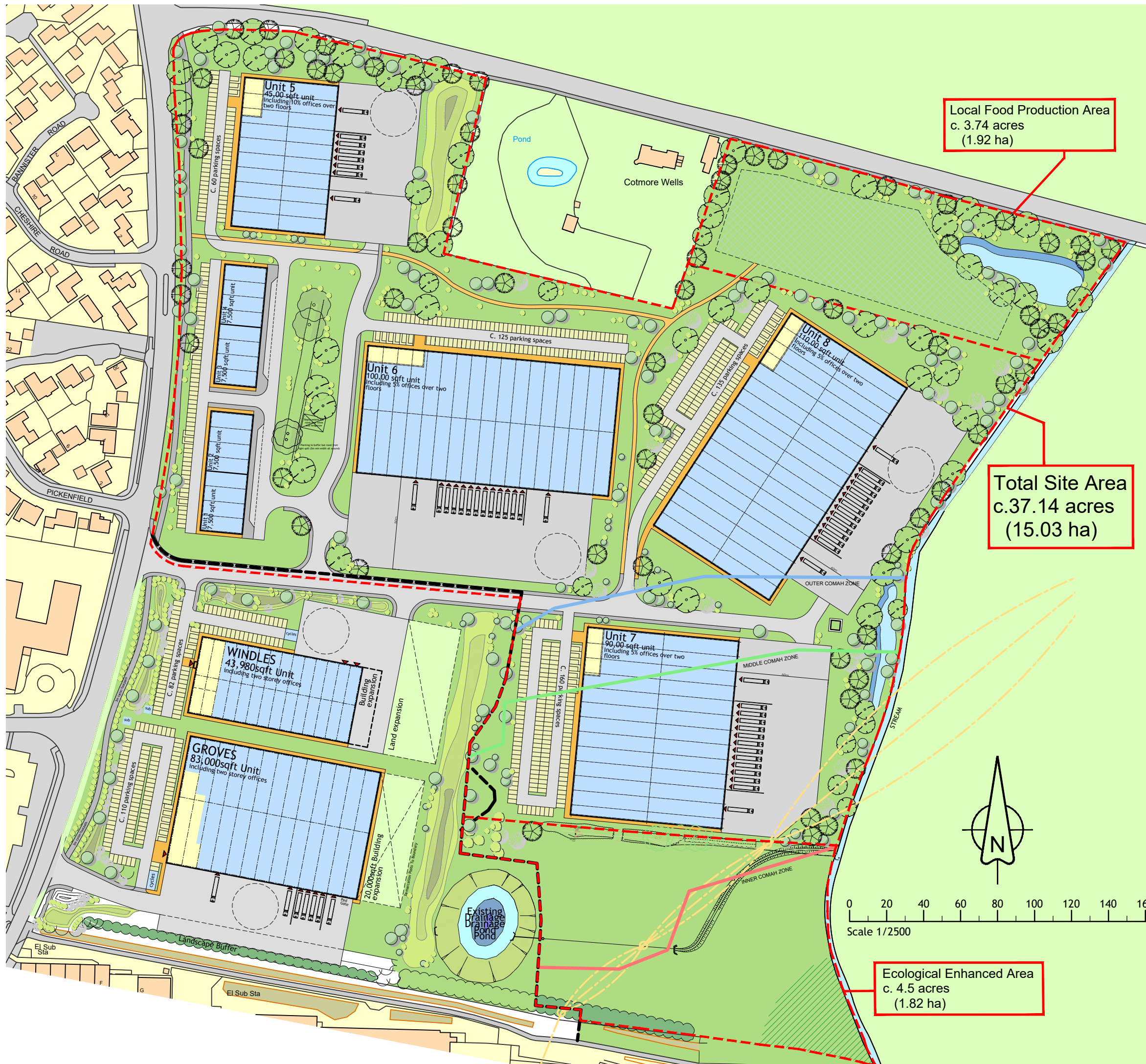
Para 5.11 states:

'It is expected that all new developments will reflect the qualities of each area identified in the Assessment and that applicants will demonstrate how they have taken account of them and wider guidance established in the Design Code.'

- 8.4. Allocating additional employment land to the east of Howlands Road (south of Towersey Road on the above image) would be consistent with this. By contrast, the proposed allocation at Rycote Lane for employment land is not within or adjacent to any character area and would thus be incongruous and inconsistent with the TNP2 approach to character areas.

Appendix 1

Masterplan



Local Food Production Area
c. 3.74 acres
(1.92 ha)

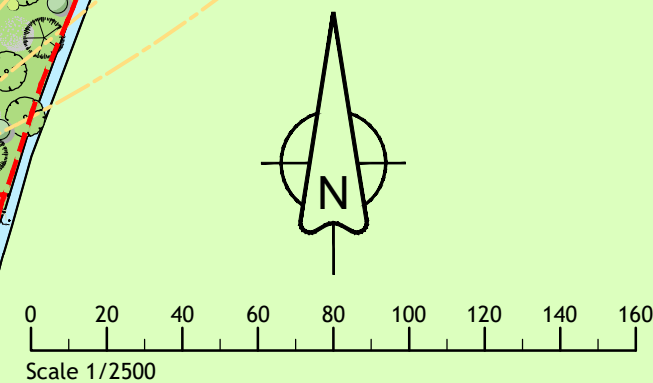
Total Site Area
c.37.14 acres
(15.03 ha)

Ecological Enhanced Area
c. 4.5 acres
(1.82 ha)

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ALL PROPOSALS ARE SUBJECT TO CONFIRMATION FOLLOWING DETAILED TOPOGRAPHICAL SURVEY AND GROUND INVESTIGATION WORK.
IT HAS BEEN ASSUMED THAT OTHER THAN WHERE SHOWN THE SITE IS ESSENTIALLY FLAT WITH NO EASEMENTS TO ABOVE OR BELOW GROUND SERVICES.
ALL PROPOSALS ARE SUBJECT TO CONFIRMATION FOLLOWING LIAISONS WITH RELEVANT LOCAL AUTHORITIES.
PRELIMINARY INDICATIVE DRAWINGS MAY BE BASED UPON INFORMATION FROM VARIOUS SOURCES, THE ACCURACY OF WHICH CANNOT BE GUARANTEED.
WHERE BOUNDARIES ARE SHOWN THESE ARE AS ADVISED BY THE CLIENT AND ARE FOR GENERAL GUIDANCE ONLY. WHILST PLOTTED WITH REFERENCE TO LAND REGISTRY DATA WHERE AVAILABLE AND INTERPOLATED AS PHYSICAL FEATURES ON SITE WHERE POSSIBLE, THEY ARE NOT INTENDED TO REPRESENT DEFINITIVE SITE EXTENTS OR LEGAL OWNERSHIP.
ALL DIMENSIONS AND SETTING OUT COORDINATES TO BE CHECKED ON THE PROJECT SITE BEFORE WORK IS COMMENCED OR MAKING ANY SHOP DRAWINGS.
IF THIS DRAWING HAS BEEN RECEIVED ELECTRONICALLY IT IS THE RECIPIENTS RESPONSIBILITY TO PRINT THE DOCUMENT TO THE CORRECT SCALE. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS STATED OTHERWISE IT IS RECOMMENDED THAT INFORMATION IS NOT SCALED OFF THIS DRAWING. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DRAWINGS AND SPECIFICATIONS.

Area Schedule:

<p>Unit 1: 7,500 sqft unit (696.8 sqm unit) Shared Parking 2 Level Access</p> <p>Unit 2: 7,500 sqft unit (696.8 sqm unit) Shared Parking 2 Level Access</p> <p>Unit 3: 7,500 sqft unit (696.8 sqm unit) Shared Parking 2 Level Access</p> <p>Unit 4: 7,500 sqft unit (696.8 sqm unit) Shared Parking 2 Level Access</p> <p>Unit 5: 45,000 sqft unit (4180.6 sqm unit) Circa 60 car parking spaces 6 docking spaces 2 Level Access</p> <p>Unit 6: 100,000 sqft unit (9290.3 sqm unit) Circa 125 car parking spaces 12 Docking Spaces 2 level Access</p>	<p>Unit 7: 90,000 sqft unit (8361.3 sqm unit) Circa 165 Car parking spaces 12 Docking spaces 2 Level Access</p> <p>Unit 8: 110,000 sqft unit (10219.3 sqm unit) Circa 130 Car parking spaces 12 Docking Spaces 2 Level Access</p> <p>Public Right of Way - - -</p> <p>Comah Zone Key - Inner - Middle - Outer</p> <p>(Information transposed from doc ref: HSL-220118105746-1174 Crosses Consultation Zone)</p>
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Thame
Howland Road

Response 52: ID ANON-MT75-C6HN-V

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 17:15:15

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

■

Name:

■

Job title (if relevant):

Associate Land Director

Organisation (if relevant):

Rectory Homes Limited

Organisation representing (if relevant):

Rectory Homes Limited

Address line 1:

Rectory House, Thame Road

Address line 2:

Address line 3:

Postal town:

Haddenham

Post code:

HP17 8DA

Telephone number:

01844295100

Email:

■

@rectory.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

THAME NEIGHBOURHOOD PLAN (TNP2) 2020-2041 – Submission version

Rectory Homes welcomes the opportunity to comment on the submission version of the TNP2 and wishes to make a number of comments and observations, as set out below. We trust our comments will be considered constructive and helpful as the plan progresses towards being 'made'.

Rectory Homes are a locally based SME housebuilder experienced in delivering high quality residential schemes primarily across Oxfordshire, Buckinghamshire but also the wider home counties. We are a traditional house builder with a focus on positive placemaking by transforming land into places where people can live and thrive in town and village locations. Our approach is to create legacy developments which stand the test of time and designed to reflect the local vernacular using locally sourced natural and sustainable materials.

Growth and Development

Firstly, we note that the required number of homes over the plan period is only 143 after a number of other figures were suggested (previously 339 homes) in earlier versions of the emerging drafts. This is the required, minimum number of houses to be delivered yet, the Neighbourhood Plan should seek to futureproof housing delivery rather than commit to the minimum requirements.

South and Vale emerging Local Plan in addition has not allocated future housing growth beyond strategic allocations which is limited and restrictive. The emerging Local Plan expects Neighbourhood Plans to allocate and distribute housing growth to areas however, it is in our experience that Neighbourhood Plans rely on numbers expected directed from District level. The two are at odds here. One relies on the other but neither are allocating or proposing future growth.

Housing numbers and allocations to specific sites is rightly considered approximate given detailed design could incorporate best use of land and perhaps slightly higher densities. We acknowledge that the numbers are "approximate" which could go up as well as down.

Policy GDH1.11

Sites should generally accord with the housing master planning report which we acknowledge. We do however believe there should be a degree of flexibility with development patterns which take account of individual site constraints that will not be identified at masterplan level. The document should be used as a guide and not rigid.

4.3

The land swap proposed areas of green space are now built on between TNP1 and the new TNP2. The area being constructed was originally shown as green space and extension to the Cuttlebrook Nature Reserve. This is now shown as development areas due to archeological issues with land to the west.

The land to the west now proposed as green space is not included within any planning application red line and therefore, not guaranteed as public open space as suggested and proposed. We envisage that if this is proposed as open space is should be incorporated into good design within any planning application.

4.43

First Homes – the proposed policy is restrictive. The percentage discounts should align with national guidelines. Properties should be at a discount of a minimum of 30% and subject to the price cap of £250,000. This will reflect the market position and if there is no demand, then the prices will be adjusted through the course of sales.

Policy NEC1 – The Cuttlebrook Corridor

We commend and welcome the improvement of sustainable features identified including the information from Thame Green Living. We do believe that further improvements should encourage connectivity to the green corridor through joint cooperation of all developers who have developments or land adjoining the Cuttlebrook Nature Reserve/wider corridor.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 53: ID ANON-MT75-C6HF-M

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 17:23:02

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Dr

Name:

Chris Hatton

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

My name is Dr Chris Hatton and I live with my wife and two children in Thame. I significantly object to the proposed Neighbourhood plan due to locations of development, the lack of consultation with the current residents, the lack of inclusion of relevant other information and its conflicts with the current made NP.

The majority of my focus of objection is based on the Land North of Oxford Road, which is the largest development proposed, but I believe there has been a genuine lack of engagement with locals in making this plan unrepresentative of the people. This is highlighted in the very low engagement of locals in the last round of consultation. This general lack of engagement has been noted with other contentious issues within the NP, notably Windmill Road and the Cattle Market.

From this point on I will try to refer to this NP I am commenting on as TNP2, the made NP as TNP and the live planning application for building on this land as the live planning application.

Summary of objections of the land North of oxford Road

- This is directly against current planning permission and the made Thame Neighbourhood Plan (TNP) which allocates this as green space not to be developed, confirmed by referendum
- 1392 people have directly objected to any development of this site, this is not included in the TNP2, but far outweighs any identified support from an unprotected survey
- This site has a live planning application with ~265 objections vs 1 marginally supporting statement, this far outweighs any 'supportive' information submitted as part of TNP2 and again this is has been completely ignored in this submission, making it clear this plan is not representative of the people of

Thame

- The submission does not include lots of the comments by relevant bodies that objected to the scale, density and lack of integral green space in the live application
- In the first two phases of consultation it clearly stated this area of the Land of North of Oxford Road could not and would not be developed as it is against the current neighbourhood plan
- This plan presents more houses than identified for the reserve site F in TNP 77 vs 100. And provides no additional green space but increases the housing by 50%
- This field acts a flood plain protecting Thame and surrounding regions, building here will undoubtedly increase flood risk elsewhere (I note most responses as part of the planning application, in the media and on social media thinking the proposition of building here is crazy)
- NPFF policy 161 states all plans should apply a sequential, risk-based approach to the location of development taking into account all sources of flood risk and the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property, TTC have completely ignored this by putting this site forward
- The flood risk assessment supplied as part of the live application, shows the flood risk to be significantly lower than the floods seen this year and the flood risk shared by the environment agency
- TNP2 still narrows the Cuttle Brook corridor to a pinch point and was supposed to provide locals and wildlife with an extension of the Cuttle Brook and Rycote Meadow, not build on top of it
- Multiple rare and protected species utilise this land including, Otters, Water Voles, Badgers, Grass Snakes, Bats, Kingfishers, Fieldfare, Peregrine Falcon, Woodpeckers, and potentially Great Crested Newts
- The impact of amenity is significant with no extra infrastructure proposed
- No green space is proposed between the current estate and the new estate
- The density and intensity of the build is in no way in keeping with the area it is to be built (see comments by Landscape officer in live planning application)
- TTC and the applicant cannot simply keep reapplying and hope that through fatigue people will stop objecting

By proposing building here Thame Town Council have shown a complete disregard to their commitments for publicly accessible green space as part of the current estate and TNP. As a resident it is incredibly insulting that while Bloor don't have time to finish our estate (beyond selling the houses) and permissive paths they have the time to plan with TTC to build more houses on an area they agreed to have as publicly accessible green space as part of previous planning permission. I am also incredibly concerned about the further permanent destruction of Thame green space, which is clear from TNP1, TNP2 consultations, Thame Town Council notification suspending access to the Cuttle Brook and Thame Green Living Plan is very important to the people of Thame and already severely lacking. This is also fundamentally against the vision and objectives for Thame, which state the sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk. promote and improve biodiversity.

This particular location for housing had also not been considered as part of TNP1 or TNP2 (consultations and analysis phase 1 and 2) and there had been no suggestion that Reserve Site F would be moved, in fact quite the opposite as each independent assessment (TROY) submitted as part of the reading for the first consultations said this land it not suitable to be built on due the flood risks and encroachment on the legally required specific greenspace and extension of the Cuttle Brook nature reserve. Further, while the whole site (not this specific location within the site) was the most popular of the options submitted as part of the vote at consultation stage 2 of TNP2, most importantly it did not receive the majority of votes, making it unlikely to be confirmed by referendum.

What appears to have happened is the developers Bloor Homes have decided they cannot/do not want to build on the current reserve site F, and in the previous application it simply stated most recent on site investigations have found that the land immediately east of Phase One is less constrained and can be built upon now.

This is the only reasoning given in the previous supportive documentation to moving the site and frankly this is unacceptable, considering Bloor's, TNP and the Council's previous obligations and commitments to this creating this planned green space. Residents have also not received any reassurance that the land with 'potential' significant heritage value will not be built on in the future!

If this goes ahead it will only encourage developers to further break the principles and requirements set out in the Neighbourhood plan and agreed through planning. Reserve sites were proposed in case plans could not be met with original proposals, hence the name. If TTC/Bloor homes indeed deem it is not possible to build on the proposed reserve sites this means unfortunately Thame needs to find somewhere else to build, in a similar way reserve sites are activated in the first place.

There are multiple sites proposed in TNP2 that fit the criteria, will be able to sustain the development, don't straddle a flood plain, offer more housing for Thame as well as infrastructure and are not identified as areas that must be provided as green space, for sites that have already been developed.

I have multiple significant objections to the proposed plans which will outline below. However, my key objections relate to:

- (1) General objections to the proposal including the flood risk, high level of intensification of housing, no supportive infrastructure (no allotments, internal green space, orchards, schools) and lack of greenspace between the proposed new houses and the current development.
- (2) This is inappropriate land for building that is in direct conflict to multiple town, county and national policy requirements and causes destruction of required green space

(1) General objections Drainage and flood risk

As the proposed estate literally sits right next to the Cuttle Brook and straddles its flood plain, there is a clear risk of flooding to the houses on the East side and North side of the proposed development. This is without the addition of all the extra concrete from the new building and infrastructure as well as removal of current green land. The space the developers have decided not to build on and are continuing to suggest is green space for public use regularly floods throughout the year, so it is hardly publicly accessible and is already part of site Fs allocated green space. Further multiple discussions on Lovethame (a Facebook group for Thame residents) around the plan to build here was unanimously derided due to it being a flood plain. I am shocked that considering all the previous independent assessments and local knowledge that this is even being considered especially as part of the general plan for Thame that this specific land should be used as a green buffer to the Cuttle Brook therefore preventing any further flood risks downstream.

I note in the flood risk assessment, as part of the application, the flood risk map appears concerningly out of date. With the flood risk levels shown on the environment agency much higher than the baseline for this submission. Subsequently the 100 year plus 31% grossly underestimates the flood risk to building on this land. Let alone any potential run off and increase of flood risk elsewhere. NPFF policy 161 states all plans should apply a sequential,

risk-based approach to the location of development taking into account all sources of flood risk and the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. I note for some reason this has not been applied for this proposed development again when multiple other sites around Thame would provide no such flood risk.

I am also extremely concerned about the current sewage situation on the estate. Even without 100 houses being added to the estate, the sewage system is already at breaking point. Not only do Thames water have to regularly pump the sewage works (daily during lock down), more than once raw sewage has flooded onto the estate, covering peoples gardens. If any more houses were added to the house downstream, as being proposed, this would only be worse. Finally, Thames Water have also advised previously that with current infrastructure this site would not be able to sustain more than 49 houses and this cannot be changed without significant disturbance to current residents. Further during recent flooding, not only did the fields flood right up to the proposed estate, raw sewerage was also released directly into this area by Thames water. Again this problem would only be further exacerbated by building more houses directly between the current estate and the flood plain. Impact of amenity
This would permanently affect all residents of Thames access to green space.

The plans only offer a reduction in green space, it also offers no schools which are all already at capacity (in fact Reserve Site F was activated because schools could not build on the land), no extra nurseries, which are already oversubscribed, we had to go outside of Thame and apply before our children were even born, no green space within the development, no orchards and no extra healthcare. In fact apart from adding additional houses this proposal only takes away from Thame, which is already over saturated with houses compared to the amenities mentioned.

Loss of Privacy

The Houses on the current estate were designed to look outwards onto a green space in Victorian style (see design brief). The proposed development is directly in front of this and will result in loss of privacy in contradiction to the design brief agreed by all parties. This design also means these houses will likely be in the shadow of new houses and therefore have a significant impact on light. This Victorian style also minimises opportunities for crime and provides clear definitions of public and private space and is recognised as best practice (see design brief). Thames Valley Police have advised they cannot support the estate in its current form - which are problematic in terms of potential for crime and anti-social behaviour. Would this then be classed as a new separate estate? or part of our Thame meadows? My major concern is the loss of privacy to the houses at the end of Weavers Branch and lack of green space being proposed between the new estate. This has been standard on other phases of the current estate and across further adjoining sites in Thame. In fact, the current landowner has complained about the lack of privacy for their land from our estate and has erected chipboards on the fence of the development. I would suggest making a reasonable green space between the estates, as a green corridor, which is seen as part of the proposal but removed as part of the plan and also increasing the number of fruit trees to make an orchard. This would help the loss of privacy and differentiate between the estates and could also potentially provide a cycle lane/path linking the proposals.

Traffic and car parking

This proposal not only moves the site but it also changes access to running through the current estate. Site F estate was not designed for this and is already parked up. Also the Estate was designed to be built East to West (Phases 1,2 and 3). This means that construction traffic never met pedestrians. Not only does this proposal not have another entrance which could be a risk if the road is blocked in an emergency, it also now plans to run all traffic through the same entrance, which it was not designed for. I am already aware that sadly even with the current plans a builder was killed by construction traffic, a dog has been killed by a car, and at least two car accidents have happened leaving the estate to Oxford Road. What I do not understand is why the current entrance to this field is not being proposed could that not feed both new phases of development? I believe it is owned by the current landowner and it is currently regularly used as access to HGV and tractors particularly for transporting horses. If the plan was to go ahead, I would suggest keeping the current access, and if the land owner is not happy with that how do they possibly think it is fair it instead is accessed through a busy estate, which has been designed to allow children to play in the street (Submitted design documents).

Noise, dust, fumes and disturbance

No distance is currently proposed between the current estate and the new estate. In fact on the East side the proposal directly encroaches onto the current estate. Elsewhere in Thame when sequential building has occurred green spaces have been left between estates. E.g. Site C and reserve site C and Site D and previous building etc. Building so close to the current estate will no doubt provide significant noise, dust, fumes and disturbance to the current residents. Not only would this negatively affect residents, I am extremely concerned about the proximity to AONB, the Cuttle Brook and the nature reserve, again I would expect significant irreversible negative ecological and AONB effects from building.

Character of area

I am frankly staggered that this submission appears to have ignored the advice on the live application from the Heritage Officer, Landscape Officer and the Urban Design Officer. The Heritage officer stated this would have significant impact on heritage assets including the destruction of hedgerows. The landscape officer summarized as follows: 'Whilst some development within the site may be acceptable, the level of development proposed does not allow adequate space for landscape mitigation, either on the boundaries or within the site, and extends significantly into the Cuttle Brook corridor, narrowing it to a pinch point. The proposals would result in landscape harm, contrary to policy ENV1 of the Local Plan, and would not respect the existing landscape character, contrary to policies DES1 and DES2. Views to the countryside from Oxford Road will be blocked, contrary to TNP policy ESDQ21. The proposals lack tree planting, contrary to the NPPF paragraph 131, and other planting within the site to soften the built form. There is a lack of appropriate open space and play provision contrary to Local Plan policy CF5, and a lack of space for a positive SUDS feature contrary to TNP policy ESDQ 11.' This proposal in no way encompasses the character of the area. The density is far too high to be going into green space (TNP). In fact, the density is higher than the current estate, which has even further reduced density next to the proposed development. No green space is proposed between the current estate and the proposal, whereas the current estate has multiple green corridors. A large consultation and planning phase with locals also occurred for the current estate, which has been designed to blend into the local environment. This proposal in its current form however would decrease the character of the current estate and provide a less pleasant place for the new people to Thame to live. Reserve site F (TNP) is enclosed by road and was able to take a higher density of dwellings, it seems TTC have not even considered that while the area proposed might technically represent a similar sized space, they have not softened this appropriately to conservation areas or green spaces or the current estate. Also, no suggestion has been put forward to replacing the green area associated with site F, all this proposed site does it take from the local neighbourhood and reduce the quality of life of those living there.

Designated areas AONB/Green Belt/Conservation areas/ Nature Conservation

The proposed site not only sits on top of designated green space it sits directly next to the to the Cuttle brook and Rycote Meadow which is of

considerable vintage and its floodplain meadow is one of our botanically richest habitats(TGLP), of which ever fewer now survive in this country. The idea of the designated green space associated with Site F was that it would provide an extension of this ecologically and botanically diverse area providing a real resource to Thame and the site F residents and preventing the ongoing damage to Cuttle Brook. In fact as this site has been identified as a green space in the previous Neighbourhood plan it should further not be developed as highlighted in TNP, SODP and the NPPF. Building here even with reduction may still negative visual impact from Oxford Road across Rycote Meadow and from the Historic core (the Thame Conservation Area) which backs directly onto this proposal. Further to building directly on allocated green space and offering no further green space, this proposal undoubtedly represents a net loss in biodiversity and also proposes pulling down all hedgerows (As described above, this is in breach of multiple Town, County and National planning policies).

I struggle to understand how this proposal can possibly offer a net gain in biodiversity, by building on green space, and offering up publicly accessible green space that is already committed as part of a previous site. Further the reason this site may not appear as botanically rich as rycote meadow is because when breaking their planning permission Bloor homes dug up the whole field for an archaeological dig.

Design, appearance, scale and layout

Not only is it extremely shocking where this proposal has been put forward its design, appearance scale and layout also lead a lot to be desired. I would suggest if this was to go ahead local residents should actually be spoken to and considered if this was to progress. As mentioned earlier the density is too high, leading from an area of decreased density and especially on the borders to the current estate, to open space and to areas of conservation. I would suggest leaving green space between all of these, it would also add a buffer for flooding. There is also nothing clearly sustainable about this development, I would suggest looking at recent eco houses built around Oxfordshire and Buckinghamshire such as those in North Bicester about how this can be achieved.

In summary similar to previous independent assessments this is not an appropriate area for further development and if this area of Thame is still being considered for further development the only suitable locations would be those at the bottom of the estate which had been previously agreed for school expansion. And finally, while I am aware there are archaeological findings of national significance found at the western section of the estate. I am not sure what value anybody gets out of having this area just still be used for crops. A path across this field is by no means a substitute for the green space lost and does not provide additional greenspace expected for a development of over 100+ houses. I think we really need to carefully balance the affect any development has on local ecosystems and our children s futures with that of historical significance, particularly when those of historically significance are just being used for crops and not showcased in anyway.

(2) Inappropriate land for development As this proposal would be built on top of a designated green space identified as part of TNP it directly conflicts with multiple national (NPPF) and local policies. The current proposal is in direct conflict with so many requirements and policies in each of these, particularly the TNP, it is impossible to even summarise in this objection. TNP identifies this specific area should remain undeveloped as open space on the basis of visual impact and relationship to existing landscape.

Thame Neighbourhood Plan

This proposal is in direct conflict with the complete section 11 Environment, Sustainability and Design Quality in TNP, because this proposal is to be built directly on top of green space allocated for Site F.

ESDQ2 states: Developers must provide publicly accessible open space in the locations required and that these have been carefully considered in the overall spatial vision for Thame, so that a connected network of new and existing spaces is provided. ESDQ9 states that site F must provide riverside walks within allocated natural green space and ESDQ21 states development proposals, particularly where sited on the edge of Thame or adjoining Cuttle Brook, must maintain visual connections with the countryside Building here would literally remove visual connections from the North, East, West and most significantly the view from the South and the protected space on Oxford Road across Rycote meadow. TVP have already confirmed again they are concerned with this proposal and previously stated it would breach ESDQ23 which states streets within new development must be designed as pleasant places to be.

The proposal undoubtedly also breaks the site allocation policies HA1 and HA2 as this proposal would be built directly on top of the specified 17 Ha natural green space designed to extend the Cuttle Brook Nature Reserve allocated as part of Site F. HA1 also states the development must be implemented in accordance with the principles set out in the Design Brief. In the design brief it clearly references figure HA2 and says the site is required: to provide pedestrian access to the areas retained as landscape to the north and east of the development site, as set out in Figure HA2 of the TNP (p7 of this Brief). This brief was signed off by South Oxfordshire District Council (SODC), the landowners and Bloor Homes. The deed of agreement and specification of works, which are also signed by SODC, the Landowners and Bloor also both refer to versions of figure HA2 and make it clear that this specific land is to be set aside for publicly accessible open space.

Thus, all parties are committed to the plan as described in picture HA2. I am not sure where the idea that this green space is moveable has come from, it has not been agreed with the public as part of TNP2 consultation(until the most recent phase) and it is clear in all agreements and every policy in TNP this 17Ha agreed as part of the allocation of Site F is site specific.

South Oxfordshire Development Plan (SODP)

By conflicting so substantially with the current TNP this proposal also contravenes multiple policies as part of the development plan for South Oxfordshire including policies ENV1 (2,3,5,7,9,7.10), ENV5 (1,2,&3) and TH1. Essentially this is because, the proposal builds directly on a green space allocated as part of TNP rather than protecting it, destroying all hedgerows, and it may indirectly damage the Cuttle Brook and Rycot [answer truncated to 25000 characters]

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

All respondents to the live planning application and the 1392 who signed the petition objecting to the development of the Land North of Oxford Road should be considered as part of this submission.

Other sites should be considered before this for development as per sequential flood tests. Small surveys are (two of which still stated this area should remain undeveloped) are not significant enough

If any development was to go ahead on this site the minimum requirement would be.

Engage with a local working group to come to a solution to this and Windmill Road and the Cattle Market
All hedges to be retained

Scale to reduced significantly (as per comments by Landscape Architect

Green Space separating the new estate to the former estate

Green space incorporated into the development

Cycle path/disabled access connecting the estate parts

Protections on development of the area to be retained as green space

Moved further away from the flood zone and ring road (identified as limitation in public consultation)

Delivery of green space before development

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Thame Town council have actively chosen not to include relevant information regarding development of the site North of Oxford road, which would significantly impact the understanding of the weight of support and/or objection to development.

This is particularly concerning as TTC recognised the level of concern for this development and advised people to directly submit their responses to the planning portal to make sure they were heard. Now they have actively chose to ignore them in this submission.

Further Thame Town Council have actively refused help/support from locals in developing the plan 'as it would slow it down and create bottle necks'. This is against the principles and guidance of Neighbourhood planning set out the Government and TTC. I have two recorded email trails I am happy to share from over the past two years were my offer of support, as I was interested and may be affected by the plan was refused and not taken up as it may slow the process down.

Government Guidance on NP

'Where a parish or town council chooses to produce a neighbourhood plan or Order it should work with other members of the community who are interested in, or affected by, the neighbourhood planning proposals to allow them to play an active role in preparing a neighbourhood plan or Order.'

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

[REDACTED]

Response 54: ID ANON-MT75-C6H2-Z

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 17:54:14

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Dr

Name:

Emily Tatlock

Job title (if relevant):

[REDACTED]

Organisation (if relevant):

[REDACTED]

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Thame

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Why does this neighbourhood plan include development on the protected allocated green belt land (area north of Oxford Road) when there:

a) are brownfield sites available

B) is no access for these new developments

C) has been no consideration of the huge numbers of objections Including from the environmental agency, and a petition signed by hundreds of thame residents, in this new town plan.

It is poorly thought through, inadequately provisioned and not good enough for Thame. It might have been if the thoughts of the residents had been gathered in a consultation before this was put together.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

No development in the area north of Oxford Road. Use a brownfield site, or at least one which has appropriate road access.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

There has been no consultation as yet.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 55: ID ANON-MT75-C6H1-Y

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 17:58:51

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Christopher

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Thame Town Council instructed us to submit our comments through the planning portal, but these were subsequently ignored in the planning process. To recap, around 265 objections were raised, and 1,392 people signed the petition opposing any development on this land.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Response 56: ID ANON-MT75-C6HY-7

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 19:23:44

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Richard Dalton

Job title (if relevant):

[REDACTED]

Organisation (if relevant):

[REDACTED]

Organisation representing (if relevant):

[REDACTED]

Address line 1:

[REDACTED],

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

See Upload

You can upload supporting evidence here:

Town Plan 2.jpg was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Overall, I consider that the Thame Town Plan is made for and in the best interests of the town and residents apart from the further development of the land at Oxford Road (GDH1d). In this respect I repeat my observations submitted in relation to the planning application made by Bloor Homes for development of this land.

Firstly I would like to compliment Bloor Homes on their magnificent presentation showing the many, many pictures/representations of what idyllic houses and country walks look like. Unfortunately, this does not relate to what this development will look like. Their "Parkland" is in fact the water meadow which for great periods of time can't be crossed even wearing wellingtons.

They go on to describe, most reasonably, what they will be doing to mitigate the problems they are creating! It tells you how they are helping the environment and creating a first class amenity for Thame. It does give you a warm feeling inside but again reality is that this will not happen. Bloor are not great philanthropists, they are looking to make as much money as they can, having scant regard for the problems they will leave behind.

I do object to this planning application for the following reasons.

The enlarged estate would consist of 360 dwellings, generating 600-700 cars, plus delivery vehicles, service vehicles etc. all entering and leaving the development through a single road. The existing road structure on the estate plus the disgorging of vehicles on to Oxford Road would not cope, would be totally unsafe, would create gridlock and would be downright dangerous.

Houses would be constructed with their feet dangling into/close to the waters on the flood plain and with the river flooding more frequently (and set to become even worse) the additional water runoff from the development would add to this existing major problem. Water levels have been greater this year and more prolonged and the proposed development would cause even greater problems here and for villages downriver where roads are now regularly impassable with flooding.

Existing infrastructure is at breaking point with sewers, water supplies, schools, doctors surgeries, parking in town, (not all elderly people can walk or cycle into town), all operating at extreme levels. The existing sewerage system on Thame Meadows has had to be supplemented on many occasions by tankers removing waste and now it is proposed to add the new development to it!

I think that now is the time to act in the best interests of our Town and to try and help the environment and not to add to the problems that will have to be faced by our children and grandchildren.

There were circa 265 objections to that planning application, including neighbouring Parish Councils and, I am advised, 1392 people signed a petition objecting to any development on this land.

At the Public Meeting in relation to the Bloor Planning Application, the Thame Town Council told us to direct our comments to the planning portal but it seems that they have decided to go ahead and recommend the allocation of this land as part of the Town Plan 2.

I would like my comments to be considered.

Response 57: ID ANON-MT75-C6H7-5

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 20:28:43

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Judith Hunter

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I am broadly in favour of the plan but have reservations about the provision of sufficient parking in the town.

The council says it wishes to encourage the use of buses but I would like to point out that the 121 leaves the town hall within minutes of the number 40, thus meaning there is the nearly an hour and sometimes more, before the next bus. There needs to be a half hourly service during the day for this to be a viable option to driving.

I have also noted that the plans for the Howland Road area show the old warehouse instead of the Phoenix Park development.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

I feel that the council should show openness in its decision making.

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

██████████

Other, please specify:

Response 58: ID ANON-MT75-C6J9-9

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 21:57:30

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Jack Gifford

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

My partner and I have been living in Thame since April 2024, and we absolutely love the town. Our home is ideally situated, being just a short 10-minute walk from the town center and only 2 minutes from the scenic Phoenix Trail. This convenient location allows us to easily enjoy all the amenities and natural beauty that Thame has to offer.

Thame itself is a charming and vibrant community, providing all the necessities one might need. The town boasts a variety of local shops, boutiques, and groceries that cater to a range of tastes and preferences. However, the sheer number of coffee shops has led me to question the necessity of adding yet another one, such as Gail's. While Gail's is a popular, I wonder if its presence was essential given the existing plethora of similar establishments.

In my opinion, Thame would greatly benefit from the addition of a large supermarket, such as an Aldi. This would not only provide more shopping options for residents but also offer competitive pricing, which is especially important in today's economic climate. A supermarket like Aldi could accommodate the needs of the local community more effectively, providing a wider range of products and making grocery shopping more convenient for everyone.

Despite this, we are incredibly happy with our decision to move to Thame and can genuinely see ourselves living here for many years to come.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

██████████

Other, please specify:

Response 59: ID ANON-MT75-C6JD-M

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 23:02:23

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Matthew Docksey

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Happy with the plan - the residential areas chosen make sense and take on board feedback from previous consultations

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

No changes

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Response 60: ID ANON-MT75-C6H3-1

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 23:12:25

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Councillor

Name:

Pieter-Paul Barker

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Thame

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Policy GDR1 7c should include a cycle path to Barley Hill School across the cattle market site and connecting to Lea Park via Parliament Road

6.10 Health Centre facilities need to expand on the current site, can this be made clear in the NP

Flooding policy NEF1 This does not seem strong enough, flood zones should not be built on

Project GAATa Strongly support the cycling and walking link to the station which is briefly mentioned here

SF01 Open Space - this should include the triangle of land owned by Thame Town Council north of Tythrop Way and south of the sewage treatment plan

The NP should allocate the land next to the sewage treatment plant for expansion, as the capacity is insufficient and there is frequent discharge. Thames Water have not fulfilled their obligation to safeguard land for future capacity. The land to the east of the current site was previously used for this purpose and should be safeguarded.

HNA: The HNA mistakenly calculates a deficit in 5-bedroom houses in Thame. This mistake is also reflected in 4.46 of the NP. Space for housing in Thame is at a premium and it is not appropriate to use this for extremely expensive large houses, for which there is no local demand. The errors in the HNA are catastrophic for Thame's housing mix, which is very short of 2-bed housing in all sectors of housing provision.

Policy GDH1e The Elms in point 4 fails to mention that a condition of development is a public walking and cycling route across the site from Upper High Street linked to the roads to the south.

Figure 10 the Concept Masterplan for land south of Wenman Road, fails to show the existing segregated cycle path continuing along the south side of the main road.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

The HNA must be corrected to address the flaws in the housing mix calculation

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 61: ID ANON-MT75-C6JS-3

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 23:26:50

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Dr

Name:

Prad Shanmuga

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I object to the plans to build on the Northwest parcel of land at Oxford Road (Policy GDH1d).

That field area is subject to active flooding on a frequent basis throughout the year after heavy rainfall. This has been seen by residents since the Thame Meadows development was built. The flood evaluation that has been done is inadequate or out of date. There is insufficient evidence that SUDS will be enough to prevent residential flooding in the existing housing or in the new development if built. This puts the existing lower-level housing in Thame Meadows at risk.

The access routes to the new development in the plans via Offa Place and Causeway Close (according to Figure 15) are insufficient for the volume of traffic likely to pass through those narrow residential streets. The level of disturbance to existing residents, and the safety risk presented to pedestrians (often young children) is unacceptable as the pavements are too narrow for what will effectively be a thoroughfare (particularly on Offa Place).

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Explicitly improve flood protection and prevention.

Alternative access route(s) to the new development. Thame Meadows only has single route in or out of the whole development. Adding an additional 100 houses without adding additional access puts strain on an already busy route - this is particularly important as the school proximity puts children at risk.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 62: ID ANON-MT75-C6J5-5

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 23:43:41

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Dr

Name:

Duleepa Shanmugasundaram

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I strongly disagree with housing development on Land site F, north of Oxford Road. This area floods several times per year. The existing suds/ drainage system between Offa Place and land site F would be lost if this point becomes the access site to land site F. The existing drains in Thame Meadows along Roman way have on occasion flooded during heavy rain. Access to the proposed development site would be via Offa Place and Causeway. These roads are not wide enough to cope with the expected increased traffic especially as cars are already being parked alongside the curb narrowing the road. The pavement in Offa Place is particularly narrow at a certain point not allowing even a single person to walk comfortably. I strongly feel that an increase in traffic coupled with the existing lack of parking and narrow pavements will compromise safety especially for the children who play and live Offa Place and Causeway.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Transparency and interest

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 63: ID ANON-MT75-C6JW-7

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 23:44:53

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Amy Wakelam

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The Thame Neighbourhood Plan has been through multiple rounds of consultation and I agree that it achieves the objectives highlighted

Having provided feedback on multiple occasions I am now comfortable with the elements highlighted in the plan

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Thame Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify: