

THAME TOWN COUNCIL

NEIGHBOURHOOD PLAN (TNP2)

2020 – 2041

BASIC CONDITIONS STATEMENT
(INCLUDING AREA STATEMENT)

MARCH 2024



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Thame Town Council

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1. Introduction

This document

- 1.1 This Basic Conditions Statement has been produced to accompany the Thame Neighbourhood Plan. It sets out how the Basic Conditions prescribed by Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990 are considered to have been met. The Basic Conditions are:
- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan.
 - The making of the Neighbourhood Plan contributes to the achievement of sustainable development.
 - The making of the Neighbourhood Plan 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).
 - The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.
 - Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan. The prescribed condition is that the making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or an offshore marine site (as defined in the Offshore Marine Conservation (Natural Habits Regulations 2007) (either alone or in combination with other plans or projects).
- 1.2 There are two further basic conditions but these only apply to the making of a Neighbourhood Development Order and are thus not considered relevant for this document.
- 1.3 The Levelling Up and Regeneration Act was granted Royal Assent on 26 October 2023. This includes an amendment to the Basic Conditions in respect of general conformity with the strategic policies of the development plan. However, there is currently no commencement date associated with this Part of the Act and, until otherwise confirmed by the Secretary of State, the tests of the Basic Conditions for the Danbury Neighbourhood Plan remain as set out in paragraph 1.1 above.

Key statements, including Area Statement

- 1.4 The Thame Neighbourhood Plan has been prepared and submitted to South Oxfordshire District Council by Thame Town Council. The Town Council is the qualifying body and is entitled to submit a Neighbourhood Plan for the Thame Town Council area.
- 1.5 The Thame Neighbourhood Plan sets out policies that relate to development and the use of land within the neighbourhood area, as shown in Figure 1. The Neighbourhood Area was designated in April 2012 (see Appendix A). The boundary of the Neighbourhood Plan area is the same as the Town Council boundary. The Neighbourhood Plan does not relate to more than one neighbourhood area. There are no other adopted Neighbourhood Development Plans which cover the neighbourhood area.
- 1.6 The Neighbourhood Plan covers the period 2020 to 2041. At the time of commencing work on TNP2 the timeframe to be covered was 2020-2035, in line with the South Oxfordshire District Council (SODC) Local Plan. However, as work has progressed, SODC, with Vale of White Horse, commenced work on a new Joint Local Plan which covers the period 2021 – 2041. The timeframe for TNP2 has been extended to match this, reflecting the direction of travel of new policy. It also means that, should TNP2 be made, it will, at the point of making, have a Plan period of fifteen years. This will allow for regular reviews, in line with the Local Plan.
- 1.7 The Neighbourhood Plan does not contain any policies which relate to excluded development as defined by section 61k of the Town & Country Planning Act 1990.

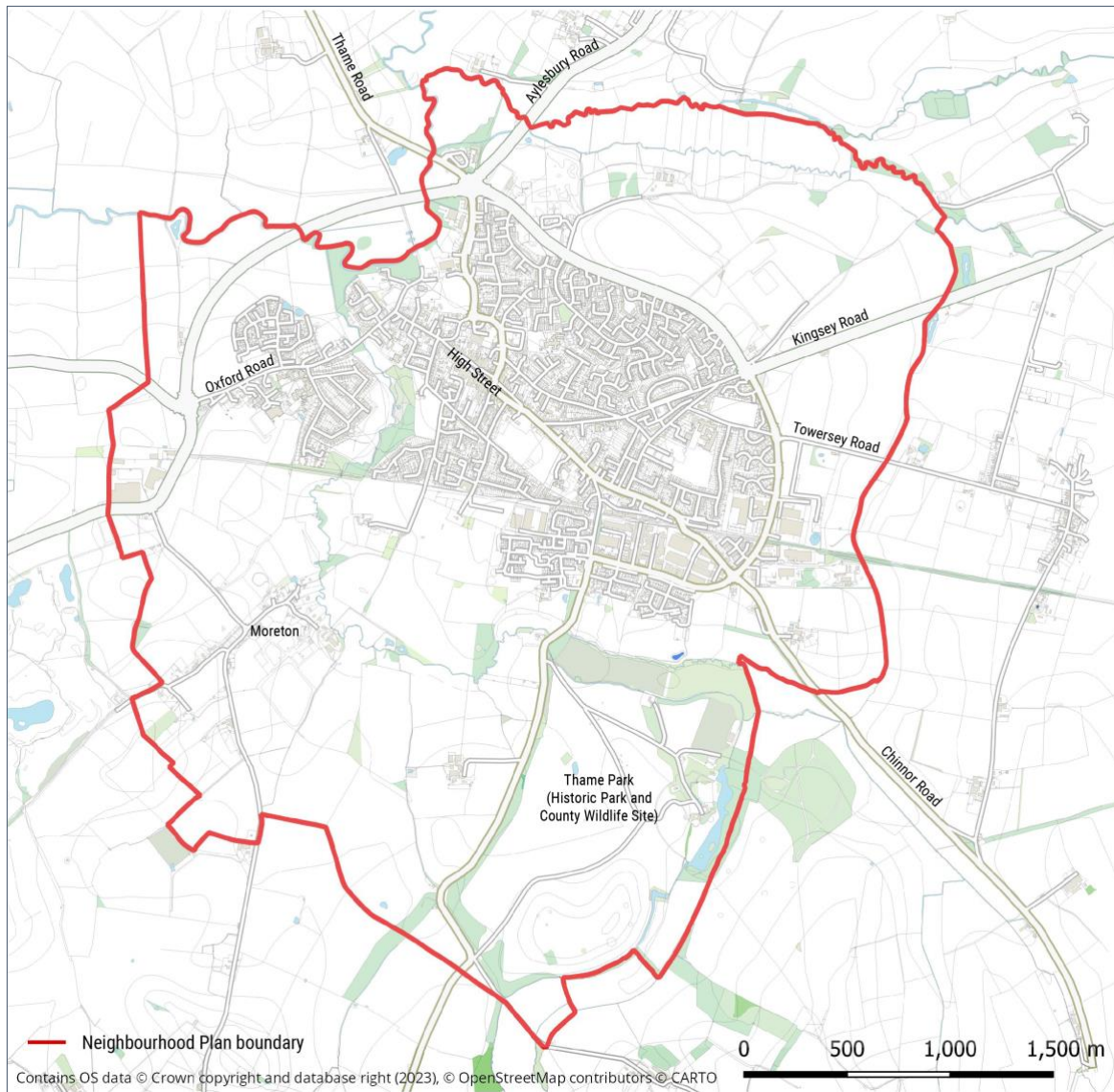


Figure 1: Thame Neighbourhood Plan Area

Vision and objectives

- 1.8 The Basic Conditions Statement refers, where appropriate, to the vision and objectives stated in the Neighbourhood Plan. These are produced below:

Vision

- 1.9 Extensive engagement exercises were undertaken in the making of the first Thame Neighbourhood Plan. These were used to develop a vision for the Plan and formed the basis of policies within that. The vision was subsequently reviewed and agreed by the Town Council through its Annual Town Meeting and through consultation on TNP2. The vision is:

'Thame must maintain its character as a real market town'.

- 1.10 The first Neighbourhood Plan explains that this means:
- Thame must continue to feel compact.
 - Thame must continue to have a close relationship with the open countryside around it.
 - Thame must maintain its markets, festivals and events.
 - Thame must continue to act as a centre for the surrounding area not just its residents.

Objectives

- 1.11 The vision for Thame has been developed into a set of objectives which are presented spatially in the Neighbourhood Plan and which have inform the preferred directions of future growth and other interventions. These are:
1. The compactness and walkability of Thame should be retained, with new homes within comfortable travel distance, by foot and by bike, from the town centre and other social and community facilities located around the town.
 2. The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk.
 3. Growth should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside.
 4. The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained.
 5. New development should be well integrated with the existing built form, contributing to the achievement of integrated communities.
 6. New development should respect the historic growth and evolution of Thame.

Neighbourhood Plan policies

1.12 The policies within the submission version Neighbourhood Plan are:

<i>Policy Ref.</i>	<i>Policy Title</i>
GDH1	Housing development and allocations
GDH1a	Land south of Wenman Road
GDH1b	Diagnostics Reagents
GDH1c	Land at Windmill Road
GDH1d	Land at Oxford Road
GDH1e	The Elms
GDH2	Housing type, tenure and mix
GDE1	Land at Rycote Lane
GDR1	Cattle Market site
GDR2	Town Centre uses
GDV1	Visitor economy
CPQ1	Design in response to local character
CPQ2	Design principles for employment development
CPQ3	Town Centre design principles
CPQ4	Self and custom-build housing
CPQ5	Sustainable design and construction
CPQ6	Street hierarchy
CPQ7	Parking in residential areas
CPQ8	Paving of front gardens
SFO1	Community facilities and services
SFO2	Existing open spaces
SFO3	New green spaces
NEB1	Biodiversity
NEC1	The Cuttle Brook Corridor
NEF1	Flood risk and sustainable drainage
GAAT1	Active travel
GAP1	The Phoenix Trail
GAA1	Alleyways
GAPT1	Public transport
GAM1	Mobility hubs and EVs
GATCP1	Town Centre parking

Neighbourhood Plan ‘aspirations’

- 1.13 In addition to the policies listed above the Neighbourhood Plan also includes a set of wider projects and community aspirations. These do not comprise land use and development policies are not subject to the tests of the Basic Conditions but are listed below for comprehensiveness and referred to as appropriate in the Basic Conditions Statement.

<i>Project Ref.</i>	<i>Project Title</i>
CPQ(a)	Reinstating front gardens
CPQ(b)	Design Review
NESG(a)	Street greening
GAAT(a)	Walking and cycling routes
GAAT(b)	Art trail
GAA(a)	Alleyway transformation projects
GAPT(a)	Park and Ride
GAPW(a)	Wayfinding

2. National Planning Policy

Introduction

- 2.1 The Neighbourhood Plan must show that it has regard to national policies contained in guidance issued by the Secretary of State. This is principally provided by the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) published by the Department of Levelling Up, Housing and Communities.
- 2.2 Work on reviewing the Neighbourhood Plan was initially undertaken in line with the 2019 and then the 2021 versions of the NPPF. However, the NPPF was revised and updated again in December 2023. Appendix 1 of the NPPF sets out transition arrangements for those Development Plans currently in production and which version of the NPPF should be applied when examining these. Paragraph 230 refers to dates by which Plans must have reached consultation by in order to qualify for examination under previous versions of the NPPF. However, this paragraph only refers to Local Plan pre-submission Regulation 19 stage and equivalent stages for work on Spatial Development Strategies. The NPPF is silent on the arrangements for Neighbourhood Plans. As such, and for the purpose of longevity, this Basic Conditions Statement considers the Neighbourhood Plan against the most recent version of the NPPF (i.e.: that published in December 2023).
- 2.3 The NPPF states at paragraph 18 that neighbourhood plans should contain non-strategic policies. At paragraph 21 it states that strategic policies (in the Development Plan) provide a clear starting point for non-strategic policies and that strategic policies *'should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies'*.
- 2.4 The power of a neighbourhood plan is clearly set out in paragraph 30 of the NPPF, which states that *'once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area'*.
- 2.5 This section demonstrates that the Thame Neighbourhood Plan has regard to relevant goals within the NPPF in relation to:
- Delivering a sufficient supply of homes
 - Building a strong, competitive economy
 - Ensuring the vitality of town centres
 - Promoting healthy and safe communities
 - Promoting sustainable transport
 - Supporting high quality communications

- Making effective use of land
- Achieving well-designed and beautiful places
- Protecting Green Belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment
- Facilitating the sustainable use of minerals

2.6 The Thame Neighbourhood Plan has six primary objectives. We summarise them in Table 1 below and identify which NPPF goals each objective addresses. The sections following this provide a summary of how policies in the Thame Neighbourhood Plan conform to the NPPF goals.

Table 1. Alignment of Thame NDP Objectives with NPPF

Thame Neighbourhood Plan Objective	Relevant NPPF goals
Objective 01: 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.	<ul style="list-style-type: none"> • Promoting healthy and safe communities • Promoting sustainable transport • Achieving well-designed and beautiful places • Meeting the challenge of climate change, flooding and coastal change
Objective 02: The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk.	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Conserving and enhancing the historic environment • Meeting the challenge of climate change, flooding and coastal change • Promoting healthy and safe communities
Objective 03: Growth should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside.	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Meeting the challenge of climate change, flooding and coastal change • Promoting healthy and safe communities

<p>Objective 04: The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained.</p>	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Conserving and enhancing the historic environment
<p>Objective 05: New development should be well integrated with the existing built form, contributing to the achievement of integrated communities.</p>	<ul style="list-style-type: none"> • Promoting healthy and safe communities • Promoting sustainable transport • Achieving well-designed and beautiful places • Meeting the challenge of climate change, flooding and coastal change
<p>Objective 06: New development should respect the historic growth and evolution of Thame.</p>	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Conserving and enhancing the historic environment

Delivering a sufficient supply of homes

NPPF Section 5, paras 60-84

- 2.7 The Thame Neighbourhood Plan sets out the following policies that aim to deliver a sufficient supply of homes:
- Policy GDH1: Housing development and allocations
 - Policy GDH1a: Land south of Wenman Road
 - Policy GCH1b: Diagnostics Reagents
 - Policy GDH1c: Land at Windmill Road
 - Policy GDH1d: Land at Oxford Road
 - Policy GDH1e: The Elms
 - Policy GDH2: Housing type, tenure and mix
 - Policy GDR1: Cattle Market Site
 - Policy CPQ4: Self and custom build housing
- 2.8 Through **Policy GDH1**, and subsequent **Policies GDH1a, GDH1b, GDH1c, GDH1d and GDH1e** the Plan allocates several sites for residential development. This aligns with paragraph 69 of the NPPF which states that planning policies should “identify a

sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.” Furthermore, the Plan, through **Policy GDR1**, also highlight potential for the Cattle Market site to accommodate housing.

- 2.9 **Policy GDH1** also includes a set of criteria against which other proposals for housing might be judged, recognising that even though land is allocated for housing, applicants may seek to bring forward other sites. The criteria in the policy seeks to capture these such that they help contribute to the delivery sustainable patterns of development in Thame. Again, this aligns with para. 69 of the NPPF.
- 2.10 **Policy GDH2** supports the principle of delivering a sufficient supply of homes through its alignment with paragraph 63 of the NPPF by stipulating that provision should be made for a mix of housing that meets the needs of the community, based on the most-up-to-date evidence of housing need
- 2.11 **Policy CPQ4** supports the provision of self and custom build housing. This conforms to the NPPF, which at para. 63 states “size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”.

Building a strong, competitive economy

NPPF Section 6, paras 85-89

- 2.12 The Thame Neighbourhood Plan sets out the following policies to build a strong and competitive economy:
- Policy GDE1: Land at Rycote Lane
 - Policy GDR1: Cattle Market Site
 - Policy GDR2: Town centre uses
 - Policy GDV1: Visitor economy
 - Policy CPQ2: Design policies for employment development
 - Policy CPQ3: Town centre design principles
- 2.13 **Policy GDE1** allocates land for employment purposes to ensure that sufficient levels of employment development will be provided over the course of the Plan period to 2035. In addition, **Policy GDR1** notes that a mix of uses, including employment generating uses, might be appropriate for development of the Cattle Market site.
- 2.14 In accordance with para. 85 of the NPPF, which places significant weight on the need to support economic growth and productivity, **Policy GDR2** seeks to ensure

that the loss of shops and related commercial services for the local community will be resisted unless it can be demonstrated that reasonable efforts have been made to secure their continued use for these purposes.

- 2.15 **Policy GDV1** supports proposals for sustainable development that improves the quality and diversity of existing tourist facilities, attractions, infrastructure, and accommodation. This aligns with paragraph 87 of the NPPF which recognises the importance of planning policies to address the specific locational requirement of different sectors.
- 2.16 **Policy CPQ2 and CPQ3** encourage sustainable economic growth by providing a set of principles to inform employment and town centre proposals. These principles help to address the potential barriers to investment, for example by encouraging greater pedestrian connectivity and active frontages. This aligns with the NPPF, which at para. 86 (c) notes that planning policies should “seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”

Ensuring the vitality of town centres

NPPF Section 7, paras 90-95

- 2.17 The following policies within the Thame Neighbourhood Plan aim to ensure the vitality of the town centre:
- Policy GDR2: Town centre uses
 - Policy GDV1: Visitor economy
 - Policy CPQ3: Town centre design principles
- 2.18 **Policy GDR2 and GDV1** seek to maintain the viability and vitality of Thame Town Centre by encouraging proposals which protect existing and provide new opportunities for important local services, facilities, and tourist attractions. These policies align with para. 90 (b) of the NPPF, which states that planning policies should ‘define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre’.
- 2.19 **Policy CPQ3** establishes design principles for town centre proposals, this includes support for the requirement relevant applications to respect the ability for markets and other outdoor events to operate in the town centre. This aligns with the NPPF, which at para. 90 (c) states that planning policies should “retain and enhance existing markets and, where appropriate, re-introduce or create new ones”.

Promoting healthy and safe communities

NPPF Section 8, paras 96 - 107

- 2.20 A number of policies (and projects) in the Thame Neighbourhood Plan promote healthy and safe communities:
- Policy SFO2: Existing open spaces
 - Policy SFO3: New green spaces
 - Policy GAAT1: Active travel
 - Policy GAP1: The Phoenix Trail
 - Policy GAA1: Alleyways
 - Project GAAT(a): Walking and wheeling routes
 - Project GAA(a): Alleyway transformation projects
 - Project GAPW(a): Wayfinding
- 2.21 **Policy SFO2** identifies a range of important open space typologies within Thame that should be retained and protected while **Policy SFO3** supports the provision of new green spaces where it is well designed, safe and accessible for all. This supports the aspirations of paras. 102 and 103 of the NPPF which highlight the importance of providing and protecting green space in line with local planning policies and sustainable development.
- 2.22 **Project GAAT (a), Policy GAAT1 and Policy GAP1** all promote active travel by giving support to development proposals which incorporate improved and extended footpaths and cycle paths, that provide natural surveillance of public spaces and improve cycle facilities. This supports the aspirations laid out in para. 96 (b) of the NPPF which promotes safe places that are not undermined by fear of crime through the creation of high quality public space and legible pedestrian routes, both of which encourage continual use of public areas as well; and para. 96 (c) of the NPPF which calls for street layouts that encourage walking and cycling. **Policy GAA1 and Project GAA(a)** also align with paragraph 96, specifically in relation to promoting safe places that are not undermined by fear of crime. They do this by supporting development proposals adjacent to an existing alley which facilitate passive surveillance.
- 2.23 **Project GAPW(a)** aims to create more legible places which are easier to navigate, function better and be more pleasant to spend time in. The Policy therefore aligns with paragraph 96 (a) which stipulates that planning policies should "...aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people...".

Promoting sustainable transport

NPPF Section 9, paras 108-117

- 2.24 The following policies (and projects) in the Thame Neighbourhood Plan promote sustainable transport:
- Policy GAAT1: Active travel
 - Policy GAP1: The Phoenix Trail
 - Policy GAPT1: Public transport
 - Policy GAM1: Mobility hubs and EVS
 - Policy GATCP1: Town centre parking
 - Project GAAT(a): Walking and wheeling routes
 - Project GAPT(a): Park and ride
- 2.25 **Policy GAAT1, Policy GAP1 and Project GAAT(a)** give support to development proposals that incorporate improved and extended footpaths and cycle paths where appropriate. These policies and projects support the aspirations laid out in paragraph 110 (d) of the NPPF which notes that planning policies should “provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking”. Applications should also give “give priority first to pedestrian and cycle movements within the scheme and neighbouring areas” as per paragraph 116 (a) of the NPPF.
- 2.26 Meanwhile, **Policy GAPT1** and **Project GAPW(a)** promote the improvement of public transport within Thame and therefore align with paragraph 108 (c) of the NPPF, which recognises the importance of identifying opportunities to promote walking, cycling and public transport. Furthermore, **Policy GATCP1** helps align with the NPPF here by supporting the rationalisation of parking spaces in the town centre where that can be justified by evidence and helps bring wider benefits to the town, including public realm improvements and improved active travel infrastructure, supporting a mode shift.
- 2.27 **Policy GAM1** supports the provision of accessible electric charging points. This aligns with paragraph 108 (b) of the NPPF which suggests that transport issues should be considered so that “opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised”.

Supporting high quality communications

NPPF Section 10, paras 118-122

- 2.28 The Thame Neighbourhood Plan sets out the following policy to support high quality communications:
- Policy CPQ4: Self and custom build housing
- 2.29 The Neighbourhood Plan defers to national and local planning policy in respect of communications infrastructure and therefore does not include a specific policy in response to this. However, **Policy CPQ4** suggests that new plots for self and custom build housing shall be provided with connections to utilities and communication infrastructure. It therefore aligns with the NPPF, which at para. 118 recognises that “advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.”

Making effective use of land

NPPF Section 11, paras 123-130

- 2.30 The Thame Neighbourhood Plan sets out the following policies (and projects) to make effective use of land.
- Policy GDH1: Housing development and allocations
 - Policy GDH2: housing type, tenure and mix
 - Policy CPQ1: Design in response to local character
 - Policy CPQ4: Self and custom build housing
- 2.31 **Policy GDH1** establishes principles for new housing sites and allocates land for development. It notes that sites for development should be within or contiguous with the existing built-up area and make use, where possible, of previously developed land. This is consistent with para 123 of the NPPF.
- 2.32 **Policy GDH2** supports the provision of a mix of housing that meets the needs of the community based on the most-up-to-date evidence. This aligns with paragraph 128 (a) of the NPPF which stipulates that decisions should take into account the identified need for housing and other forms of development.
- 2.33 **Policy CPQ1** establishes a set of criteria which new development is expected to meet, including the requirement for development to respond to the immediate context as expressed through plot ratios, scale and massing of development. This aligns with para 128 of the NPPF, which states that “planning policies and decisions should support development that makes efficient use of land”.

- 2.34 The NPPF also recognises that supporting the efficient use of land also means responding to the prevailing character and setting of an area (para 128 (d)) and of securing well-designed, attractive and healthy places (para 128 (e)). This is reflected through **Policy CPQ1** which requires proposals to show how they “respond positively to the setting and character of the area within which it is located”.
- 2.35 Meanwhile, **Policy CPQ4** sets out requirements for plot passports for self and custom building housing that establish appropriate parameters for development. These will establish the form of development and building parameters for each plot, including building heights, footprint, frontages, density and parking requirements.

Achieving well-designed and beautiful places

NPPF Section 12, paras 131-141

- 2.36 This section of the NPPF stresses the importance of high quality design in buildings and places. A number of the policies in the Thame Neighbourhood Plan encourage high quality design. Para. 132 of the NPPF notes that plans should set out a clear design vision and expectations that are developed with local communities to reflect local aspirations. Policies that align with this in the Thame Neighbourhood Plan are:
- Policy GDV1: Visitor economy
 - Policy CPQ1: Design in response to local character
 - Policy CPQ2: Design principles for employment development
 - Policy CPQ3: Town centre design principles
 - Policy CPQ5: Sustainable design and construction
 - Policy CPQ6: Street hierarchy
 - Policy CPQ7: Parking in residential areas
 - Policy CPQ8: Paving of front gardens
 - Policy SFO1: Community facilities and services
 - Policy SFO3: New green spaces
 - Policy GAAT1: Active travel
 - Policy GAA1: Alleyways
 - Policy GAPT1: Public transport
 - Project CPQ(a): reinstating front gardens
 - Project CPQ(b): Design review
 - Project GAA(a): Alleyway transformation projects

- 2.37 A Character Area Assessment has been prepared alongside the NDP which 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 Assessment sits alongside the Neighbourhood Plan and is referenced in policies as appropriate. The Assessment is also embedded in the Thame specific Design Code prepared alongside the Plan and which includes guidance and codes illustrating how proposals for new development should respond to these qualities. Furthermore, each of the site allocations has been subject to masterplanning exercises, showing how these should best be laid out to respond to setting and context.
- 2.38 **Policy GDV1, CPQ1, SFO1 and GAPW(a)** contribute to para 135 (c) of the NPPF by requiring and supporting proposals which show how they respond positively to the setting and character of the area within which it is located. Similarly, **Policy CPQ3** suggests that Proposals for new development in Thame Town Centre should complement the special character of the centre, reflected in the height and massing of buildings, as well as the materials used, building styles and roof heights, as set out in the Character Area Assessment and Design Code that accompanies TNP2.
- 2.39 **Policy CPQ1** seeks to provide Thame with a stronger sense of place. This aligns with the NPPF, which at paragraph 135 (d) suggests that planning policies should ensure that developments “establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit”.
- 2.40 **Policy CPQ2** sets out a series of design principles for employment development. Of note here is the principle which suggests that public spaces and meeting places for employees should be well integrated into the development, including useable and attractive green spaces that are accessible by foot and well overlooked. This aligns with para. 130 (e) which states that planning policies and decisions should ensure that developments “optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks”.
- 2.41 **Policy CPQ6** stipulates that “proposals for major development on the outskirts of Thame must be based around a permeable street network that is safe for people to travel around by foot and by bicycle.” The Policy thereby aligns with the paragraph 135 (b) of the NPPF, which states that “Planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 2.42 **Policies CPQ7, SFO3, GAAT1, GAPT1, GAA1 and Project GAA(a)** support for proposals which facilitate passive surveillance, supporting crime prevention, thus also aligning with the goals of Para 135 (f) of the NPPF.

- 2.43 Para. 135 (e) of the NPPF aims to optimise mixed development including green and public space to create attractive, distinctive places. **Policy CPQ8 and Project CPQ(a)** supports this through attempts to resist/minimise the number of paved front gardens in the area, encouraging green features where possible, and which reinforce the character of the area.
- 2.44 **Project CPQ(b)** suggests that emerging schemes for major development should be assessed through design review, design review for smaller schemes is also encouraged, including those in sensitive or important locations. This aligns with para. 138 of the NPPF, which encourages local planning authorities to ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development.

Protecting Green Belt land

NPPF Section 13, paras 142-156

- 2.45 South Oxfordshire District Council has through the Local Plan assessed the Green Belt and suitability of retaining or releasing land from this for development. The Neighbourhood Plan does not propose to make any amendments to the Green Belt and therefore does not include any policies relating to this, instead deferring to national and local plan policies.

Meeting the challenge of climate change, flooding and coastal change

NPPF Section 14, paras 157-179

- 2.46 The overall aim of the policies (and projects) outlined below is to align with the NPPF's agenda in para. 157 to support the transition to a low carbon future through the careful planning of development and movement:
- Policy CPQ5: Sustainable design and construction
 - Policy CPQ8: Paving of front gardens
 - Policy NEB1: Biodiversity
 - Policy NEF1: Flood risk and sustainable drainage
 - Policy GAAT1: Active travel
 - Policy GAPT1: Public transport
 - Policy GAM1: Mobility hubs and EVs
 - Project CPA(a): reinstating front gardens

- Project GAAT(a): Walking and wheeling routes
- Project GAPT(a): Park and ride

- 2.47 **Policy CPQ5** encourages applications for development to demonstrate accordance with Passivhaus standards to help improve building resource efficiencies. In doing so, it aligns with aspirations set out in para 159 (b) of the NPPF which calls for new development to be planned in ways that reduce greenhouse gas emissions through design.
- 2.48 **Policy CPQ8, Policy NEF1 and Project CPQ(a)** support the introduction of improved flood management infrastructure. This helps to deal with the impact of climate change and aligns with the NPPF, which at paragraph 167 (c) suggest that plans should use opportunities “provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding”.
- 2.49 **Policy NEB1** helps in moderating the impacts of development on climate change through the preservation of green infrastructure for community and public use. This aligns with paragraph 159 (a) of the NPPF whereby development is encouraged to be planned in a way that reduces climate vulnerability through the provision of green infrastructure.
- 2.50 **Policy GAAT1, GAPT1, GAM1 and Project GAAT(a) and GAPT(a)** conform to the NPPF’s aims (paragraph 157) of supporting the transition to a low carbon future and contributing to reductions in greenhouse gases by reducing overdependence on cars. This is predominantly achieved by promoting alternatives, be it through the expansion of walking and cycling routes (and facilities), new public transport services or the provision of accessible electric charging points.

Conserving and enhancing the natural environment

NPPF Section 15, paras 180-194

- 2.51 This chapter of the NPPF promotes the positive impact that planning policies and decisions can have on natural environment, specifically through protection and enhancement of landscapes, biodiversity, character and soil quality. Relevant policies in the Thame Neighbourhood Plan are:
- Policy SFO2: Existing open spaces
 - Policy SFO3: New green spaces
 - Policy NEB1: Biodiversity

- Policy NEC1: The Cuttle Brook Corridor
- Project NESG(a): Street greening

2.52 **Policy NEB1** notes that new development “must manage impacts on biodiversity and secure a minimum net biodiversity gain of 10% on-site, as demonstrated through use of the most up-to-date version of the Natural England biodiversity metric (or any successor document to this) and submission of a biodiversity net gain plan submitted as part of planning application material”. In doing so, it builds upon the goals set out in Para. 185 (b) of the NPPF which says that “plans should... identify and pursue opportunities for securing measurable net gains for biodiversity”. **Policy SFO2 and Policy SFO3** also respond to these aspirations through the identification of existing Open Spaces for protection and support for provision of new Green Spaces which include a range of green space typologies.

2.53 **Policy NEC1** stipulates that “any development proposals within the Cuttle Brook corridor must ensure that the north-south green corridor through Thame is maintained”. This aligns with paragraph 180 (b) of the NPPF which states that “planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services”.

2.54 **Project NESG(a)** supports opportunities to explore how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production. This aligns with para. 185 (b) of the NPPF that promotes the conservation, restoration and enhancement of priority habitats and ecological networks.

Conserving and enhancing the historic environment

NPPF Section 16, paras 195-214

2.55 Paras. 189 and 190 of the NPPF promote the conservation and enhancement of heritage assets to ensure their enjoyment into the future. Relevant policies in the Thame Neighbourhood Plan are:

- Policy GDH1: Housing development and allocations
- Policy GDE1: Land at Rycote Lane
- Policy CPQ1: Design in response to local character
- Policy CPQ2: Design principles for employment development

- Policy GDV1: Visitor economy

- 2.56 **Policies GDH1 and GDE1** align with the NPPF by requiring all applications for housing and employment development to be accompanied by a programme of archaeological evaluation to be agreed with Oxfordshire County Council and undertaken in advance of any proposals being determined.
- 2.57 **Policy CPQ1 and Policy GDV1** respond to the NPPF by stipulating that proposals need respond to the historic and natural assets of the surrounding area, architecture and style, making use of materials present within the built environment that complement Thame's character. These are supported by the Character Area Assessment and Design Code that provide further information on the defining qualities of Thame that should be responded to. Furthermore, the masterplanning work undertaken for the site allocations has considered heritage assets and their setting, and how development should respond to this. The Oxford Road site allocation (**Policy GDH1d**) shows how heritage assets have been responded to by allowing for retention of views of listed buildings and those out towards the surrounding countryside. Equally, masterplanning for the Cattle Market Site (**Policy GDR1**) indicates how development should be of a scale and massing that complements the qualities of the town centre conservation area.

Facilitating the sustainable use of minerals

NPPF Section 17, paras 215-223

- 2.58 The Thame Neighbourhood Plan does not include policies which relate to this NPPF aim, therefore decisions on this matter will need to refer to the South Oxfordshire Local Plan and the Oxfordshire County Council Minerals and Waste Local Plan¹

¹<https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/adopted-core-strategy#paragraph-761>

3. Sustainable Development

Achieving sustainable development

- 3.1 The NPPF, at paragraph 7, states that the *'purpose of the planning system is to contribute to the achievement of sustainable development'*. Sustainable development is defined as *'meeting the needs of the present without compromising the ability of future generations to meet their own needs'*.
- 3.2 The NPPF views sustainability as made up of three objectives: economic, social and environmental. These objectives are interdependent and should be pursued in mutually supportive ways. The objectives are:
- *Economic*: to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - *Social*: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
 - *Environmental*: to contribute to protecting and enhancing our natural, built and historic environment; including 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 a low carbon economy.
- 3.3 The following tables (Tables 2 - 4) summarise how the objectives and policies in the Neighbourhood Plan contribute toward sustainable development, as defined in the NPPF. This demonstrates that the objectives of the Neighbourhood Plan are considered to comprise a balance of social, economic and environmental goals.

Table 2: How the Neighbourhood Plan contributes to economic sustainability

Economic	
NPPF definition: 'Building a strong, responsive and competitive economy'	
Neighbourhood Plan Objectives	<ul style="list-style-type: none"> Objective 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.
Neighbourhood Plan Policies (and projects)	<ul style="list-style-type: none"> Policy GDE1: Land at Rycote Lane Policy GDR1: Cattle Market site Policy GDR2: Town Centre Uses Policy GDV1: Visitor economy Policy CPQ2: Design Principles for Employment Development Policy GAAT1 – Active Travel Project GAAT(a): Walking and wheeling routes
Commentary	<p>The Thame Neighbourhood Plan is committed to creating an environment in which businesses can thrive, with existing social and community facilities protected and proposals for new facilities supported. The policies in the Neighbourhood Plan require any new growth to be well connected and integrated with the existing community, supporting use of existing services and facilities.</p> <p>The Plan also aims to improve accessibility and connectivity within Thame through enhanced walking and cycling routes and the incorporation of public transport services to reduce car dependence.</p>

Table 3: How the Neighbourhood Plan contributes to social sustainability

Social	
NPPF definition: ‘Support strong, vibrant and healthy communities’	
Neighbourhood Plan Objectives	<ul style="list-style-type: none"> • Objective 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. • Objective 5: New development should be well integrated with the existing built form, contributing to the achievement of integrated communities.
Neighbourhood Plan Policies (and projects)	<ul style="list-style-type: none"> • Policy GDH1 (and supporting allocation policies): Housing development and allocations • Policy GDR2: Town Centre Uses • Policy GDV1: Visitor economy • Policy CPQ3: Town Centre Design Principles • Policy SFO1: Community Facilities and Services • Policy SFO2: Existing Open Spaces • Policy SFO3: New green spaces • Policy GAAT1: Active Travel • Policy GAP1: The Phoenix Trail • Policy GAPT1: Public Transport • Policy GAM1: Mobility Hubs and EVs • Policy GATCP1: Town centre parking • Project NESG(a): Street Greening • Project GAAT(a): Walking and wheeling routes • Project GAPT(a): Park and Ride • Project GAPW(a): Wayfinding
Commentary	<p>The Plan encourages the provision of community facilities such as green infrastructure, retail, and flexible multi-use facilities. These facilities provide opportunities for community uses and increased social interaction. The Plan acknowledges that these facilities and active travel routes to connect them can contribute towards good placemaking and a healthier society.</p> <p>The plan also puts community safety at the heart of its policies, with dedicated projects intended to help deliver traffic and pedestrian safety measures as well as policies that provide natural surveillance of public spaces for the same purpose.</p> <p>It also supports provision of a mix of homes, sizes and tenure types, including First Homes and opportunities for Self and Custom build, providing a wide choice to meet local housing needs.</p>

Table 4: How the Neighbourhood Plan contributes to environmental sustainability

Environmental	
NPPF definition: ‘Contribute to protecting and enhancing our natural, built and historic environment’	
Neighbourhood Plan Objectives	<ul style="list-style-type: none"> • Objective 2: The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk. • Objective 3: The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained. • Objective 5: New development should be well integrated with the existing built form, contributing to the achievement of integrated communities. • Objective 6: New development should respect the historic growth and evolution of Thame.
Neighbourhood Plan Policies (and projects)	<ul style="list-style-type: none"> • Policy CPQ1: Design in Response to Local Character • Policy CPQ2: Design Principles for Employment Development • Policy CPQ3: Town Centre Design Principles • Policy SFO2: Existing Open Spaces • Policy SFO3: New green spaces • Policy NEB1: Biodiversity • Policy NEC1: The Cuttle Brook • Policy NEF1: Flood risk and sustainable drainage • Policy GAAT1: Active Travel • Policy GAM1: Mobility Hubs and EVs • Project NESG(a): Street Greening • Project GAAT(a): Walking and wheeling routes
Commentary	<p>Throughout the Plan consideration is given to the protection and enhancement of sites that hold significant historical value.</p> <p>Active Travel is encouraged through connected walking and cycling routes in an attempt to decrease car usage and thus mitigate climate change. Environmental sustainability is also encouraged in the design and construction of developments, as well as the promotion of electric vehicles charging ports.</p> <p>Policy NEB1 contributes significantly to Thame’s role in promoting environmentally sustainable development. It seeks to ensure development does not result in any significant loss of natural assets and aims to enhance the existing. Furthermore, it points developers towards the Natural England biodiversity metric in order to require the provision of a 10% net-gain in biodiversity from development.</p>

4. The Development Plan

Status of the development plan

- 4.1 For Neighbourhood Plans to meet the Basic Conditions set out in the Neighbourhood Planning regulations they need to demonstrate general conformity with the strategic policies of the development plan.
- 4.2 The NPPF establishes what should be covered by a strategic policy in a Local Plan. It states that such policies should provide a clear starting point for any non-strategic policies that are needed and should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies. It states (at para 20) that such policies should help to deliver:
- Housing (including affordable housing), employment, retail, leisure, and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - Community facilities (such as health and cultural infrastructure); and
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 4.3 The South Oxfordshire Local Plan was adopted in December 2020. It forms part of the development plan for the district and replaces the South Oxfordshire Local Plan 2011 and Core Strategy (2012). The Local Plan and its supporting studies set out the future for development in South Oxfordshire up to 2035.
- 4.4 The Local Plan Policies of relevance to Thame are considered in this section of the Basic Conditions Statement where appropriate.

South Oxfordshire Local Plan

4.5 The adopted Local Plan sets out a series of strategic policies. Table 5 below comments on how the Neighbourhood Plan conforms to these policies. It does not include commentary against the following strategic policies which are not relevant to Thame:

- Policy STRAT3: Didcot Garden Town
- Policy STRAT6: Green Belt
- Policy STRAT7: Land at Chalgrove Airfield
- Policy STRAT8: Culham Science Centre
- Policy STRAT9: Land adjacent to Culham Science Centre
- Policy STRAT10: Berinsfield Garden Village
- Policy STRAT10i: Land at Beinsfield Garden Village
- Policy STRAT10ii: Berinsfield Local Green Space
- Policy STRAT 11: Land south of Grenoble Road
- Policy STRAT12: Land at Northfield
- Policy STRAT13: Land North of Bayswater Brook
- Policy STRAT14: Land at Wheatley Campus, Oxford Brookes University

4.6 Although not specifically identified as strategic policies, the table below does provide commentary against other Thame specific policies in the Local Plan, or policies which make specific reference to development requirements in Thame. These include:

- Policy TH1: The strategy for Thame
- Policy H3: Housing in the Towns of Henley-on-Thames, Thame and Wallingford
- Policy EMP6: New Employment Land at Thame
- Policy TC4: Convenience Floorspace Provision in the Market Towns

Table 5. Summary of conformity of the Thame Neighbourhood Plan with the South Oxfordshire Local Plan

Local Plan Strategic Policy	Thame Neighbourhood Plan policy
<p>Policy STRAT1: The Overall Strategy</p>	<p>Policy STRAT1 states that development in South Oxfordshire should be consistent with the overall strategy of supporting the roles of Henley-on-Thames, Thame and Wallingford 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.</p> <p>Through Policy GDH1, the Plan ensures that Thame provides a sufficient supply of new homes. Meanwhile Policy GDE1 will ensure the delivery of employment land.</p> <p>In terms of infrastructure improvements, through Policies GAAT1, GAPT1, GAM1 And Project GAPT(a) the Plan supports the expansion of walking and cycling routes (and facilities), new public transport services or the provision of accessible electric charging points</p> <p>Policy GDR1 allocates a site for a mixed-use development within Thame Town Centre.</p> <p>Policy CPQ3 establishes design principles for town centre proposals, this includes support for the requirement relevant applications to respect the ability for markets and other outdoor events to operate in the town centre.</p> <p>Policy GDR2 and GDV1 seeks to maintain the viability and vitality of Thame Town Centre by encouraging proposals which protect existing and provide new opportunities for important local services, facilities, and tourist attractions.</p>
<p>Policy STRAT2: South Oxfordshire Housing and Employment Requirements</p>	<p>Through Policy GDH1, GDH1a, GDH1b, GDH1c, GDH1d, GDH1e and GDR1 the Plan allocates a</p>

	<p>range of housing and mixed use sites in order to meet the housing requirement for the district.</p> <p>Similarly, through Policy GDE1, the Plan allocates land for employment, helping to contribute towards wider district wide requirements</p>
Policy STRAT4: Strategic Development	<p>Through Policy GDH1, GDH1a, GDH1b, GDH1c, GDH1d, GDH1e and GDR1 the Plan allocates a range of sustainably located housing and mixed use sites. Meanwhile, through Policy GDE1, the Plan allocates land for sustainable employment sites, helping to contribute towards wider district wide requirements.</p> <p>Policy CPQ1 establishes a set of criteria which new development is expected to meet, included here is the requirement for development to respond to the immediate context as expressed through plot ratios, scale and massing of development.</p>
Policy STRAT5: Residential Densities	<p>Policy GDH2 supports the provision of a mix of housing that meets the needs of the community based on the most-up-to-date evidence.</p> <p>Policy CPQ4 sets out requirements for plot passports for self and custom building housing that establish appropriate parameters for development. These will establish the form of development and building parameters for each plot, including building heights, footprint, frontages, density and parking requirements.</p> <p>Meanwhile, Policy CPQ1 establishes a set of criteria which new development is expected to meet, included here is the requirement for development to respond to the immediate context as expressed through plot ratios, scale and massing of development.</p>
Policy TH1: The Strategy for Thame	<p>The NDP provides for homes in accordance with its requirement through housing allocations,</p>

	<p>specifically through Policies GDH1a, GDH1b, GDH1c, GDH1d, GDH1e and GDR1</p> <p>Through Policy GDR1, the NDP allocates 1,500sqm of net retail floorspace for convenience shopping within Thame.</p> <p>Policy GDE1 allocates (more than) 3.5 hectares of employment land, reflecting further assessment of local need.</p> <p>Policy GAAT1, GAP1 and Project GAAT(a) give support to development proposals that incorporate improved and extended footpaths and cycle paths where appropriate.</p> <p>Policy NEB1 notes that new development “must manage impacts on biodiversity and secure a minimum net biodiversity gain of 10% on-site, as demonstrated through use of the most up-to-date version of the Natural England biodiversity metric (or any successor document to this) and submission of a biodiversity net gain plan submitted as part of planning application material”.</p> <p>Policy NEC1 stipulates that “any development proposals alongside the Cuttle Brook corridor must ensure that the north-south green corridor through Thame is maintained”.</p> <p>Project NESG(a) supports opportunities to explore how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production.</p> <p>Policy CPQ1 and Policy GDV1 stipulate that proposals need respond to the historic and natural assets of the surrounding area, architecture and style, making use of materials present within the built environment that complement Thame’s character.</p>
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	<p>Policies GDH1, GDE1 and GDE2 require all applications for housing and employment development to be accompanied by a programme of archaeological evaluation to be agreed with Oxfordshire County Council and undertaken in advance of any proposals being determined.</p> <p>Policy SFO1 ensures that proposals for new or improved community facilities, will be supported and should be easily accessible to all.</p>
<p>Policy H3: Housing in the Towns of Henley-on-Thames, Thame and Wallingford</p>	<p>Policy H3 of the Local Plan establishes a requirement for 1,518 new homes to be accommodated in Thame over the period 2011 – 2035, of which it states that there is an outstanding minimum requirement of 339 new homes as of April 2020. However, since the Local Plan was adopted, planning permissions and development have come forward in Thame and which count towards the housing requirement. The updated housing requirement, as presented in the new Joint Local Plan that is being prepared is for 143 new homes over the period 2021 – 2041. The NDP provides for this through its housing allocations, specifically through Policies GDH1a, GDH1b, GDH1c, GDH1d and GDH1e.</p>
<p>Policy EMP6: New Employment Land at Thame</p>	<p>Policy EMP6 of the Local Plan establishes a net requirement for a minimum of 3.5 hectares of employment land to be provided in Thame over the period 2011 – 2035. Evidence prepared alongside TNP2 indicates that a minimum of 5.5 hectares of employment land should be allocated. The NDP provides for this through Policy GDE1.</p>
<p>Policy TC4: Convenience Floorspace Provision in the Market Towns</p>	<p>Policy TC4 of the Local Plan establishes that provision should be made for 1,500sqm of net retail floorspace for convenience shopping within Thame. The NDP provides for this through Policy GDR1.</p>

Local Plan review

- 4.7 The Local Plan is currently being reviewed, with South Oxfordshire and Vale of White Horse District Council's preparing a Joint Local Plan which will cover the period to 2041.
- 4.8 At the time of writing (February 2024) a 'preferred options consultation on a Regulation 18 version Local Plan is underway. It is anticipated that the Joint Local Plan will be submitted in the Spring of 2025 and be adopted by late 2025.
- 4.9 Given the short timeframe envisaged through to adoption it has been considered prudent to consider the submission version of the Thame Neighbourhood Plan against the emerging Joint Local Plan. However, as a preferred options document which also presents alternative policies, it is likely that these will evolve and develop further before the Plan is submitted for examination.
- 4.10 Of specific interest, and whilst Thame is identified as a Tier 1 settlement where new development should be directed, the preferred options plan does not include any site allocations in Thame. It does though establish a strategy for Thame (at Policy SP7). This states that (with commentary on how TNP2 aligns with this presented in inset italics below) a review of the Neighbourhood Plan should:
- Allocate land for at least 143 homes.
 - *TNP2 allocates four sites for new homes and also notes there is potential for homes to be accommodated as part of a mixed-use development of the Cattle Market Site. It also saves 'The Elms' as an allocation from the first Neighbourhood Plan: the site benefits from an extant planning permission for new homes and counts towards commitments included in the calculations of land supply by SODC.*
 - Strengthen the Town Centre, visitor, evening and local retail offer and include opportunities for town centre living.
 - *TNP2 includes policies in respect of the mix of uses that would be welcome in the town centre. It also establishes design principles for town centre development and includes projects that seek to improve the quality of the public realm and which make the centre an attractive place for people to spend time in. TNP2 also includes specific policies in respect of visitor and tourist development. Furthermore, the Cattle Market policy supports opportunities for new retail, residential development and other community uses.*

- Improve the attraction of Thame for visitors and businesses.
 - *TNP2 includes design policies that seek to reinforce the unique and defining features that characterise Thame and which are supported by a Character Area Assessment and Design Guide. It also includes policies and projects in respect of the quality of the public realm and allocates land for new employment.*
- Improve accessibility around Thame.
 - *TNP2 includes a suite of policies and projects that provide for and seek to encourage active travel, including improved infrastructure, bus provision and a network of town wide mobility hubs that provide convenient and sustainable travel choice.*
- Enhance the natural environment and seek opportunities for urban greening whilst conserving heritage assets.
 - *TNP2 seek to maintain and enhance the Cuttle Brook corridor and Nature Reserve, supports delivery of biodiversity net gains, and seeks to direct development away from expanding into the surrounding countryside. It also includes design policies that reinforce heritage assets, with policies for allocations responding to this through the scale and layout of development that respects the setting of the conservation areas and listed buildings.*
- Provide new employment opportunities and improve the quality of the existing employment stock.
 - *TNP2 allocates land for new employment opportunities and also supports proposals for new employment development in Class E that are an appropriate use type in the town centre. It also includes design policies in respect of employment development that support improvements to the quality of development.*
- Provide new or enhance community facilities that meet local need.
 - *TNP2 includes policies in respect of community facilities and design principles for these, including support for flexible buildings that can be used by all and which are easily accessible to all in terms of their location and active travel links.*
- Meet bespoke local needs.
 - *TNP2 is supported by a local housing needs assessment that has informed that approach to the housing type, tenure and mix policy, supporting proposals for development that respond to local needs.*

- 4.11 Based on the above, TNP2 is well aligned and in conformity with both the adopted Local Plan and the preferred approach set out in the emerging Joint Local Plan. This will help ensure that TNP2 has longevity.

5. Sustainability Assessment and Appraisal

Strategic Environment Assessment / Habitats Regulations Assessment

- 5.1 In May 2021 the draft Thame Neighbourhood Plan was screened for the purposes of SEA and HRA by South Oxfordshire District Council in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 5.2 The SEA regulations require the responsible authority (South Oxfordshire District Council) to determine whether or not a plan is likely to have a significant environmental effect and therefore whether SEA is needed.
- 5.3 The SEA screening of the Neighbourhood Plan concluded that the Thame Neighbourhood Development Plan is likely to have a significant effect on the environment and therefore does require a SEA.
- 5.4 At the same time as the SEA screening, May 2021, a Habitats Regulations Assessment (HRA) was prepared for the Thame Neighbourhood Plan, the purpose of which was to determine whether significant effects on a Natura 2000 site could be ruled out on the basis of objective information and best scientific knowledge.
- 5.5 The HRA concluded that The Thame Neighbourhood Development Plan is unlikely to have significant effects on Natura 2000 sites, either alone or in combination with other plans or projects, therefore, an Appropriate Assessment for the Thame Neighbourhood Development Plan Review is not required.
- 5.6 Reports prepared as part of the SEA / HRA process are presented as free-standing appendices to the Basic Conditions Statement. These detail the assessments undertaken, conclusions reached, and how these have been reflected in the Neighbourhood Plan, allocations and policies taken forward in that.

‘Light touch’ Sustainability Appraisal

- 5.8 Even though the need for SEA has been triggered and undertaken for the Neighbourhood Plan, a ‘light touch’ Sustainability Appraisal (SA) proportionate with the Neighbourhood Plan, has also been prepared. This reflects best practice and is based upon the sustainability objectives prepared by South Oxfordshire District Council for the purposes of the Local Plan 2035.
- 5.9 The objectives are listed in Table 6, alongside which commentary is provided indicating how the Thame Neighbourhood Plan responds to these objectives. This demonstrates that the Neighbourhood Plan responds positively to the objectives and will thus help contribute to the delivery of sustainable development in Thame through its blend of policies that will deliver social, economic and environmental benefits.

Table 6: Thame Neighbourhood Plan considered against South Oxfordshire District Council Sustainability Appraisal Objectives

South Oxfordshire SA Objective	Thame Neighbourhood Plan Response
<p>To help to provide existing and future residents with the opportunity to live in a decent home.</p>	<p>Through Policy GDH1, and subsequent Policies GDH1a, GDH1b, GDH1c, GDH1d, GDH1e and GDR1, the Plan allocates several sites for residential development.</p> <p>Policy GDH1 also establishes a wider set of criteria that apply to proposals for development that might come forward on other sites in the Plan area not allocated in the Plan and which might also contribute towards sustainable development.</p> <p>Policy GDH2 stipulates that provision should be made for a mix of housing that meets the needs of the community, based on the most-up-to-date evidence of housing need.</p> <p>Policy CPQ4 supports the provision of self and custom build housing.</p> <p><i>The Neighbourhood Plan is considered to result in a Positive Effect on this SA Objective</i></p>

<p>To help to create safe places for people to use and for businesses to operate, to reduce antisocial behaviour and reduce crime and the fear of crime.</p>	<p>Policies CPQ7, SFO3, GAAT1, GAP1, and GAA1 all support this Sustainability Objective through their support for proposals which facilitate passive surveillance and create safer, more inclusive places for the enjoyment and benefit of all.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To improve accessibility for everyone to health, education, recreation, cultural and community facilities and services.</p>	<p>Policy GDH2 stipulates that where specialist housing is provided, it should be located within easy access of shops, facilities and public transport services.</p> <p>Policy SFO1 ensures that proposals for new or improved community facilities, will be supported and should be easily accessible to all.</p> <p>Policy GAAT1, GAP1, GAPT1 and Project GAAT(a) and GAPT(a) seek to improve town wide connectivity for all.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To maintain and improve people’s health, well-being and community cohesion and support voluntary, community and faith groups</p>	<p>Through Policy SFO1, the Plan seeks to ensure that new community uses are delivered during the early phases of development in order to help build a sense of community and integration with existing surrounding communities. The Policy also insists that proposals that involve the loss of any space or buildings used for community purposes will only be supported where an equivalent replacement for alternative provision is made for that use, and or where the application is supported by material which demonstrates the benefits to the community which outweigh the harm created by loss of that facility.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To reduce harm to the environment by seeking to minimise pollution of all kinds</p>	<p>Policy NEB1 notes that new development “must manage impacts on biodiversity and secure a minimum net biodiversity gain of 10% on-site, as demonstrated through use of the most up-to-date version of the Natural England biodiversity metric (or any successor document to this) and submission of a biodiversity net</p>

	<p>gain plan submitted as part of planning application material”.</p> <p>Project NESG(a) supports opportunities to explore how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production.</p> <p>Policy GAAT1, GAPT1, GAM1 and Project GAAT(a) and GAPT(a) contribute towards minimising pollution by reducing overdependence on cars. This is predominantly achieved by promoting alternatives, be it through the expansion of walking and cycling routes (and facilities), new public transport services or the provision of accessible electric charging points.</p> <p>Policy CPQ5 encourages development applications to demonstrate accordance with Passivhaus standards to help improve building resource efficiencies.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.</p>	<p>Policy GAAT1, GAPT1, GAM1 and Project GAAT(a) and GAPT(a) support the provision of a wider variety of travel choice, and help to reduce overdependence on cars. This is predominantly achieved by promoting alternatives, be it through the expansion of walking and cycling routes (and facilities), new public transport services or the provision of accessible electric charging points.</p> <p><i>The Neighbourhood Plan is considered to result in a Positive Effect on this SA Objective</i></p>
<p>To conserve and enhance biodiversity.</p>	<p>Policy SFO2 identifies a handful of existing open spaces and states that they are “are locations where opportunities for biodiversity net gain are welcomed, this includes via proposals for offsite delivery in circumstances where it is not practical to deliver net gain on site. “</p> <p>Policy NEB1 notes that new development “must manage impacts on biodiversity and secure a minimum</p>

	<p>net biodiversity gain of 10% on-site, as demonstrated through use of the most up-to-date version of the Natural England biodiversity metric (or any successor document to this) and submission of a biodiversity net gain plan submitted as part of planning application material“.</p> <p>Policy NEC1 seeks to ensure that any development alongside the Cuttle Brook corridor should conserve and enhance biodiversity, including potential for connecting habitats and contribute towards biodiversity net gain.</p> <p>Policy NEF1 notes how wherever possible, development should retain, enhance or re-establish watercourses and other surface waterbodies as positive features contributing to the character, sense of place and biodiversity value of development.</p> <p>Meanwhile, through Project NESG(a), the Plan explores how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production.</p> <p><i>The Neighbourhood Plan is considered to result in a Positive Effect on this SA Objective</i></p>
<p>To protect and enhance the District’s open spaces and countryside and in particular, those areas designated for their landscape importance</p>	<p>Housing sites allocated through the Plan, as summarised through Policy GDH1, do not breach the ring road and thus help maintain the compactness of Thame and preserve its surrounding landscape.</p> <p>Policy SFO2 defines areas across Thame as ‘open spaces’ which should be protected and retained in line with the NPPF.</p> <p>Meanwhile, Policy SFO3 sets out a series of good design principles to inform the provision any new green spaces.</p> <p><i>The Neighbourhood Plan is considered to result in a Positive Effect on this SA Objective</i></p>
<p>To protect and enhance the District’s historic</p>	<p>Policy GDH1, GDE1, CPQ1, CPQ2 and GDV1 stipulate that proposals need to respond to the historic and</p>

<p>environment and to ensure that new development is of a high quality design and reinforces local distinctiveness.</p>	<p>natural assets of the surrounding area, architecture and style, making use of materials present within the built environment that complement Thame’s character.</p> <p><i>The Neighbourhood Plan is considered to result in a Positive Effect on this SA Objective</i></p>
<p>To seek to address the causes and effects of climate change by:</p> <ul style="list-style-type: none"> a) securing sustainable building practices which conserve energy, water resources and materials; and b) maximising the proportion of energy generated from renewable sources. c) ensuring that the design and location of new development is resilient to the effects of climate change 	<p>Policy CPQ5 encourages development applications to demonstrate accordance with Passivhaus standards to help improve building resource efficiencies.</p> <p>Policies NEF1 and CPQ8 and Project CPQ(a) seek to ensure that new development is resilient to the effects of climate change.</p> <p>Policy NEF1 requires development to include flood mitigation measures, giving priority to the use of sustainable drainage systems (SuDS).</p> <p>Policy CPQ8 and Project CPQ(a) seek to minimise the risk of surface water flooding through proposals involve the paving over of front gardens.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment.</p>	<p>Policy CPQ8 and Project CPQ(a) seek to ensure that proposals which involve the paving over of front gardens have the minimum impact in terms of surface water runoff.</p> <p>Policy NEF1 insists that where development is proposed in an area at risk of flooding having first satisfied the sequential and exception tests, mitigation</p>

	<p>measures giving priority to the use of sustainable drainage systems (SuDS) must be included.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To seek to minimise waste generation and encourage the re-use of waste through recycling, composting or energy recovery.</p>	<p>Although the NDP does not have a specific policy on waste, it does encourage high standards of sustainability in new development, including for example Passivhaus. It also includes, in Appendix 2, guidance on the design of waste storage within new development.</p> <p><i>The Neighbourhood Plan is considered to result in a Neutral Effect on this SA Objective</i></p>
<p>To improve efficiency in land use and reduce development pressure on the countryside and natural resources / material assets, such as landscape, minerals, biodiversity and soil quality</p>	<p>Housing sites allocated through the Plan, as summarised through Policy GDH1, do not breach the ring road and thus help preserve its surrounding countryside.</p> <p>Policy GAP1 stipulates that where development is proposed adjacent to the Phoenix Trail opportunities should be taken that support improvements to access and use of the Trail, including efforts to enhance the environmental quality of the habitat, biodiversity and trees along the Phoenix Trail.</p> <p>Policy CPQ5 encourages applications for development to demonstrate accordance with Passivhaus standards to help improve building resource efficiencies.</p> <p>Policy CPQ4 sets out requirements for plot passports for self and custom building housing that establish appropriate parameters for development. These will establish the form of development and building parameters for each plot, including building heights, footprint, frontages, density and parking requirements. Meanwhile, Policy CPQ1 establishes a set of criteria which new development is expected to meet, included here is the requirement for development to respond to the immediate context as expressed through plot ratios, scale and massing of development.</p>

	<p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>To ensure high and stable levels of employment and facilitate inward investment within the district</p>	<p>Policy GDR2 seeks to ensure that the loss of shops and related commercial services for the local community will be resisted unless it can be demonstrated that reasonable efforts have been made to secure their continued use for these purposes. Meanwhile, Policy GDE1, GDE2, and GDR1 ensure that sufficient levels of employment development will be provided over the course of the Plan period.</p> <p>Policy CPQ2 and CPQ3 encourage sustainable economic growth by providing a set of principles to inform employment and town centre proposals. These principles help to address the potential barriers to investment, for example by encouraging greater pedestrian connectivity and active frontages.</p> <p><i>The Neighbourhood Plan is considered to result in a Positive Effect on this SA Objective</i></p>
<p>To assist in the development of:</p> <ul style="list-style-type: none"> a) a strong, innovative and knowledge-based economy that delivers high-value-added, sustainable, low-impact activities; and b) small firms, particularly those that maintain and enhance the rural economy. c) thriving economies in 	<p>Policy GDR1 allocates a site for a mixed use development within Thame Town Centre. Meanwhile, Policy GDE1 allocates a site suitable to deliver new employment land development.</p> <p>Policy CPQ2 establishes a set of design principles for employment schemes which seek to stimulate a successful local economy.</p> <p>Policy CPQ3 establishes design principles for town centre proposals, this includes support for the requirement for relevant applications to respect the ability for markets and other outdoor events to operate in the town centre.</p> <p>Policy GDR2 and GDV1 seeks to maintain the viability and vitality of Thame Town Centre by encouraging proposals which protect existing and provide new opportunities for important local services, facilities, and tourist attractions.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>

<p>market towns and villages</p>	
<p>To assist in the development of a skilled workforce to support the long term competitiveness of the district by raising education achievement levels and encouraging the development of the skills needed for everyone to find and remain in work.</p>	<p>South Oxfordshire District Council has through the Local Plan developed Policies to help raise education achievement levels and encourage the development of skills.</p> <p>The Neighbourhood Plan does not include any policies relating to this, instead deferring to national and local plan policies. The Plan however does allocate land for employment, providing opportunities for work in the local area.</p> <p><i>The Neighbourhood Plan is considered to result in a Neutral Effect on this SA Objective</i></p>
<p>To encourage the development of a buoyant, sustainable tourism sector</p>	<p>Policy GDV1 supports proposals for sustainable development that improves the quality and diversity of existing tourist facilities, attractions, infrastructure, and accommodation.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>
<p>Support community involvement in decisions affecting them and enable communities to provide local services and solutions.</p>	<p>South Oxfordshire District Council has through the Local Plan developed policies which support community involvement</p> <p>The Neighbourhood Plan does not include any specific policies relating to this, instead deferring to national and local plan policies.</p> <p>However, it should be noted that the very nature of preparing a Neighbourhood Plan has allowed the community to become involved in the plan-making process and shaping the future of the town.</p> <p><i>The Neighbourhood Plan is considered to result in a Minor Positive Effect on this SA Objective</i></p>

6. Conclusion

- 6.1 The Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Thame Neighbourhood Plan and all the policies therein.
- 6.2 It is therefore respectfully suggested to the Examiner that the Thame Neighbourhood Plan complies with the Basic Conditions, and, subject to any modifications recommended by the Examiner, should proceed to referendum.

Appendix A: Neighbourhood Plan Designation Letter

The determination letter issued by South Oxfordshire District Council in regard to the designation of the Neighbourhood Plan Area is copied overleaf.

Planning Services

HEAD OF SERVICE: Adrian Duffield



Listening Learning Leading

Helen Stewart
Thame Town Council
Town Hall
Thame
OXON OX9 3DP

CONTACT OFFICER: Adrian Duffield
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Benson Lane, Crowmarsh Gifford
Wallingford OX10 8NJ

Dear Helen

DECISION REGARDING DESIGNATION OF THAME NEIGHBOURHOOD AREA UNDER SECTION 61G OF THE TOWN AND COUNTRY PLANNING ACT 1990 AS AMENDED

This letter confirms that South Oxfordshire District Council Cabinet agreed, at a meeting on 12 April 2012, to designate the area shown on Map 1 below as the 'Thame Neighbourhood Area' for the purposes of preparing a Neighbourhood Development Plan by Thame Town Council under section 61G(1) of the Town and Country Planning Act 1990 as amended. It was decided not to designate the area as a business area under section 61H(1) of the Act as it is not primarily or wholly business in nature. The relevant designation information is set out below:

- a) Name of neighbourhood area: Thame
- b) Map of neighbourhood area: see below
- c) Relevant body: Thame Town Council

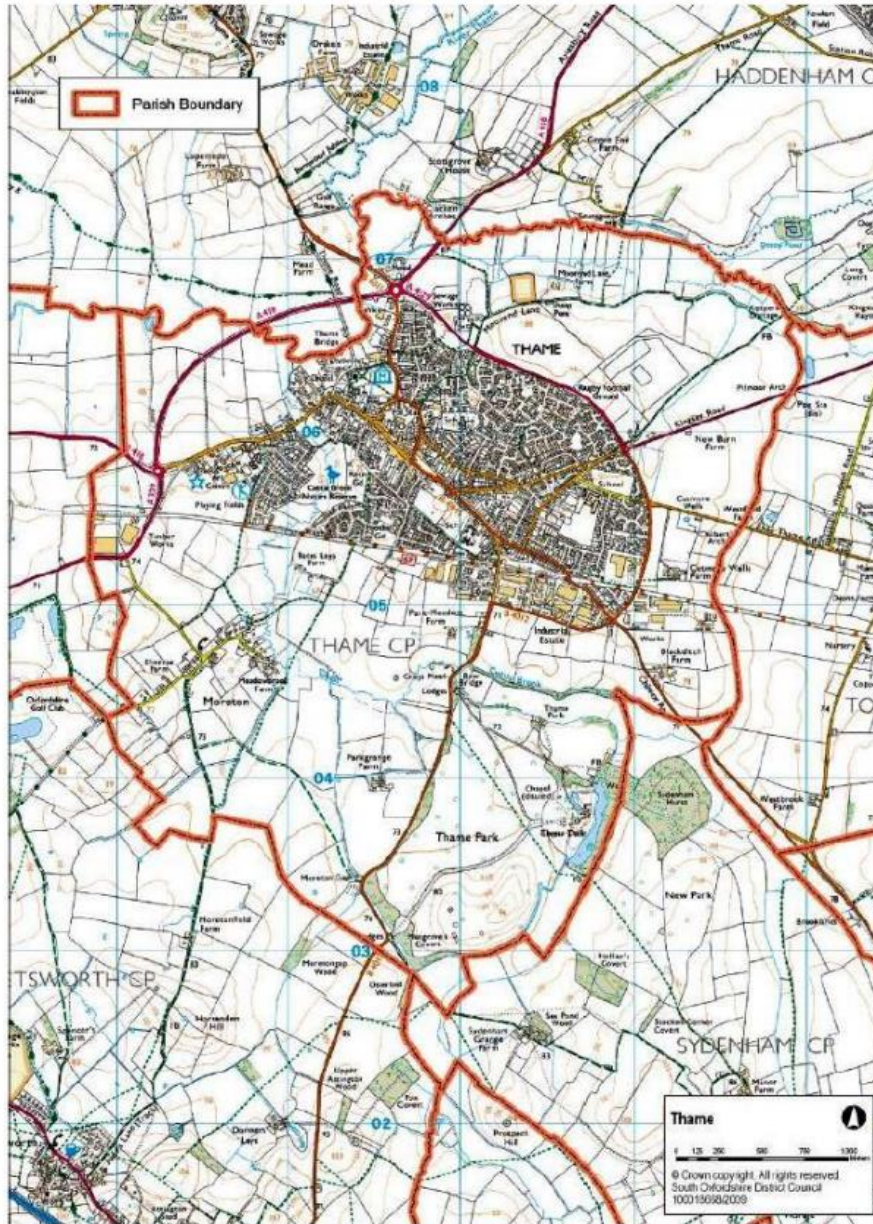
Yours sincerely,

Adrian Duffield
Head of Planning

www.southoxon.gov.uk



Map 1 Thame Neighbourhood Area



Appendix B: SEA / HRA

Reports associated with the SEA and HRA process are presented as free-standing appendices to the Basic Conditions Statement.

Thame Town Council

Thame Neighbourhood Plan (TNP2): 2020 - 2041

Basic Conditions Statement

(Including Area Statement)

March 2024



Thame Town Council

Town Hall

High Street

Thame, OX9 3DP

www.thametowncouncil.gov.uk