



THAME
Town Council

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13/09/2024

Re: Clarification Note – Thame NDP

Dear Edward

**Thame Neighbourhood Plan 2
Response to Clarification Questions**

Thank you for providing Thame Town Council with a copy of the clarification questions posed by the Examiner. We are now pleased to provide our answers to these. For ease of reference, these follow the order in which the clarifications are posed.

Please could you forward to the Examiner on behalf of the Town Council, making clear that the Town Council is very happy to assist the Examiner (with these and any other questions that may emerge), and to express our gratitude for the providing the opportunity to respond to representations.

Yours sincerely

Graeme Markland
Neighbourhood Plan Continuity Officer

[A] Questions 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?

Town Council response:

1. The general conformity test set out in the Basic Conditions is against the adopted Local Plan, and it is the strategic policies within this that provide the starting point for the Neighbourhood Plan.
2. Unlike other strategic policies however, housing supply and requirements are not static. Development that has come forward since the Local Plan was adopted counts toward the requirements for Thame. Through work on the Neighbourhood Plan, ongoing monitoring undertaken by the Town Council and in discussion with the District Council (SODC) confirmed that completions since adoption of the Local Plan have reduced the housing requirement for Thame. This is reflected in the Neighbourhood Plan.
3. Publication of a new draft Local Plan confirms that the housing requirement for Thame has reduced as a result of completions and other commitments. Irrespective of whether a new Local Plan was being prepared, the outcome of the monitoring process remains the same: that the outstanding housing requirement has reduced. It is to be noted that SODC, with the Vale of White Horse, produced a Joint Housing Needs Assessment in November 2023 and the draft Local Plan reflects this position, identifying the housing need and sites required to deliver that, and thus represents the up-to-date position. Policy HOU2 of the draft Local Plan states that the outstanding commitment for the Thame Neighbourhood Plan is 143 homes.
4. The Town Council notes that although the test of the Basic Conditions is not against emerging Local Plan policy, [Planning Practice Guidance](#) (Para 009, Ref ID: 41-009-20190509) advises that "*the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested*". Planning Practice Guidance cites up-to-date housing evidence as being relevant to housing supply policies in a Neighbourhood Plan and the achievement of sustainable development. In this respect, the Thame Neighbourhood Plan thus accords with the Basic Conditions and national guidance in respect of the emerging Local Plan.
5. It is noted that some of the representations make the point that the housing requirement for Thame set out in the Local Plan is a minimum and that the Neighbourhood Plan should plan for more than this. It does:

- a. The allocated housing sites (excluding Land south of Wenman Road and at The Elms as these are recorded in commitments) are envisaged to have potential for approximately 155 homes, as opposed to the requirement for 143 homes.
 - b. The reference to 'approximately' allows for the development potential of each of the sites to be tested in more detail at the planning application stage and which may allow for additional housing where appropriate to context and satisfying design criteria for the site(s). Indeed, it is understood that the potential for development of Land at Oxford Road may be greater than set out in the Neighbourhood Plan given the views of SODC policy officers in response to the application stating that the scheme should come forward at a higher density as set out in Policy STRAT5 of the adopted Local Plan.
 - c. The allocation of the Cattle Market is expected to include homes as part of the mix of development that comes forward on the site. Although a housing figure is not stipulated in the Neighbourhood Plan, providing flexibility within the design and development process, any housing that is delivered will contribute towards meeting housing requirements. The HELAA undertaken by SODC as part of the new draft Local Plan notes the potential for development could be as high as 45 homes.
 - d. As noted in para 4.16 of the Neighbourhood Plan, there has been consistent delivery of smaller windfall sites across Thame and although not relied upon in the Neighbourhood Plan to meet the housing requirements for Thame, this pattern is expected to continue. Indeed, there is one site in Thame currently under construction for 21 homes and a second, larger scheme, where the principle of residential development has been established by SODC, now subject to planning. Parts 1 – 8 of Policy GDH1 in the Neighbourhood Plan enable this by allowing proposals to come forward on unallocated sites (and where they satisfy those criteria).
6. The Neighbourhood Plan thus meets the 'minimum figure' as required but also allows for development over and above this. The approach taken is considered to meet the basic conditions whilst also reflecting the aims and objectives for Thame as tested through consultation, the supporting evidence, assessments and other material prepared as part of the plan-making process.
 7. The position expressed in the Neighbourhood Plan has been agreed with SODC. It is acknowledged that wording in the Neighbourhood Plan could though be expressed more clearly to explain this and, to that extent, it is noted that in their Regulation 16 response, SODC confirms their agreement to the position taken and suggests an alternative form of wording to clarify this (see Comment reference 2 in their response). In summary, and in response to the second part of the clarification question, the Town Council agrees that the text suggested by SODC provides that clarity and is happy for this form of wording to be reflected in modifications to the Neighbourhood Plan.
 8. The Town Council is happy for the Examiner to propose subdividing the policy into its component parts. The Town Council assumes that Parts 1 to 8 of the Policy would comprise the first of these, applying to all housing proposals, whilst parts 9 to 11

would form the second, applying to the housing allocations in the Plan, and that these would be titled accordingly.

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?

Town Council response:

1. The Town Council is happy for the Examiner to propose modifications to the Neighbourhood Plan along the lines suggested.

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?

Town Council response:

1. The response to this set of questions includes a series of sub-headings to help provide clarity, indicating which part of the clarification question is being responded to:

Para 4.31 and Parts 2f and 2g of the Policy

2. The sequence of images presented below have been provided to help visualise what is meant by the 'land swaps' envisaged in the Neighbourhood Plan:
 - a. All show the entire extent of the land allocated in the first Neighbourhood Plan and carried forward through the review of this. Land now built out for housing (Thame Meadows) is highlighted.
 - b. The first of the plans shows three additional areas allocated for development in the first Neighbourhood Plan, including land for a school / school expansion, and a reserve site for housing. None of these have come forward.
 - c. The second of the plans introduces the housing development areas identified in the new Neighbourhood Plan and the areas they are replacing from the first Neighbourhood Plan.
 - d. The third simply shows the Thame Meadows area with the new housing allocation areas adjacent to these.
3. The images are intended to help show that there is no overall loss of open space envisaged through allocation of land at Oxford Road in the Neighbourhood Plan, rather that proposed areas of development in the first Neighbourhood Plan are relocated to different parts of the overall site. The sites allocated in the new Neighbourhood Plan are expected to provide open space in line with standards set out in the Local Plan. The masterplan documents shows how this might be achieved through provision of play areas, landscaping and similar within the development areas. In addition to this, and as per the first Neighbourhood Plan, there is a requirement to provide permissive footpaths across the site as well as areas of unrestricted public access.

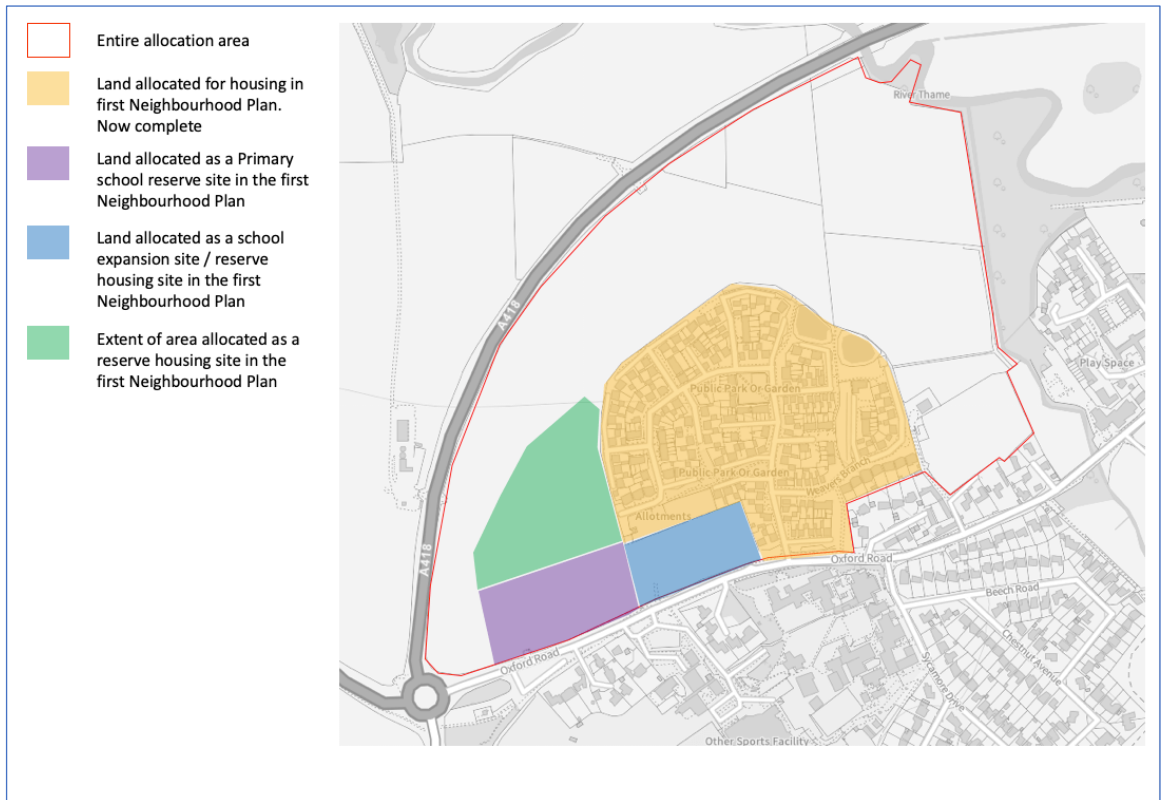


Figure 1: Overall allocation area in the first Neighbourhood Plan and areas within this where it was identified that development could take place

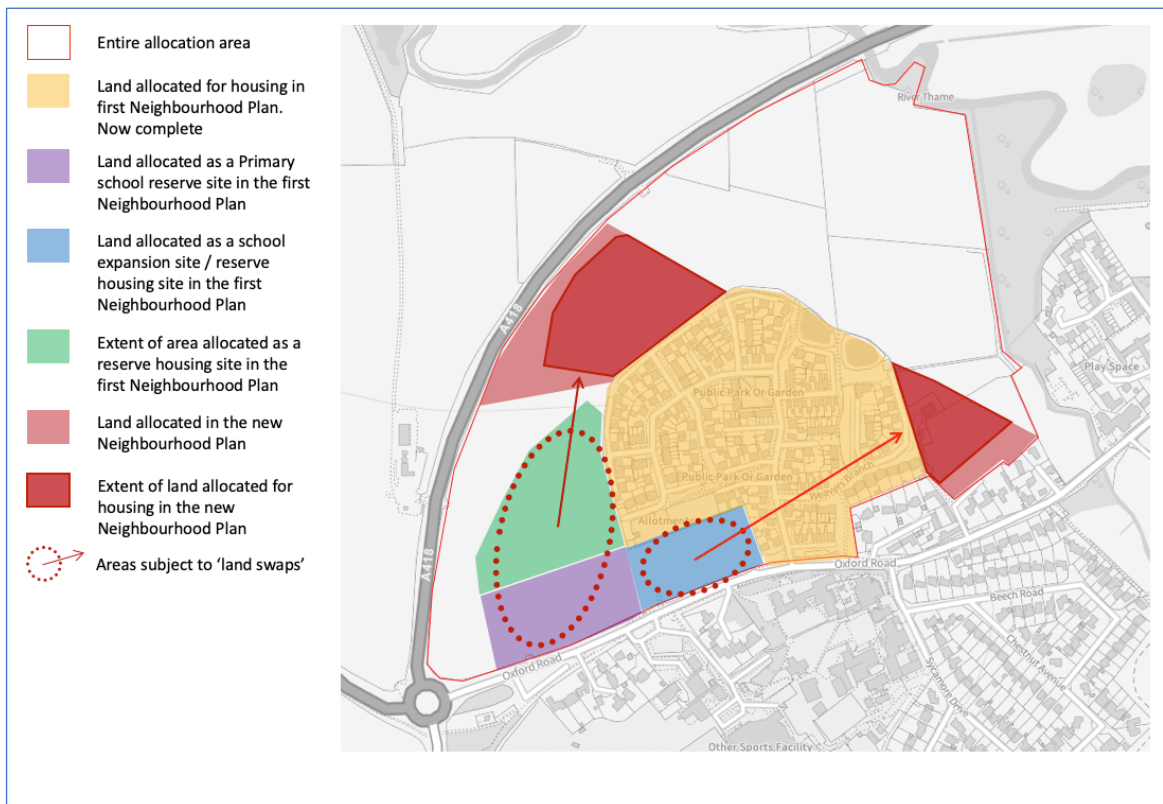


Figure 2: Plan showing proposed relocation of development areas (i.e.: land swaps) between the first and revised Neighbourhood Plans



Figure 3: Plan showing the extent of the Thame Meadows development area and new areas allocated for housing in the new Neighbourhood Plan

The 'North-west' parcel

4. The boundary of the parcel responds to a variety of factors including:
 - a. The requirement for a noise-related buffer alongside the A418.
 - b. The extent of the flood plain, including evidence provided by the applicant on the extent of the existing and future, climate-change driven area of flood risk.
 - c. The need to avoid encroachment of the physical remains and landscape setting of the area of archaeological interest.

Engagement with Bloor Homes

5. The Town Council has engaged with the applicant (and their agent) on a regular basis since the site was first promoted as a potential allocation, including through preparation of the Neighbourhood Plan and subsequent planning application process. This has allowed for a shared understanding of the site constraints and development potential.
6. The Policy (and associated concept masterplan) in the Neighbourhood Plan respond to those discussions, evidence presented, reported preapplication discussions and stakeholder responses, including those received in response to the Regulation 14 consultation on the Neighbourhood Plan. Some discussions have taken place since the Neighbourhood Plan was submitted, and further stakeholder responses received to the application, and it is acknowledged that there will be some changes to the final proposed scheme before it is approved. The Policy in the Neighbourhood Plan

recognises this: the housing figures in the Neighbourhood Plan are for example stated as 'approximate' and the wider criteria state that proposals should take the 'indicative concept' masterplan into consideration. This allows for some degree of flexibility (and also certainty) within the planning application process.

7. In terms of the revisions proposed by Bloor (wider comments in respect of the Neighbourhood Plan are addressed in Section C of this response):

Comments on the allocation of land at Oxford Road

- a. The response suggests that Part 2b of Policy GDH1d should be revised to allow for a higher density development. Reference in the Policy to the density of development being consistent with the adjacent Thame Meadows scheme is to respond positively to that scheme and landscape matters. The masterplan report notes that based on assessment of local character, landscape and heritage features, a lower density scheme than set out in Policy STRAT5 would be more responsive to the built and landscape setting of the area, and reflects feedback from SODC at the Regulation 14 stage. Policy STRAT5 establishes a density of 45 homes per hectare as start point. It acknowledges that this will be further refined and informed by analysis of the site, including character, setting and constraints. This is further elaborated upon in paragraph 3.54 of the Local Plan. The approach taken through the masterplanning work and expressed in the Neighbourhood Plan policy is thus consistent with the Local Plan. However, the Neighbourhood Plan does not constrain the density of the proposed development. Responding to the setting is important but a well-designed solution can deliver higher densities that are not incompatible with the site and surrounds. It will be for the applicant to justify this through the application material as required in Local Plan policy STRAT5.
- b. The response suggests that an updated masterplan should be included in the Neighbourhood Plan. Thame Town Council is happy to consider this, but only in so far as it has the approval of SODC, as confirmed by SODC. Inclusion of a masterplan is important to understanding the scale and form of potential development and engender positive discussion with the applicant and decision makers.
- c. The Town Council notes comments in respect of open space and publicly accessible open space and is happy to consider alternative wording. The following is suggested (where underlined text is new text):

Part 2f: There should be no net loss in the quantum of publicly accessible open space across the allocation. Where possible, land provided as open space or publicly accessible open space for the existing Thame Meadows development shall be retained and integrated into the network of green infrastructure to be provided as part of new development.

Part 2g: New areas of public or publicly accessible open space, of at least equal size and quality to any existing open space lost as a result of development, must be provided in an equally accessible location as part of the development. Where land is to be provided as open space this should not be located where users would be subject to unacceptable noise levels.

[Part 2h: no change]

Part 2i: Land subject to archaeological interest shall be retained as open space, publicly accessible open space or community open space use that would not harm the area of interest or its interpretation.

- d. Comments suggest that the Neighbourhood Plan should reflect the ability to deliver biodiversity net gain off site. On site gains are preferred in line with the Environment Act but the Plan does recognise that this may not be practicable and thus off-site gains should be provided. The aspiration in the Plan is that these are provided as close as possible to the application site. The Town Council has suggested an alternative form of wording for Policy NEB1. This is presented in Section C in response to comments made by SODC and is not repeated here.

Comments on the Oxford Road concept Master Plan:

- a. The design principles for this allocation are those explored through the masterplan process and represent both the spatial interpretation of Policy GDH1d and the wider vision and objectives of the Neighbourhood Plan.
- b. The response suggests that some amendments should be made based on a conversation and 'verbal agreement' with the landscape officer. The Town Council cannot of course make any amendments based on a conversation it was not party to.
- c. However, the concept diagrams within the masterplan are acknowledged as indicative and are presented to assist in the positive preparation of planning applications, but that through the detailed masterplanning and planning application process, elements are likely to change and vary from the masterplan illustrated in the Neighbourhood Plan.
- d. The locally important views identified in the masterplan are based on comments received from SODC in response to the Regulation 14 version of the Neighbourhood Plan which clearly stated that:

"The policy should include wording to ensure that a wide-open corridor is maintained adjacent to the Cuttle Brook, to retain the visual link in views from Oxford Road to the countryside to the north and that this is not blocked by new housing and new planting. The proposals shown in figure 11 would block this visual corridor. It should also highlight the importance of the corridor, as defined on figure 20, not just the Brook itself, and highlight potential landscape impact to the north."

Drainage and flood risk

8. Yes, the Town Council is satisfied that the site can be developed as envisaged in the Neighbourhood Plan.
9. It is understood that since the Neighbourhood Plan was submitted ongoing meetings between the applicant and SODC have been taking place. The Town Council notes from correspondence between the SODC, applicant and other stakeholders that further work is being undertaken to help address comments in respect of matters including flooding and drainage.

10. In terms of flood risk, it is understood from the applicant that a revised Flood Risk Assessment has been prepared based on discussion with the Environment Agency and use of their data sets. The extent of the developable area proposed within the application is outside of the area of flood risk. In addition, the application also proposes an integrated SUDs system that will help manage storm water and drainage.

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?

Town Council response:

1. The policy and supporting text in the Neighbourhood Plan has been informed by the findings and recommendations of the Housing Needs Assessment prepared by Aecom through the Locality Technical Support programme.
2. The Town Council notes that although SODC comments on and suggests modifications to the policy text, it is happy with Parts 2, 7 and 8 (albeit that SODC employs a different numbering system) and recommends no change to these.
3. However, the Town Council does, on reflection, acknowledge the issue of how Part 2 might work in practical terms, and that this has been raised by other Regulation 16 respondents. The Town Council suggests that wording is changed to encourage delivery of affordable rented tenures in the early years of the Plan rather than saying this ought to happen, as implied by the current text. It is thus suggested that the sentence be rephrased along the lines of *'As far as possible and as appropriate to the site and overall phasing, the delivery of afforded rented tenures should be prioritised in the early years of the Plan period'*. Based on the rationale for the recommendations set out in the Housing Needs Assessment, it is suggested that the 'early years' of the Plan are defined in the supporting text to be the first five years of the Plan following adoption ('making') of the Plan. The Town Council is though happy to be guided by the Examiner.
4. In terms of Part 7, the policy includes the word 'should' rather than 'must', and thus does not require the provision of flats, though does signal support for this. The Town Council is happy to consider alternative wording as guided by the Examiner that might soften the wording though still indicate support for flats as identified through the Housing Needs Assessment. It is suggested that this part of the policy might be rephrased along the lines of *'Where small homes are to be provided, encouragement is given to incorporation of flats as part of the overall mix of homes'*.
5. In terms of Part 8, yes, it should be applied where 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?

Town Council response:

1. The public interest in this site, as expressed through consultation, is considerable. Whilst acknowledging that the site has potential for development, as established through the first Neighbourhood Plan, the ordering of the policy reflects the scale of interest in the site and important role it plays in terms of Town Centre parking. The wording in the Policy makes clear that locally expressed priorities and needs are reflected in it.
2. In respect of para 4, it is noted that the overall response from SODC suggests that reference to use classes is removed but that the Property Team (who are responsible for delivering the scheme) are happy for these to be retained, although suggest some softening of the wording. The Town Council would prefer for the wording in para 4 as expressed in the submitted version of the Neighbourhood Plan to remain, responding to wider consultation feedback and aspirations for the site. Indeed, the current form of wording does not preclude alternative uses from being accommodated.
3. In respect of Part 6, the Town Council notes that the response from SODC recommends that not only should this text be retained but that it becomes new Part 1 of the policy. This recognises the importance of the Cattle Market to the role and function of Thame. It is also noted that the comments from the SODC Property Team do not raise issue with respect of Part 6. In terms of the Racquets club, Local Plan Policy CF4 would be applied in any event. The response from the SODC Property Team suggests that this clause should only apply if the club is 'still located and operational on the site at the time of a planning application being submitted'. The Town Council is happy for this or similar wording to be reflected in an update to the policy.

Policy GDR2

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

Town Council response:

1. The Town Council notes the comments, and that no response is needed.

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.

Town Council response:

1. The Town Council notes and welcomes the comments, and that no response is needed.

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'?

Town Council response:

1. Yes, it is the intention that the final section of the policy is applied proportionately where appropriate. The Town Council suggest that the words '*As appropriate to their scale and location*' are added to the start of the sentence. Equally, the Town Council is happy to be guided by the Examiner as to an appropriate form of wording to be used.
2. By 'help facilitate', the Town Council is keen that proposals for change do not preclude (by virtue of the layout or structure of development for example) future opportunities for improvements being made to the walking and cycling network as emerging through the LCWIP, and/or, that development proposals integrate walking and cycling improvements as suggested in the LCWIP. The Town Council notes that SODC has suggested that the words '*are encouraged to help facilitate*' are added to the policy text. An alternative form of wording might be '*should have regard to and, as appropriate, incorporate infrastructure improvements....*'. The Town Council is happy for the Examiner to suggest an appropriate form of wording to clarify this part of the policy.

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)?

Town Council response:

1. The Town Council believes the Examiner is suggesting that the emphasis of the policy should be switched around but that application of it would have the same effect. If this is the case then the Town Council is happy to be guided by the Examiner as to appropriate wording that should be used.

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.

Town Council response:

1. The second part of the Policy appears because there may be instances where planning permission is not required for the paving over of a front garden, but it is required for installation of a dropped kerb. The second part of the policy thus acts as a 'safety net' and seeks to influence the nature of any changes such that they are, as far as possible, sensitive to the character of the street and impact on localised flood risk.

Policy SF01

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

Town Council response:

1. The Town Council notes and welcomes the comments, and that no response is needed.

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?

Town Council response:

1. This part of the Policy is closely linked to Policy NEB1 (Biodiversity). The Town Council recognises that although the start point is for biodiversity net gain to be provided on site this might not be possible, and thus opportunities should be found to deliver this as close as possible to the development site. The existing open spaces in Thame are those where such gains might be appropriate. However, it is recognised that this part of Policy SF02 is not strictly a land use policy and, as such, the Town Council is happy for this to be incorporated in the supporting text instead. Indeed, the current application for Land at Oxford Road may result in off-site provision being made and the Town Council would prefer this to benefit the adjacent Local Nature Reserve rather than a more remote location. The proposal to retain and relocate this point in the supporting text (rather than removing it in its entirety from the Plan) is thus supported. Later in this response, suggested revised wording (in response to comments made by SODC) is made in respect of Policy NEB1, establishing a cascade approach to delivery of biodiversity net gain.

Policy NEC1

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

Town Council response:

1. The Town Council notes and welcomes the comments, and that no response is needed.

Policy GAM1

This is an interesting and innovative policy.

Town Council response:

1. The Town Council notes and welcomes the comments, and that no response is needed.

[B] Questions for the District Council

The Town Council notes that two clarification questions have been posed of the District. Although not for the Town Council answer on behalf of the District, in the interests of assisting the Examiner, comments are provided below.

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.

Town Council response:

1. The policy associated with this site identifies two potential access solutions. Ideally, access would be made via the adjacent site, linking with the street network, structure and form of development. It is though noted that SODC has granted planning permission for the adjacent site and which may preclude this. The other solution is to access the site via Wenman Road. This is the solution proposed by the site promoters.
2. Through the Call for Sites and Site Assessment process the site promoters were asked to confirm the suitability and deliverability of access to the site. The promoters confirmed this and stated that:
 - a) The existing access was built to Highway Standards.
 - b) The existing point of access onto Wenman Road can be suitably re-designed to accommodate two-way vehicle movements.
 - c) Appropriate levels of visibility can be secured from the point of access.
 - d) Further improvements to visibility can be made if necessary given the land in control of the owner extends up to Chinnor Road.
3. Oxfordshire County Council (OCC), as Highways Authority, had been invited to comment at various stages in the evolution of the Neighbourhood Plan (as noted in their Regulation 16 consultation response). Their Regulation 14 response for example, which included comments from the Transport Development Control team, simply states that each of the sites would be assessed on their merits as and when submitted, and that points of access would need to be designed in accordance with appropriate design standards. No concerns were expressed with regard to accessibility to this site. Furthermore, and where site specific comments were made elsewhere in their response, this was just to highlight the proximity of the site to the adjacent Children's Home, and that development should not adversely impact upon this. This is reflected in the policy wording in the Neighbourhood Plan. The Regulation 16 response from OCC does not raise any concerns in respect of access to the site.

Policy GHD1d

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

Town Council response:

1. n/a

[C] Other 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~~ [26]);*
- *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.

Town Council response to representations

The Town Council welcomes the opportunity to respond to representations received during the Regulation 16 consultation exercise. These are presented below.

The East Thame Residents Association (Representation 12)

1. The Town Council notes that the East Thames Residents Association has expressed agreement with policies GDH1, GDE1, GDR1 and GATCP1.
2. In terms of comments made in respect of Policy GDH2, the approach set out in the Neighbourhood Plan is underpinned by the production of the Local Housing Needs Assessment. ETRA state that 1-3 bed homes are needed in Thame. The policy supports this by requiring at least 65% of all new homes to comprise 1 – 3 bed homes.
3. Turning to comments made in response to Policy GDE1, the approach set out in the Neighbourhood Plan is underpinned by the Employment Allocations evidence prepared by Aecom. This recognises that:
 - a. Thame is highly constrained in terms of available land and floorspace, much of the existing stock is old, costly to maintain and operate from, and that it is extremely difficult for local employers to find an alternative site offering better facilities, at any cost, to allow for their existing stock to be vacated and either refurbished or renewed. The proposed uplift to 5.5ha is considered compliant with the employment allocation for Thame set out in the Local Plan, which is for a minimum of 3.5ha of land. The uplift recommended by Aecom report and reflected in the Neighbourhood Plan was based on a cautious and balanced assessment of both immediate and future needs, and

recognition that more employment space could be lost to other uses through permitted development.

- b. Monitoring data undertaken and published by the Town Council shows that while there has been only a minor net headline loss of employment space in Thame since 2011, this is against the backdrop of extremely low availability and a rising working age population in Thame. The Thame Employment Allocations evidence report notes that local companies are constrained in their ability to grow, locally, with some requiring between two – four times their current space in order to thrive. The report also noted that local companies were looking for increased floorspace for warehouse uses. Thame Business Forum members noted that, post-Brexit, ‘just-in-time’ delivery from the continent could no longer be relied on, with many struggling to find room for bulk orders of materials and components.
- c. The proposed “extra” 2 ha therefore responds to existing and future demand but also to enable a qualitative improvement of existing stock. The uplift is modest and should help retain established businesses in Thame.
- d. ETRA propose that employment development should only be allowed if Thame businesses need additional space. This would be onerous and would introduce unusual costs for developers and employers who would not be able to benefit from efficiencies of scale. The proposal would also not appear to allow for or account to be taken of any future loss of existing employment floorspace through permitted development.
- e. The claim that Thame has “only” lost office space since 2011 fails to recognise that office uses provide the highest job densities and would, therefore, have offered employment opportunities for many local residents. In addition, it fails to recognise that the town council’s monitoring demonstrates that there would have been a substantial loss of other employment floorspace had it not been for the fortuitous provision of a 4.8 ha industrial estate just outside Thame’s neighbourhood plan border. With the agreement of the district council, the resulting land and floorspace has been recorded as part of Thame’s provision.
- f. The gains in employment land and floorspace mentioned have been accounted for within the Town Council’s monitoring data and the Aecom employment land allocations evidence.
- g. The proposed 80 / 20 split for warehousing and industrial floorspace reflects the views of local land agents which accords with Thame Business Forum members.

Thames Water (Representation 13)

1. The response from Thames Water suggest that a water and wastewater/sewerage infrastructure policy is required in the Neighbourhood Plan. It states that strategic policies and Local Plans should consider development needs and make sufficient provision for infrastructure associated with water.

2. Whilst the Town Council would be broadly happy with the form of wording and suggested policy from Thames Water, it is not considered necessary for this to be included in the Neighbourhood Plan. The scale of growth envisaged in Thame, and planned for by way of the proposed site allocations, has already been tested through the SODC Local Plan and supporting Infrastructure Delivery Plan. The Neighbourhood Plan is not proposing any growth over and above this. Furthermore, the SODC Local Plan, at Policy INF1, sets out the approach to infrastructure provision, including consideration of existing utilities, the requirements set out in the Infrastructure Delivery Plan, and how these might be delivered. Policy INF4 specifically sets out the approach to water supply, drainage and sewerage capacity, and with supporting text specifically mentioning the role of Thames Water. It is not considered necessary to duplicate this in the Neighbourhood Plan.
3. The response also refers to proximity to sewerage works and potential impacts on amenity. Wording is suggested for inclusion in the Neighbourhood Plan. Again, the Town Council is broadly happy with the form of suggested wording. However, this is, in effect, covered by Policy ENV11 and ENV12 of the adopted Local Plan and, as such, it is not considered necessary to duplicate in the Neighbourhood Plan.
4. Support expressed for the 'Fittings Approach' included in Policy CPQ5(e) is noted and does not appear to require any further response.
5. In terms of Policy NEF1, an additional paragraph of text is suggested. The Town Council is happy for this text to be included in the Neighbourhood Plan as supporting text to the policy. This could potentially be added as an additional paragraph after current paragraph 7.26 in the Plan.
6. The table of comments on the development sites is helpful though, as noted in the response from Thames Water, it is for the applicant to liaise directly with them through the planning application process.

Oxfordshire County Council (Representation 21)

1. In general, the Town Council welcomes comments from OCC, including their expressed support for the Neighbourhood Plan and suggested amendments relating to typographical errors and reference to appropriate design and other standards that should be referenced.
2. In terms of specific points:
 - a) OCC suggest that the application of parking standards be removed from the Cattle Market site given its location. The site is indeed a 'sustainable' location but the comments fail to recognise that it currently operates as the only long stay car park in Thame, which is well utilised by visitors to and employees in the Town Centre, and that provision of parking is a key matter for local residents. Responses to consultation exercises made clear the importance of parking and that significant losses of parking from the town centre would not be supported. The submission version of the Plan was amended in response to considerable feedback on this matter received during the Regulation 14 consultation, with the approach taken to parking on the site more closely

reflecting that in the made Neighbourhood Plan. The Town Council does not agree that the policy should be further amended.

- b) The Town Council notes the representations state that the 'Decide and Provide' approach to Transport Statements and Assessment must be followed, despite comments from SODC on this. The Town Council agrees with OCC.
- c) OCC proposes an amendment to the caption associated with Figure 26. The proposed change implies that the figure shows all open spaces in Thame. This is not strictly true. The Town Council would prefer the caption to remain as is.

Beechcroft Developments (Representation ~~1326~~)

1. Comments in respect of Policy GDH1, Part 4, note that the Plan effectively expresses preference for reuse of previously developed land in the built-up area but that sites that do come forward are more likely to be greenfield given the scarcity of land in Thame. As a review of development and historic windfall schemes in Thame indicates, previously developed land has and continues to provide a consistent supply of land for new development in Thame. This reflects the approach outlined in the NPPF (section 11) which promotes and supports the development of under-utilised land and buildings. The response suggest that the catchment distances in Table 2 as referenced in the Policy should be more flexibly applied and, by extension, support the use of greenfield sites. The Town Council is of the view that the current policy wording, which states that applicants should have regard to the catchment distances, rather than slavishly adhering to them, provide that flexibility, whilst also responding to the core objectives of the Plan and its support for a compact settlement. The Town Council does not agree that any further change is required based on these comments.
2. Comments made against Policy GDH2 suggest it should be rephrased to support applications for homes for the elderly on unallocated sites. This is already effectively included in the Policy (at Part 8) and thus no further change is required.
3. Comments made against Part 2 of Policy GDH2 have been addressed in Section A in response to clarification questions from the Examiner and are not repeated here.
4. In terms of Part 3 of Policy GDH2, the Town Council suggests that the wording at the start of the Policy is changed to clarify that the requirement for First Homes does not apply to all development proposals and is changed to read as '*All qualifying developments in Thame are required, where viable...*'.
5. Comments made against Policy CPQ5 seek to remove reference to zero carbon development. The Town Council does not agree. Although the Policy does not require such standards to be met, it does signal strong support for high standards of sustainability, encouraging innovation and responsible development. As noted elsewhere, this is a key aspiration and should not be diluted through further change.
6. Comments on the inferred conflict between part 1 and 2 of the Policy NEB1 in respect of on and off site provision of biodiversity net gain is noted. Suggested alternative text that helps clarify the position is presented below in response to comments from SODC (Representation 42).

Hallam Land (Representation 29)

1. The support expressed for the Neighbourhood Plan is noted and welcome, stating in particular that the Plan takes a positive approach to the achievement of sustainable development.
2. Comments made in respect of the housing figure for Thame are addressed in response to the clarification question posed by the Examiner in Section A above and are not repeated here.
3. In terms of Part 2 of Policy GDH1, the separate identity of Thame and relationship with the surrounding countryside is central to the vision and objectives of the Plan. As appropriate to any application for development that comes forward, landscape and design proposals, and supporting analysis, would need preparing and considering when determining the impact of any proposed development on coalescence and visual separation between Thame and outlying settlements. It is not considered necessary to amend the policy wording.
4. In terms of Part 4 of Policy GDH1, supporting text in the Neighbourhood Plan (paras 4.8 – 4.10) explains that the distances in Table 2 are ‘reasonable distances’, as opposed to ‘optimal distances’ as suggested by Hallam. This part of the Neighbourhood Plan needs to be read in the context of the overarching vision and objectives for Thame as being a compact and walkable place and which is developed further in other supporting policies and projects, including, for example, Policy GAAT1 and associated Project GAAT(a) which support provision of active travel routes and infrastructure. These aim to support inclusiveness, health and wellbeing, recognising the importance of access to local services and facilities and improving the links between these. Such an approach is central to the ‘twenty-minute neighbourhood’ concept established by the TCPA and which is embedded in the Neighbourhood Plan. The approach is a response to the achievement of sustainable development which Hallam says the Plan takes a positive approach to.
5. The suggested amendments to this part of the Policy as proposed by Hallam have been reviewed against the comments from OCC which recommend that reference is made to their Transport Use Hierarchy, as set out in Policy 1 of their Local Transport and Connectivity Plan, and which is used by OCC when responding to proposals. The text suggested by Hallam is less compatible (than the Neighbourhood Plan) with the OCC Hierarchy and could be read as contrary to Policy TRANS4 of the SODC Local Plan. Instead, and in response to OCC comments, the Town Council proposes that an additional sentence is added to the end of Part 6 of Policy GDH1 which reads:
‘Such assessments and statements should demonstrate how the development proposal has been developed in line with the transport user hierarchy established in the OCC Local Transport and Connectivity Plan’.
6. Comments made in response to Policy GDH2 suggest that additional wording should be added to support provision of homes for an ageing population. The policy already clearly supports such proposals and thus the Town Council is of the view that no further change is required to the policy.

7. In terms of employment (Policy GDE1), the response suggests that reliance on one employment site constitutes a risk and that land at Howland Road should also be allocated. This site was subject to masterplanning undertaken on behalf of the Town Council to better understand the potential for the site and whether it might be needed as an alternative should land at Rycote Lane not be able to accommodate the quantum of development required under Policy GDE1. The work undertaken has shown that the land at Rycote Lane can indeed accommodate the quantum of employment space required. The promoters of land at Rycote Lane have also confirmed that the site is deliverable.
8. The response also draws upon the Consultation Statement to state that 48% of respondents agreed or strongly agreed with allocation of the site, as opposed to 29% that disagreed or strongly disagreed. This is misleading as it only reports on the findings of the consultation undertaken in September 2021, only relates to part of the wider area of land at Howland Road under consideration at that time, and when land at Rycote Lane was not presented as an alternative option. The later consultation, undertaken in March 2022, indicates that around 65% of people responding to consultation expressed preference for the site at Rycote Lane to come forward for employment as opposed to 35% at Howland Road.

Bloor Homes and Regeneration Thame (Representation 34)

1. Comments made by Bloor Homes in respect of the allocation of Land at Oxford Road are addressed in response to the Examiners Clarification Questions in Section A and are not repeated here. In respect of other points raised in response to the Neighbourhood Plan:
 - a) The Town Council does not accept the proposed changes made to Objective 3. The revised text implies that it is only unallocated sites that should avoid impacting on the countryside. The relationship between Thame and the surrounding countryside is a core objective, well supported through consultation, and should apply to all development that comes forward.
 - b) Comments in respect of the housing numbers in the Neighbourhood Plan are addressed in response to the clarification question posed by the Examiner in Section A above and are not repeated here.
 - c) Use of the word 'approximate' in the Neighbourhood Plan in respect of housing figures on each of the allocated sites acknowledges that there are a range of constraints on each of the sites that need to be addressed through the detailed planning application process and this allows for some flexibility. On the Oxford Road site, the use of the word 'approximately' is more appropriate than use of 'at least' given matters such as heritage and landscape, and open space provision.
 - d) Comments on housing mix are supportive of Policy GDH2, though the impact of delivery of First Homes on the viability of development is raised. However, this is already reflected in Part 3 of the Policy which states that the maximum discount on First Homes is supported where viable.

- e) In the interests of clarity, the Town Council is happy to amend Policy GDV1, Part 2, as suggested.
- f) Comments on Policy CPQ1 are noted. Comments made by the Examiner on this Policy are also noted and thus no change is considered necessary.
- g) The response questions whether Policy CPQ5 is required as it may eventually be superseded. That may be the case and the same could be said for many policies in all development plans. However, until such time as national policy and building regulations are updated, the policy remains relevant. The implications of the Written Ministerial Statement are well understood and thus the Policy does not seek to impose additional requirements. Rather, the policy is phrased as one that expresses support for and encourages development to meet high standards of sustainability. The standards included in the Policy in respect of water use (Part E) do exceed Building Regulations but this is allowed for given the designation of the region by the Environment Agency as being seriously water stressed. This approach is supported in the Government's Environmental Improvement Plan and in the Joint Local Plan being prepared by SODC and Vale of White Horse (see Policy CE7). Overall, the policy reflects strong consultation feedback on the importance of sustainability standards and the proactive role taken in Thame to the environment through production of the Green Living Plan for example. It is not considered that any change is required based on these comments.
- h) The response suggest that Policies CPQ6 and CPQ7 should be included in the Design Code rather than the Neighbourhood Plan. The Town Council does not agree. The quality of the street environment and parking solutions have a major bearing on the quality of place and it is quite right that this is reflected in policy in the Plan, emphasising the importance of good quality design and development. It is noted that similar policies have been included in other Neighbourhood Plans that have been successfully made. It is noted that OCC (as highways authority) has not commented on the inclusion of these policies in the Plan and that, other than very minor wording changes to CPQ6, SODC is also happy with inclusion of these policies in the Plan. It is not considered that any change is required based on these comments.
- i) In terms of Figure 26 and Policy SF02, it is common ground between the Town Council and Bloor Homes that publicly accessible open space provided through the first Neighbourhood Plan will have to be retained and or reprovided to facilitate delivery of land at Oxford Road. The Town Council is happy to consider the suggested alternative policy text and or an amendment to the title of Figure 26 should that help provide clarity and is happy to be guided by the Examiner on this.
- j) Comments in respect of Policy NEB1 are noted. The Town Council has suggested alternative wording for the consideration of the Examiner. This is presented by way of a response to comments made by SODC (as presented in the last section of this response).

- k) Comments in respect of the mapping associated with Policy NEC1 are noted. The Town Council is happy to update should the Examiner agree that would be helpful.
- l) The Town Council does not agree that Figures 31, 33 and 34 need updating. These are purely conceptual plans which help illustrate ideas in an easily accessible way. Evolution of the ideas will be subject to further testing, either through the planning application process or through other non-planning policy related initiatives.

CALA Homes (Representation 46)

1. The support expressed for the Neighbourhood Plan process and overarching objectives is noted.
2. Comments in respect of the housing numbers in the Neighbourhood Plan are addressed in response to the clarification question posed by the Examiner in Section A above and are not repeated here.
3. The representations seek to make the case that the site they are promoting performs better than land at Oxford Road and should thus be allocated in the Neighbourhood Plan. The preference for allocating land at Oxford Road is a direct result of the plan-making process which has been underpinned by extensive consultation and various assessments, all of which form the package of documents submitted for examination and summarised in the Site Allocations Topic Paper. The allocation of land at Oxford Road satisfies the test of the Basic Conditions.
4. It is to be noted that through the plan-making process the site promoter was requested to provide evidence that vehicular access to the site could be delivered given the nature of the existing street network and presence of a ransom strip along the site boundary precluding access to the highway network. No evidence was provided as to how this might be addressed. Instead, the Town Council was provided with the following information in January 2024, repeating previously provided information in November 2021:

May I confirm that in the Sale Agreement of the land between the original owner and Persimmon the following obligation was imposed and rights reserved as follows:

- *Persimmon are obligated to provide a roadway corridor of a defined width including full service media from Thame Park Road to a point as near as practically possible to the western boundary.*
- *The original owner retains step in rights to do the works in the event of default.*
- *The original owner retains rights to use, connect into and upgrade the roads and services once they are provided.*
- *The original owner retains the rights to extend the road and services across any gap between the end of them and the western boundary.*

All these rights are transferable so will equally benefit CALA in the event it is successful in achieving planning permission to develop the adjoining land.

5. The above suggests that the ransom strip could potentially be addressed, but there is no guarantee that it can be. Equally, no confirmation has been provided that the proposed area of development can be satisfactorily served by the street network in the now built-out Persimmon scheme. This is a crucial point as notwithstanding the owner's rights to step in and "upgrade the roads and services once they are provided", Persimmon do not appear to have entered into an agreement to have their highways adopted by OCC. Both Town Council Members and the public expressed concern during consultation that one sizeable estate in one management / ownership company (Cala Homes) would be entirely served by roads owned and maintained in perpetuity by another (Persimmon): in effect, the streets within the existing Persimmon development area would be burdened with the additional extra traffic associated with provision of access to the adjacent site and that the additional burden of the costs for maintenance and management of the access would fall on the residents of the Persimmon development. There does not appear to have been any resolution to this issue.

J M Castle Trust (Representation 47)

1. The support expressed for the Neighbourhood Plan and allocation of land at Rycote Lane for employment purposes is noted, as is confirmation that the site is available and deliverable. General support for and agreement to the criteria set out in Policy GDE1 of the Neighbourhood Plan is also noted.
2. The representation comments on the size of employment units set out in the masterplanning document that supports the Neighbourhood Plan and that these will be driven by the planning application process and marketing of the site. Policy GDE1 does not specify building sizes to be accommodated on the site but instead identifies key design principles that should be followed. It does not preclude a different range of buildings to come forward nor, within the framework established by the principles, an alternative arrangement of buildings and spaces. This is clarified in section 1.1 of the masterplanning report. Equally, this applies to the location of any landscaping and SuDS to be provided on site. The detailed design process to be followed through the planning application process will allow for a more informed design response to the site to be prepared.
3. The representations also suggest that a new character area be identified for land to the west of Rycote Lane. Whilst there is some merit in this it is not considered entirely necessary as the design process followed in the masterplanning report has been informed by the existing context (built and natural) to help inform design principles.

Stopford Properties Limited (Representation 51)

1. The response says that the Employment Allocations evidence underestimates the requirement for new employment land in Thame because it incorrectly includes new employment development (on Rycote Lane) that is located outside of Thame within its calculations. Although just outside the Thame Town Council boundary, the land that has come forward on Rycote Lane forms part of the Thame employment cluster

assessed in the employment land evidence underpinning the Local Plan, informing the requirement established in that for Thame, and thus counts towards the employment land supply in Thame. This has been agreed with SODC.

2. The response states that the Regulation 14 version of the Neighbourhood Plan included a windfall policy on employment land which has since been removed but should be reinstated. The policy was removed based on advice from SODC who advised that it was overly restrictive and unnecessary, and that SODC would consider applications on their merits against Local Plan policies. Elements of the previous policy are now incorporated into Policy CPQ2 (Design Principles for Employment Development) in the Neighbourhood Plan.
3. The recommendations of the Thame Employment Allocations evidence report state that it is based on a cautious approach that should avoid over-provision of employment land. This report has been informed by surveys of local businesses and interviews with local employment land agents. The conclusions of the report note that it is striking a balance between need and demand whilst responding to the character of Thame in terms of the balance between housing and employment land.
4. The proposed allocation of land at Rycote Lane in the Neighbourhood Plan responds to the findings of the Employment Allocations report. Notwithstanding previous assessments of employment supply undertaken by Thame Town Council, the recommended figure of 5.5 hectares of land in the Employment Allocations report is the most up-to-date position and has been derived following a considered evaluation of past loss, current demand and anticipated employment land trends.
5. Policy GDE1 has been developed in consultation with stakeholders and with the benefit of a landscaping assessment undertaken as part of the Thame masterplanning report. The criteria are considered necessary to ensure development reflects the site's gateway location.
6. The Rycote Lane and Howland Road sites were assessed separately in the Neighbourhood Plan Environmental Report. This considered the Howland Road site to be slightly more harmful in landscape terms than the allocation site at Rycote Lane.
7. The response seeks to promote the benefits of the Howland Road site and include it within the Neighbourhood Plan. Based upon the approach taken, including various supporting assessments and outcomes of consultation, it is considered that the allocation of land for employment at Rycote Lane satisfies the Basic Conditions and no further change is required to the Neighbourhood Plan.

Rectory Homes (Representation 52)

1. Comments in respect of the required number of homes are addressed in response to the clarification question posed by the Examiner in Section A above and are not repeated here.
2. Points in respect of green space and the proposed 'land swap' set out in para 4.30 of the Plan (not 4.3 as per the representations) are addressed in response to clarifications posed by the Examiner in Section A.

3. Comments in respect of First Homes are noted. The position in the Neighbourhood Plan reflects the findings set out in the Housing Needs Assessment prepared in support of the Neighbourhood Plan. SODC has also commented on this and proposed an alternative form of wording which suggests that higher discounts on the First Homes product are supported where viable. The Town Council considers this to be an appropriate form of wording and is happy for the text to be modified as proposed by SODC.
4. The support for and comments made in respect of the Cuttlebrook Corridor (Policy NEC1) are noted.

The District Council (Representation 42)

1. The Town Council notes and welcomes the support expressed for the Plan in Part B of the comments form.
2. In short, the Town Council is comfortable with the majority of changes suggested by SODC, recognising that they are provided in a positive and constructive manner, and will help bring clarity to the Plan and effectiveness of the policies.
3. However, there are a small number of points that the Town Council wishes to make in response to these:
 - a) In terms of Policy GHD1 (Comment reference 4), SODC states that reference to the 'Decide and Provide' approach to Transport Assessments and Statements needs to be changed from saying that applicants 'must' follow this approach to instead saying they should 'have regard to' it. The Town Council acknowledges the reasons given for this suggestion but does not agree. This weakens the policy and allows for the outdated 'predict and provide' approach to be followed, and which will not help deliver modal shift and wider aspirations for a walkable town. Indeed, the response from OCC specifically states (on page 4 of the Regulation 16 response) that *"The County's Decide and Provide approach must be implemented..."*. Indeed, and although the Town Council recognises that current proposed changes to the NPPF are just that, these do state (in proposed changes to para 112) that a 'vision-led approach' should be taken. This is, in effect, an expression of support for the 'Decide and Provide' approach promoted by the County Council.
 - b) The Town Council is comfortable with the suggestion under Comment 4 that Policy GDH1 is split into two separate policies, and which the Examiner has also asked about (in Section A). However, the Town Council does not agree that Parts 1 – 8 of the Policy should be framed as a 'windfall development' policy. Parts 1- 8 apply to all housing development proposals, including the allocations. If it were only apply to windfall then it would imply that matters in respect of coalescence, connectivity, proximity to services, transport assessments and heritage for example would not apply to the allocations. This is not the case. The allocations are guided by and should be subject to these policy matters too. This would thus mean that the Parts 1 – 8 of the Policy might simply be titled 'Housing Development' and the text in Part 1 of the current version of the Policy should remain as is.

- c) Under Comment reference 7, SODC has raised concern as to the ability to access site GDH1b (Diagnostics Reagents). The Examiner has directed a clarification question about this to SODC (in Section B of this correspondence). The Town Council has provided a response to this in Section B and does not repeat that here.
- d) Under Comment 13:
- i. SODC suggest that text in Policy GDR1 (The Cattle Market) be reordered. The Town Council has set out its position on this in response to questions from the Examiner (Section A) and OCC (see above). The importance of the site in providing town centre car parking cannot be overstated. This was emphasised through extensive responses to the Regulation 14 consultation and the wording of the policy has been carefully drafted to reflect this. The Policy makes clear that development of the site is supported, and the form and type of development that would be supported, but that the function of the site as providing car parking must be recognised. The policy seeks to carefully respond to the potential for development and local concerns about this, and thus whether the Policy (and Plan as a whole) will be supported at referendum. The Town Council does not agree that the Policy needs to be reordered.
 - ii. The revised policy text suggested by SODC also removes reference to the last sentence of current Policy Part 2 which states that existing parking spaces on site will not count towards the requirement for new parking that is generated by development. Given the importance of parking this clarification should remain.
 - iii. The revised Policy text suggests removing reference to the Use Classes Order. The Town Council has commented on this in response to clarifications from the Examiner in Section A and does not repeat those here.
 - iv. The response suggests that current Part 6 (the opening and operation of a new Cattle Market) becomes new Part 1 of the policy. For reasons given above, the Town Council does not agree that this needs to be the first Part of the policy.
- e) Comment 15 addresses the extent of the primary retail frontages shown in Figure 21 and referenced in Policy GDR2. The comment draws on the Town Centres and Retail Study (December 2023) undertaken to inform the new Local Plan and, based on this, that the extent of the primary retail frontage should remain as per the current Local Plan. However, and despite the Cattle Market being a long standing allocation (as identified through the first Neighbourhood Plan), the study does not make any reference to this. It is important to note that the Cattle Market is the single biggest opportunity for change and development in the Town Centre, and where that change must be successfully integrated with and contribute towards an enhanced town centre offer. Identification of an extended primary retail frontage will help tie the site and proposed uses into the main retail area. This aligns with para 90 of the NPPF which supports the allocation of mixed use sites in town centres, defining the

extent of primary retail areas and uses appropriate within these, forming '*part of a positive strategy for the future of each centre*'. The Town Council is of the view that the extent of the primary retail frontage shown in the Neighbourhood Plan does not need to be amended.

- f) Under Comment 20, the Town Council is concerned that suggested wording changes to Policy NEB1 (Biodiversity) remove reference to biodiversity net gains being delivered on-site, and instead simply states that a minimum 10% net gain should be delivered. This does not tie delivery of net gains to the site or indeed general location, and could risk net gains being delivered elsewhere, and where they have no relationship to the site and localised impacts of development. The Environment Act makes clear that net gains should be delivered on site unless this is not practicable. This is the position that the Town Council has taken in the Neighbourhood Plan. However, it is recognised that the current form of wording in the policy could potentially lead to a conflict between Parts 1 and 2. To help resolve this, the Town Council suggests that reference to the location of net gain is replaced with the following, which we believe helps to provide the necessary level of clarity:
- i. Proposals for development must secure a minimum biodiversity net gain of 10% following a cascade approach:*
 - a. Opportunities should be taken to provide and enhance biodiversity on-site in the first instance.*
 - b. Where on-site delivery is not practicable off-site enhancements should be delivered as close to the site as possible, where feasible, within the Neighbourhood Plan area.*
 - c. Provision of financial contributions in lieu of biodiversity net gains, or delivery elsewhere in the District, will only be supported where the applicant has been able to demonstrate that both on and off-site delivery in the Plan area is not possible.*