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L 190213 MD Thame Site G SODC LP FPV2 Reps V2



Planning Policy  
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Dear Sir / Madam

### **Representations to South Oxfordshire Local Plan 2011-2033 Final Publication 2nd Version on Behalf of the Castle Family (Landowners at Thame)**

Savills is instructed by the Castle Family to make representations on the recently published South Oxfordshire Local Plan 2011-2033 Final Publication 2nd Version (FPV2).

By way of background the Castle Family own land known as Site G in Thame which is shown on the Site Location Plan enclosed with this letter, as well as other land interests in South Oxfordshire. While not site specific given that the FPV2 does not generally allocate land in market towns these representations are made in light of these land ownerships.

These representations focus on the soundness of the policies of the South Oxfordshire Local Plan as assessed against the tests of soundness as set out at paragraph 35 of the NPPF. Relevant policies will therefore be assessed in turn below in terms of soundness. Where a deficiency is identified, changes are proposed to remedy this.

#### STRAT1: The Overall Strategy

The identification that the market towns of Thame, Henley-on-Thames and Wallingford are providing new homes, jobs, services and infrastructure is welcomed. This responds to an identified need for development to be accommodated in these settlements and this is **sound**.

#### STRAT2: South Oxfordshire Housing and Employment Requirements

The District-wide requirement for new employment space has been informed by the 2014 SHMA and seeks to meet the upper figure of the range. This corresponds with the source of the housing figures used and so is consistent. As such, the overall District wide requirement for housing is **sound**.

However, the wording of point 6 is unclear as to whether a review would be completed within 5 years or merely started. As such this element of the policy is **unsound** as it does not conform to national policy in the form of paragraph 33 of the NPPF.

#### TH1: The Strategy for Thame

The generality of the policy is supported in that it reflects the need for Thame to accommodate a range of uses commensurate with its status as a market town. Particularly welcome is the references to additional employment and an improvement to visitor facilities which will be discussed further below. As such the policy is considered **sound** in so far that it relates to employment and tourism facilities.

#### EMP1 – The Amount and Distribution of New B-class Employment

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The identification of new employment land at Thame is welcomed as a reflection of its important role in the settlement hierarchy of the District.

However, the policy and explanatory text is unclear as to whether this new land for employment includes an allowance for employment land that has been lost since the publication of the 2014 SHMA.

This includes floorspace at Kingsmead Business Park which has planning consent for conversion to residential development under permitted development rights (P17/S4127/PDO). It should also be noted that the business park is also currently the subject of a planning application which seeks permission for 129 dwellings, a 68 bed care home and some office space (P18/S3143/O). This office space would be much less than the current employment floorspace on the site and therefore must be seen as a significant net loss. It is understood that this application will be heard by planning committee imminently.

Given that there has been such a loss over recent years the Council should ensure that the requirement for new employment development within Thame should not be used simply to replace space that has been lost. Rather it should be additional development land that can cater for the demand for premises by existing businesses based in Thame seeking expansion, and also new business that can be attracted to the area which would contribute towards more sustainable commuter patterns.

As such, until clarity is received as to whether the proposed 1.6 hectares of additional employment space is catering for the new need arising in the 2014 SHMA or merely replacing employment land that has already been lost to other development, the policy is considered to be **unsound** on the basis that it is not positively prepared. In addition the policy would also fail to accord with objectives 3.1, 3.2, 3.3 and 3.5 of the FPV2.

Policy EMP1 should be amended to make clear that the uplifts in employment land should be in addition to that present in 2011 as the start of the plan period. As such, any net loss in between 2011 to present day would need to be replaced in addition to the new floorspace being provided.

Furthermore, it is noted that there does not seem to be a trajectory for the delivery of employment land within the FPV2 for supporting documents. It is noted that a significant proportion of employment growth in the plan period is from strategic developments, which in terms of housing and therefore presumably employment will only begin to deliver in any significant way in 2024/25 (Appendix 8 of the FPV2). While the presence of employment land on the strategic sites and its delivery is not doubted, it does raise the issue of residential growth in the early part of the plan period being unmatched in terms of employment.

Increased employment floorspace in sustainable towns such as Thame would bridge that gap and ensure that employment was available for existing and future residents in an accessible location with an existing quantity of labour.

It is recognised that the key element of the Council's wider strategy is to devolve responsibility for specific allocations to Neighbourhood Plans in locations such as Thame. As a general point this is welcomed and the Castle Family look forward to working with the Town Council to meet the requirements identified within the Local Plan in the most sustainable locations in accordance with the provisions of the NPPF, emerging Local Plan and Thame Green Living Plan.

#### EMP2: Range, Size and Mix of Employment Premises

It is agreed that the creation of a range of business premises is required as part of new provision. The mixing of uses as part of new employment provision, including tourism and leisure facilities is also important in creating locations that attract a range of people in accessible locations and increase the use of the land across various parts of the day.

#### EMP6: Employment Land at Thame

Please refer to comments above in relation to EMP1. For these reasons it is considered that EMP6 as currently drafted and without clarity that the 1.6 hectares will be for emerging needs and not replacing floorspace lost in recent years is **unsound**.

As previously stated, the Castle Family look forward to working with the Town Council to meet the requirements identified within the Local Plan in the most sustainable locations in accordance with the provisions of the NPPF, emerging Local Plan and Thame Green Living Plan.

EMP12: Tourism

The identification of a need for hotel space within the market towns, including Thame, in accordance with the Hotel Needs Assessment 2014. This will be an important enhancement to the current offer of Thame which attracts visitors owing to its attractive high street, plethora of pubs and links to Midsomer Murders.

As currently drafted EMP12 only supports larger scale development, such as hotels, within the “built-up area” of towns. Given the scale of larger scale development and the need for car parking in a location such as Thame, it is not always possible to find locations within the built-up area without displacing other uses.

Therefore, while new visitor facilities in the market towns are supported in general, the fact that limited land within the built-up area is available for uses such as hotels. In places such as Thame, it means that the policy is not effective and therefore it is **unsound**.

This part of the policy should be amended to read as follows to be considered as effective:

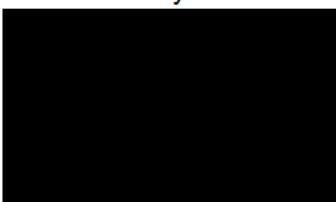
*“i) within the built-up areas of the towns and on suitably accessible edge of settlement locations – large scale developments including conference facilities, museums, heritage centres, hotels, guest houses, and associated facilities for visitors”.*

Summary

As currently drafted the South Oxfordshire Local Plan is **unsound**.

Amendments and clarification are required in terms of the amount of employment space allocated to Thame, and suitable locations for tourist infrastructure.

Yours faithfully



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Associate Planner

Cc.  
James Castle