

Thame Neighbourhood Plan

Summary of representations submitted by South Oxfordshire District Council to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Name	Summary of representation
Lucy Murfett for South Oxfordshire District Council	The plan is in conformity with EU, national and local strategic policy. However, South Oxfordshire District Council remains concerned about the 'up to 45' figure for the allocation at the Elms.
Amanda Jacobs for Oxfordshire County Council	<p>Sustainability Appraisal and evidence base – OCC are not aware of any ecological assessments on site B and 2 parts of site C. There is no record of ecological constraints at these locations but it is possible they have gone unrecorded.</p> <p>Delivery Strategy – Appendix A – this document replicates SODC's Infrastructure Delivery Plan which has not been updated since SODC's EIP. This document needs updating. This should be updated before the plan is adopted.</p> <p>Supports the allocation of Lord Williams Lower School site for 135 dwellings.</p> <p>The plan makes no reference to the archaeological heritage of Thame. The NPPF requires plans to protect or enhance the historic environment.</p> <p>Page 2 of the Delivery Strategy section references CIL as a tool for the delivery of infrastructure. It is unknown if SODC will be adopting this. This could pose a risk if CIL is not adopted and no other channels of funding are identified.</p> <p>Policy 7B-P4 and 12A-P1 state that developers will only be expected to deliver on-site infrastructure and provide financial contributions to off-site work. There is no reason why developers wouldn't be expected to deliver off-site projects.</p> <p>Policy 9B-P1 – by promising infrastructure to be developed through a Thame Green Living plan, the plan potentially over-promises infrastructure development that could be difficult to deliver.</p> <p>Policy 9C-P1 – OCC is not able to commit resources to a cycle link to Haddenham and Thame Parkway. The plan needs to demonstrate how this project will be delivered. Funding for this would have to come entirely from developer contributions.</p> <p>OCC should be included on page 1, bullet 4 of the Delivery Strategy.</p>
Martin Small for English Heritage	<p>Disappointed to see that preserving and enhancing the historic nature of Thame is not set out in the Vision of the document.</p> <p>Supports policies 11H-P1, P2, P3, P4 and P6. English Heritage would like to see specific policies which enhance the character of conservation areas, listed buildings, Thame Park and any locally important heritage features.</p> <p>Objecting to the allocation of homes at the Elms. The site is particularly sensitive and this view has been expressed to the Town Council. Development can occur on site but it should be limited and not infringe on areas to the eastern and south-eastern areas of the site.</p>
Vicky Aston for Sport England	Sport England object to the prospect of the Cattle Market site being exclusively convenience goods and hence support the plan.
Jack Moeran for the Environment	Welcome the commitment to reduce the flooding problem in the town. However, objective 11F should be reworded to exclude all development

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Agency	<p>on flood zones 2 and 3. It is noted that development will not occur within 100 meters of the banks of the river.</p> <p>The Environment Agency will not comment on surface water drainage schemes for sites of less than 5 hectares – please reword policy 11F-P2 to reflect this.</p> <p>Welcome the commitment to the Cuttle Brook Nature Reserve but would like to see policy 11G-P2 strengthened to seek developer contributions for the enhancement of waterways.</p> <p>The provision of a cemetery at sites C and D must observe Environment Agency regulations.</p>
C Bell for Thames Water	<p>Sites C, D and F, and Lord Williams Lower School will require developer funding for capacity investigations to identify the exact needs of development. It is likely these developments will require upgrades to pumping stations. Upgrades to the network for site F will be less than those for the other sites. The inclusion of policies 11F and 11F P2 are welcomed.</p>
John Moran for HSE	<p>The employment allocation at Site B could be effected by the middle and outer zones associated with BOC limited. Any planning applications on this site should consult with the HSE through PADHI+.</p>
Sarah Armstrong-Stacey for Natural England	<p>Satisfied by the policies set out in the plan.</p>
Angela Atkinson for Marine Management Agency	<p>No Comment</p>
Rachael Bust for the Coal Authority	<p>No Comment</p>
Morgan for Network Rail	<p>No Comment</p>
David Broadley for Aylesbury Vale District Council	<p>Development on Site F and reserve Site F would have an unacceptably harmful impact on the landscape character to the land north of the A418.</p> <p>There was a lack of a Landscape and Visual Impact Assessment to inform the capacity of Site F.</p> <p>There is no commitment to work with AVDC or Buckinghamshire County Council with regards to the A418 roundabout to the North of the Thame.</p> <p>The Sustainability Appraisal is flawed.</p>
Patricia Pointer for Oakley Parish Council	<p>Please consider the impact on parking of 775 new homes.</p>
Roger Williams for Brill Parish Council	<p>The plan is not consistent with SODC's Core Strategy on issues relating to car parking. The plan needs to assess parking needs, preserve current parking provision and aim to increase this.</p>
R.G Williams for Thame Farmers Auction Mart	<p>The Cattle Market site needs to be relocated to the showground site. The current site is suitable for a supermarket.</p>
Malcolm Gerrard	<p>The Cattle Market site should provide a supermarket.</p>
Richard Carver	<p>The Cattle Market site needs a supermarket. The proposal for small units and cafes will not create footfall for Thame's town centre.</p>
Nigel Preston	<p>The Cattle Market site needs a supermarket to maintain town centre footfall and prevent out of town supermarkets having the opposite effect.</p>
Patrick Cannon	<p>Welcome the idea of a Sainsburys store in the Cattle Market site.</p>
Neil Dury	<p>The plan should not exclude a supermarket on the Cattle Market site.</p>

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Gavin Compton	The plan should not exclude a supermarket on the Cattle Market site as there is currently not enough supermarket variety in the town.
Susan Bell	Wishes to see a supermarket allocation (by Sainsbury's) on the Cattle Market.
Andrew Burternshaw	Objecting to the exclusion of a supermarket on the Cattle Market site.
C.B Cranshaw	The plan needs to ensure there is sufficient parking provision in the town centre to accommodate the new housing. New housing sites need to ensure sufficient off-street parking as outlined in Local Plan Policy D2
Brian Dover	The proposed footpath to the east of the allotments should run on the outside of the site.
Peter McDermott	Opposition to the allocation at the Elms – this site is best used for open space as the traffic would have a large impact on nearby roads. Opposition to moving Lord Williams Lower School – relocation would have negative traffic impacts. This site should be used for open space. Site F should have a larger allocation. Site C and D have too many dwellings allocated to them.
Nick Marriner	The consultation process with residents and key statutory bodies has been poor and not transparent. The Elms site is not capable of taking the numbers allocated in the plan – the process for calculating this number is flawed.
Oliver Dyroff	The consultation process was flawed. Closed meetings were held and not all interest groups were consulted.
Paul Earley	<p>The consultation process was flawed when looking at preferred options. Only residents' groups were able to attend meetings and the general public were excluded from meetings. The reasons for selecting the preferred option are not credible. The plan should not go to referendum.</p> <p>The consultation event held in May and June 2012 were used as a mandate to continue with the formulation of the plan despite no evaluation of the evidence being published by Thame Town Council. They appear to have been disregarded.</p> <p>Publicity of consultation events by Thame Town Council was inadequate. Normal channels of communication between the Town Council and the residents were under utilised. There was very little effort to draw attention to the proposals of the plan.</p> <p>The plan doesn't comply with the core strategy policies CSM1 and CSTHA2. The housing allocations are not sustainable as they do not encourage walking or cycling to the town centre.</p> <p>There is insufficient parking provision within the plan despite the fact that it identifies this as a challenge to the town. The lack of such allocations means that the plan fails to meet its own policy 9E and policy CSM1 of the South Oxfordshire Core Strategy.</p>
Claire Forest	<p>The preferred option was not a result of initial rounds of public consultation and evolved from closed meetings. The preferred options consultation stage was heavily weighted towards groups at the West of Thame.</p> <p>Site C was not open to public consultation and was calculated solely by residents groups and town councillors.</p> <p>Site C scores poorly against the objectives of the plan.</p> <p>The display of documents on Thame Town Council's website was confusing and not user friendly.</p> <p>The consultation between August and October 2012 received an alarmingly low response.</p>
Chris Williams	The evidence base supporting the preferred options is flawed.

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	<p>The preferred options ignore key issues raised by resident consultation events.</p> <p>The preferred option was not a result of initial rounds of public consultation and evolved from closed meetings.</p> <p>Consultation with the public has been poor.</p> <p>Thame Town Council meetings have not been transparent.</p> <p>It was difficult to respond to draft copies of the plan.</p> <p>The consultation stage did not engage key interest groups with sound knowledge of the town.</p> <p>There has been no justification made for the allocation of homes at the Elms.</p>
Kath Daly	<p>The consultation process is flawed. The plan fails to take proper account of the evidence base and lacks consistency with the stated objectives and priorities resulting from public consultations.</p>
Barry Yates for Oxford Road Residents Association	<p>The consultation response has been significant and the distribution methodology for development sites is approved.</p>
Robert Linnell for Regeneration Thame	<ol style="list-style-type: none"> 1) Relocate allocations from site C to reserve site F as a more sustainable location. 2) Make Site C a reserve site in its entirety. 3) Rectify density calculations, limit what is defined as publicly accessible open space and provide flexibility in the design and layout of sites.
Andy Birch for Hallam Land Management Ltd	<p>Objecting to the allocations at Site C and D. The plan is not in conformity with the NPPF, the South Oxfordshire Core Strategy, it does not contribute to the achievement of sustainable development, and does not accord with EU obligations in respect of SA requirements.</p>
Simon Gammage for Banner Homes	<p>Object to the allocation of Site C for 187 homes under Policy A2.</p>
	<p>Policy 7B-P1 – Support the principle that all new development should be well connected to the town centre. The removal of Site C for housing and the enlargement of Site D would meet this aim.</p>
	<p>Supports the requirement for 40% of affordable housing on new development.</p>
	<p>Object to the tone of the document which hints at a 3ha cap on employment land allocation. A cap would be inconsistent with the core strategy and the NPPF.</p>
	<p>Site B is not a sustainable location and is not easily accessible from the town centre. Site C would be a better location for such uses.</p>
	<p>Supports policy 9B-P1 to deliver improved pedestrian and cycle connections</p>
	<p>Supports policy 9E-P1 as it will reduce car parking pressures on Thame and encourage sustainable modes of transportation.</p>
	<p>Objection to the allocation of Site C for housing development. Site C is not in line with the 'walkable Thame' principle. Site D is a more sustainable site for residential development.</p>
	<p>Supports Policy A3- which identifies site D for housing allocation but believes the site should be extended.</p>
	<p>If Site C and F remain the principle sites for housing development in the Town, then reserve sites C and F should be removed from the plan. Site D should be extended to accommodate the loss of a reserve as these could be brought forward independently of the failing sites.</p>
<p>Appendices of information supporting the representations submitted above.</p>	

Name	Summary of representation
Adam Ross, Broadway Malyan for CEG	Support policies 11H-P1 to 11H-P15 as a mechanism to ensure high quality development.
	Support paragraph 11 in that it does not require developers to provide full public access to all areas of open space.
	Support section 3 paragraph 1 as it can be interpreted as indicative through the supplementary text, drawings and site areas.
	Support the housing distribution methodology across the sites in Thame.
	Support the allocation of Reserve Site C in the event of Lord Williams Lower School not coming forward. Support Figure A14 as it can be interpreted as indicative through the supplementary text, drawings and site areas.
	Support policy A3 allocating site D for housing development. Support paragraph A3.11 as it can be interpreted as indicative through the supplementary text, drawings and site areas.
	Support policy A2 which allocates site C for housing development. Support paragraph A2.10 as it can be interpreted as indicative through the supplementary text, drawings and site areas.
	Support the principal of developer provisions of new community facilities both on site and off site, through financial contributions.
	Support the policies set out in the character and quality section (policies 11H-P1 to 11H-P15).
	Support Policy 7A-P1 and consider it to be in conformity with South Oxfordshire District Council's core strategy and the NPPF
	Support the sustainability appraisal and refer to the comments made by the local plan inspector in 2004 regarding the connectivity of site C.
	Support the requirement that all new housing is of a high quality design.
	Support the requirement that all new development which results in a net gain of 3 or more dwellings will require affordable housing provisions as set out in the core strategy policy CSH3
	Support the requirement that new development provides the right mix of housing types and size.
	Consider the wording of policy 7D-P2 to be overly prescriptive. The Dwelling Mix Strategy should not be essential to outline planning permission; it should be an attached condition to consent.
	Support the concept that new development should provide good pedestrian and cycle connections to the town centre.
Support the concept of a burial site on site C.	
Support the requirement to incorporate SUDS.	
Lorraine Kelly, Peacock and Smith for Wm Morrison Supermarkets Plc	Policies 8A-P3; 8A-P4 and 8A-P5 are supported because they would allow for small convenience shops in the town centre.
Robert Posselt for Martin Robeson	Objective 8A – The plan should not be worded as to ‘resist’ out of centre shops. It should instead make reference to the sequential and impact tests as set out in the NPPF when applications for out of centre schemes are assessed.
	Objective 8C and Policy 8C-P1 – the long term retention of land for employment purposes is not consistent with the NPPF. A flexible approach to the release of employment land for other purposes should be included.
Nick Jenkins, Turley Associates	The exclusion of convenience retail on the cattle market site will make the site unsustainable and the plan is therefore not in conformity with

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for Sainsbury's Supermarkets Ltd	<p>the NPPF and the core strategy. The site should be a mix of comparison and convenience. The plan seems to ignore the demand for the mix as raised in the consultation stages.</p> <p>Policy 8D-P2 is too prescriptive. It is not the role of a neighbourhood plan to be so descriptive. The level of detail could prejudice alternative options and prevent development from coming forward.</p>
J.M. Castle for the Castle Trust	<p>The plan does not meet the basic conditions. It is not in conformity with the Core Strategy or the NPPF.</p> <p>Site 16 should replace site B for employment purposes.</p>
Mark Sitch, Barton Willmore for Stoford Properties Ltd	<p>Objection to policy 8B. Support the allocation of site B but object to the exclusion of B8 uses on site.</p>
Daniel Gallagher for Stoford Properties	<p>Support site B for employment use as a suitable, achievable and developable site.</p>