

Thame Neighbourhood Development Plan Review

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a distinctive vision for the neighbourhood area. Its presentation is very good. The difference between the policies and the supporting text is clear.

The Plan is impressively underpinned by a package of appendices. The Design Guide and Codes, the Character Area Study and the Masterplanning report have been very influential in the review of the Plan. The package of submission documents is proportionate to the neighbourhood area in general, and to the review of the Plan in particular. In combination the various documents helpfully identify the aspects of the Plan which have been updated.

The Town Council's ambition to review the Plan responds positively to national guidance and associated best practice. The review addresses a balanced range of issues and is underpinned by an appropriate evidence base and research. Moreover, it properly takes account of the adoption of the South Oxfordshire Local Plan.

Process Matters

Section 9 of the Plan advises that both an examination and a referendum are required. I agree with this conclusion and will proceed on that basis.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification with the Town Council and the District Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

Questions and commentary for the Town Council

Policy GDH1

The conclusion which the Town Council has reached in paragraph 4.7 has been challenged by several developers. It would be helpful if the Town Council elaborated on its approach to this matter, and if the submitted Plan is responding to the adopted Local Plan or to the emerging Joint Local Plan Review (or both)?

Is the situation appropriately explained in the District Council's suggested changes to paragraphs 2.4 and 4.7 of the Plan?

I am minded to recommend that the policy is subdivided into its two component parts. Does the Town Council have any comments on this proposition?

Policy GDH1c

I note that planning permission has been granted for the development of this site for housing purposes (P20/S4693/FUL).

I am minded to recommend the inclusion of an additional criterion about the way in which existing natural features on the site are incorporated into the development. This would mirror the approach taken in the determination of the planning application, and would apply to the determination of any further proposals (or amendments to the consented proposal) which may come forward in the Plan period.

Does the Town Council have any comments on this proposition?

Policy GDH1d

The proposed allocation of the site has attracted considerable interest.

The contents of paragraph 4.31 and part 2f part 2g of the policy do not immediately appear to overlap with or explain the details shown on Figure 15. Please can the Town Council elaborate on this matter and what open space would be lost by the development of the site as proposed in the policy?

The 'North-west' parcel of the proposed allocation does not follow any obvious natural or man-made features. Please can the Town Council explain the approach taken.

The representation from Bloor Homes (34) proposes revisions to certain elements of the policy. To what extent has the Town Council engaged with the potential developers of the site to ensure that the development anticipated by the policy can be implemented?

I have raised a separate question later in this note with the District Council about the timetable for the determination of the current planning applications on the site. Plainly drainage and flood risk issue are key outstanding issues. In this context is the Town Council satisfied that the site can be developed as set out in the policy?

Policy GDH2

How would Part 2 work in practical terms?

How would Part 7 work in practical terms? Can a policy establish a priority?

Should Part 8 be applied where it is practicable to do so?

Policy GDR1

Should parts 4, 5 and 7 be the opening elements of the policy? As submitted, the policy's focus reads as an approach towards resisting the loss of car parking on the site rather than promoting its redevelopment.

Is part 6 of the policy too inflexible and could it affect the commercial viability of the package of works necessary to relocate the existing cattle market?

Policy GDR2

I saw the attractiveness of the town centre and its various uses during the visit.

Policies CPQ1 and CPQ3

The two policies are carefully underpinned by the Design Code.

In the round, the policies are an excellent local response to Section 12 of the NPPF.

Policy CPQ6

Should the final section of the policy be worded so that it can be applied proportionately and where appropriate?

In addition, what is meant by 'help facilitate'?

Policy CPQ7

Should third part comment about providing/retaining car parking spaces (which is controllable through the planning process) rather than parking being displaced onto the street (which requires a degree of judgement and would be uncontrollable through the planning process)?

Policy CPQ8

Is the second part of the policy necessary given that the first part of the policy comments about developments which would require planning permission (and can therefore be addressed in a planning policy)? Moreover paragraph 5.46 of the Plan already comments about existing parking standards applied by the County Council on this matter.

Policy SF01

This is a good policy which highlights the importance of community facilities in the neighbourhood area.

Policy SF02

The third part of the policy reads as supporting text rather than as a land use planning policy. Please can the Town Council clarify its intention? Could it be repositioned into the supporting text?

Policy NEC1

This is a good policy which responds positively to the importance of Cuttle Brook.

Policy GAM1

This is an interesting and innovative policy.

Questions for the District Council*Policy GDH1b*

Is the possibility anticipated for a direct access into the site from Wenman Road (in part 2a of the policy) realistic and achievable?

I am happy for the District Council to liaise with the County Council (in its capacity as the highways authority) on this matter.

Policy GHD1d

Is there a timetable for the determination of planning applications P23/S4262/FUL and P22/S2418/FUL?

Representations

Does the Town Council wish to comment on any of the representations made to the Plan?

It would be helpful if the Town Council responded to the representations from:

- The East Thame Residents Association (Representation 12);
- Thames Water (Representation 13);
- Oxfordshire County Council (Representation 21);
- Beechcroft Developments (Representation 13);
- Hallam Land (Representation 29);
- Bloor Homes and Regeneration Thame (Representation 34);
- CALA Homes (Representation 46);
- J M Castle Trust (Representation 47);
- Stopford Properties Limited (Representation 51); and
- Rectory Homes (Representation 52).

The District Council (Representation 42) suggests a series of revisions to some of the policies and parts of the general text in the Plan. It would be helpful if the Town Council responded to the various issues raised.

Protocol for responses

I would be grateful for responses and the information requested by 16 September 2024. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please could it come to me directly from the District Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

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16 August 2024