

Briefing Note: Joint Local Plan October 2024 Regulation 19 consultation

Primary sources:

**South Oxfordshire Joint Local Plan Pre-submission publication version Reg19
Draft Policies Map**

Overview

The accompanying document provides the detail of the likely impact on Thame and Moreton of all the relevant proposed policies, supporting text and Policies Map. It does not cover policies that remain largely unchanged from the SODC 2035 Local Plan. It also does not cover those that do not directly or indirectly affect Thame, relatively minor clauses or those that repeat national guidance. Below is a summary that aims to present more notable changes by topic.

Stage protocol

At this stage in the preparation of a Local Plan open comments are not possible. There are instead four basic tests for “soundness”. These are:

- 1) Has the Plan been Positively Prepared, i.e., based on a strategy that meets objectively assessed need for development and infrastructure? Does it meet the unmet needs of other authorities, where sustainable development can be achieved?
- 2) Is it Justified, an appropriate strategy when considered against reasonable alternatives and a proportionate evidence base?
- 3) Effective – can the Plan be delivered over the plan period and based on joint-working on cross-boundary strategic matters as evidenced by a statement of common ground?
- 4) Consistent with national policy, i.e., enabling the delivery of sustainable development in accordance with the National Planning Policy Framework and other statements of national policy.

It can require a certain amount of mental gymnastics to work out how to comment against a policy that could be improved. In this case, all the comments we are likely to raise would best fit under 3) Effective. In most cases it is possible / likely that the proposed policies might not always achieve the hoped for outcome, which means the Plan would not be deliverable over the plan period.

In both the summary below and the appendix I have, however, outlined which policies we could support and those that would raise an objection.

Chapter 4 – Climate change and improving environmental quality

- Policies emphasise a fabric-first approach, i.e., making sure a building is built and insulated to a high standard to reduce energy consumption for heating and cooling. There is reference to the “cooling hierarchy”, recognising the warming world, requiring resilience to flooding etc.
 - An emphasis on the minimum efficiency for space heating demand, minimum energy efficiency for all types of energy used, Passivhaus encouraged. No fossil fuels will be permitted on new buildings.
 - Material usage should be minimised with low embodied carbon materials favoured. Following on from that, retro-fit of existing buildings will be preferred with audits identifying opportunities for retention and refit of individual buildings.
 - All major new development will have a whole-life carbon assessment and will demonstrate embodied carbon by building type per square metre.
- Renewable energy will be supported where located in areas identified as potentially suitable on policies map / in a neighbourhood plan. Community-led renewable energy and low carbon energy proposals will be encouraged and given positive weight where there is evidence of

community support and where there is community profit sharing / benefits / community ownership

- For water efficiency a new standard of 100 litres per person per day for new development with higher efficiencies encouraged, with all new homes having water storage or at least one water butt.
- To ensure water quality, there will be a hierarchy using green infrastructure and Sustainable Drainage Systems (SuDS) ahead of mechanical means. Opportunities to fix historic water contamination issues will be identified and implemented where appropriate. Wastewater will require adequate capacity with major development requiring a Sewage Capacity Assessment. SuDS should have more than one function, e.g. aesthetic, biodiversity, etc.
- **Impact on Thame** – potential benefits include improving air quality and reducing heat island effects and run-off locally and downstream. Regarding renewables, moderate – major, as community groups and businesses have been calling for renewable energy schemes meaning we could see one within the next few years. Sites for major wind, solar, energy storage will, however, remain primarily plan-led.
- **Recommend:** Support.

Chapter 5 – Spatial strategy and settlements

- There is a renewed emphasis on the use of well-located brownfield land. Support will be given to proposals that maximise its use as appropriate to the site's location within the settlement hierarchy.
- Thame is, as before, considered a top-level (Tier 1) settlement all of "which have the ability to support the most sustainable patterns of living through their current levels of facilities, services and employment opportunities. These settlements have a full range of services and a good level of accessibility by public transport. There is a presumption in favour of sustainable development in the built-up area of Tier 1". Moreton is in the bottom-most category, considered "the countryside" where development will not be appropriate unless specifically supported by other development plan / national policy, or a replacement dwelling consistent with the location.
- Thame's outstanding need for 143 homes is noted. Support will be given to ambitious neighbourhood plans that aim to achieve something specific.
- The strategy for Thame (Policy SP7) is a little simplistic. Thame has a finite supply of opportunities for retail, restaurants, pubs etc. While the closure of pubs has provided some new empty spaces the policy has been written as if Thame, like all town centres, will only be saved by more restaurants, leisure, markets and homes. The policy is, however, compatible with Policy GDR2 in the emerging TNP2.
- Support is given for the Thame – Haddenham pedestrian / bicycle route, and Thame's proposals for mobility hubs are welcomed.
- **Impact on Thame** – fewer applications within Moreton, which is by comparison an unsustainable location for development.
- **Recommend:** Support but query what "well-located" with regard to brownfield sites. Also request the Primary Shopping Area for Thame is extended to the Cattle Market on the east side of North Street, in line with TNP2, to encourage footfall between it and the high street.

Chapter 6 Housing

- The Standard Method for calculating housing need will be used; Thame's outstanding commitment of 143 is noted within Policy HOU2. Chalgrove is withdrawn as an allocation.
- A requirement is proposed for affordable housing for all schemes, including specialist older peoples' housing with support. If 10 or more are provided 50% will be affordable housing; 25% social rent, 2.5% affordable rent, 3% First Homes (30% discount), 19.55% Intermediate home ownership. Specialist older person's housing will provide 30% of dwellings as

affordable homes. A mix of tenures 7.5% social rent, 15% affordable rent, 7.5% Intermediate home ownership. Build to Rent will provide 20% of dwellings on site as affordable private rent.

- A specific housing for older people policy encourages communities to identify suitable sites for specialist housing with support for older people through neighbourhood plans. This should be located within walking distance of site amenities or existing amenities.
- Neighbourhood plans are encouraged to establish local affordable housing needs and allocate sites for 100% affordable homes.
- Open book viability assessments will be required where it is claimed affordable housing type and mix cannot be provided. Monies will be clawed back where developments are more successful than proposed.
- A new size mix of affordable / private housing is proposed. The mix is not consistent with Thame's mix.
- A policy is proposed for affordable self and custom-build housing. This proposes serviced plots made available at below market value and restricted in onwards sale to a reduced rate. Homes could be provided by the developer to an unfinished shell with completion by the owner / occupier, granting them an equity share to reduce the deposit and mortgage. The developer could work with a community led housing initiative.
- **Impact on Thame** – Some policies can be supported (see appendix), but there is the potential for harm. There are no new housing allocations in Thame or nearby; the District are using the Standard Methodology set out in current guidance. The outstanding commitment for Thame can be met through TNP2. The clear requirement for older peoples' housing is welcome, but the overall mix of type and size will, however, supersede that proposed through TNP2. Meanwhile, in encouraging communities to meet their own needs it could commit Thame to undertake a specific assessment every five years. It also no longer refers to the "latest evidence" on mix and tenure being taken into account, which would allow robust neighbourhood plan evidence to be used. Local NP groups will have to run community housing projects to affect the mix and type and this is beyond the ability of most parishes and forums.

The effect of the affordable housing policy is likely to be neutral for Thame. Although this might seem to provide another route for the Thame Community Land Trust to access land the reality is the numbers of sites not already subject to options by developers will be limited. Nevertheless, this might make a contribution and should be supported.

- **Recommend:** Object, noting the inability to affect the very local affordable needs of communities will disincentivise neighbourhood plan groups from allocating sites. With no new large allocations granted this will likely reduce voluntary supply. Advise that the latest, robust evidence emerging through the development plan process should always be taken into account to encourage community groups to provide for their own housing needs.

Chapter 7 Jobs and Tourism

- Protection for existing employment sites is continued. Proposals for ancillary uses on existing employment land now have new clauses, detailing that the use must be ancillary to the main business or employment function of the wider site and either alone or combined with other existing / proposed uses would not adversely affect the viability and vitality of a local or town centre. The supporting text gives examples of what would be considered supporting such as shops, hairdressers, gyms, cafes.
- A policy for affordable workspace is proposed for incubators, accelerators, co-working spaces to assist the foundational economy (the glossary defines this as that providing the everyday needs in terms of goods and services of people or add social value), creative and arts sectors. New employment / mixed use commercial should provide workspaces below

market value or financial contributions. An affordable workspace strategy will be prepared to give guidance.

- Emphasis has moved from protecting existing visitor accommodation to supporting proposals for new. It should be well located with good accessibility by active travel and public transport. Dual use of suitable sites is promoted especially if near to major walking and cycling routes.
- **Impact on Thame** – The continued protection of employment land is welcome as is the description of ancillary uses. There is concern a food retailer or dentist could access space on a commercial site at a reduced cost under the “foundational economy” rule, which could undermine local competition. It is assumed the discount will be given in the expected document. Proposals that maximise eco-tourism opportunities will be supported and there are proposals to relax (with suitable controls) the ban on year-round use of seasonal campsites, etc.

Thame benefits from National Cycle Route 57 and its proximity to (and hoped connection to) the Buckinghamshire GreenWay network.

Impact on Moreton – the Dairy campsite could benefit from the relaxation of the seasonal restrictions. New proposals should attract new planning conditions to help protect the amenity of local residents.

- **Recommend:** Support tourism policies, but object and recommend a clause that excludes uses unsuitable within an employment or commercial space and / or that should not be able to access spaces at reduced rates for fear of harm to local vitality.

Chapter 10 Well-designed places for our communities

- Overall “normal” design policies with appropriate signposting to the Design Guide and Codes. There is a new emphasis on wayfinding and a relaxation of public art rules proposed to allow it to be placed near, but not on site.
- The public realm as well as the houses should be indistinguishable between market and affordable homes.
- Design panels could be introduced. These gather professionals across disciplines who offer impartial advice on design proposals and issues.
- **Impact on Thame** – to allow public art to be moved away from the development that gives rise to it is sensible and may benefit Thame. The move to match the public realm between market and affordable housing is a major positive as is the move to support the use of design panels, which have been found to boost the quality of schemes through early intervention.
- **Recommend:** Support.

Chapter 11 Healthy Places

- All major development will now be required to submit a Health Impact Assessment (HIA) to demonstrate how the health and wellbeing impacts of major new development have been assessed and if necessary, mitigated. The methodology should follow the Oxfordshire HIA Toolkit.
- There is now additional focus on enhancing green infrastructure and greening public rights of way and active travel routes. New text promotes “multifunctional, landscape-led sustainable drainage systems to deliver wider benefits” including for amenity, water management and biodiversity.
- Specific amounts of open space for children and teenagers is given within the Plan, 0.55ha on site provision for children and teenagers per 1,000 population. This is split 0.25ha for play and 0.3ha for teenagers, i.e., informal recreation.

- **Impact on Thame** – the requirement to submit a HIA for all major development should promote accessible, socially inclusive schemes that support healthy lifestyles. Support would be given, too, through the Local Plan for the greening of active travel routes, helping legitimise the community’s aspirations in line with identified TNP2 projects.
- **Recommend:** Support but query what “well-located” with regard to brownfield sites. Also request the Primary Shopping Area for Thame is extended to the Cattle Market on the east side of North Street, in line with TNP2, to encourage footfall between it and the high street.

Chapter 12 Nature recovery, heritage and landscape

- Development must deliver 20% biodiversity net gain (above the national minimal guidance figure of 10%). Areas should be protected and enhanced with habitat connectivity restored within the District’s ecological networks.
- Householder extensions – inclusion of wildlife supporting features is encouraged.
- Residential development should include wildlife features at the rate of one feature per 2 units. Boundaries should be appropriately permeable to wildlife.
- A new policy for tranquillity is proposed. Development should conserve and enhance tranquillity, preserving areas prized for tranquillity (Zone 1 in the Tranquillity Assessment). The supporting text explains the Assessment has mapped features that provide calm and connection to nature, e.g. sight or sound of water, sizeable woodland etc. and features that harm tranquillity. This could be sight or sound of roads, light pollution, etc. Thame is within Zone 2, “some tranquillity”, with pockets of Zone 1. Public rights of way and other sensitive locations will be considered when measuring the impact of development.
- **Impact on Thame and Moreton** – mostly positive, particularly the move to identify, protect and enhance tranquil areas and make less tranquil ones more so. Much of the footpath network around Thame and Moreton could benefit from protection.
- **Recommend:** Support.