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Cc: [Cllr John Cotton](#); [Cllr Jeannette Matelot](#); [Cllr Nigel Champken-Woods](#); [Cllr David Dodds](#); [Cllr Nick Carter](#); [John Howell MP](#)
Subject: Local Plan 2032 Preferred Options Consultation - Thame Town Council Response
Date: 19 August 2016 13:02:00

Thank you for the opportunity to respond to the consultation on the South Oxfordshire District Council (SODC) Local Plan 2032, Preferred Options. A consultation team was delegated with responsibility to progress a response to the Consultation on behalf of Thame Town Council.

a) We welcome the assurances from the Leader of the Council at the Town and Parish Forum on 12 July 2016 that all that is contained in the consultation is suggestion only / "a starter for 10" and it is all still open for full discussion.

b) The existing adopted Thame Neighbourhood Plan as approved by the community of Thame in 2013 via a referendum provides all the fully sustainable growth needed by Thame up until 2027. Actual housing provision is in practice being front loaded as opposed to being developed over the whole life time of the plan. We can plan for the additional 5 years from 2028-2032 at the appropriate time (which is not now), once there is full understanding of the full impact of the current rapid growth.

c) Thame has delivered on its Neighbourhood Plan. We allocated sites for 775 houses over 15 years to 2027, but planning and development has been concentrated in the early years and needs to be assimilated. We have earned a period of grace before being threatened with even greater numbers.

d) SODC has said that they are pleased with the rapid growth in Thame facilitated by the existing adopted Neighbourhood Plan. There is no justification for exploiting Thame's housing delivery performance by loading us with yet more, and effectively consigning our pioneering and nationally acclaimed Neighbourhood Plan to the bin at such an early stage. In effect, the forward vision of the community would be destroyed. Such an action would undermine the very principle of Neighbourhood Planning and SODC's proclaimed support for Neighbourhood Plans.

e) We have been consistently told that no housing numbers were being allocated as it was hoped that Neighbourhood Plans would deliver. This was disingenuous to Thame as the consultation clearly states that if Thame does not adequately progress with allocating sites in a new Neighbourhood Plan then it will be taken out of our hands with SODC supporting speculative planning applications that conform to higher level policy.

f) We know that SODC's position is that the SHMA / OAN (2 year old) numbers are not up for discussion, but our view is firmly that they are not adequately justified and to a certain extent are at a level to provide housing for out of district commuters rather than for full local need.

g) The Strategic Economic Plan is supposed to reflect 'objectively assessed need'. However, with its aspiration for growth at three times the national rate it could be described as forced economic growth. There is virtually zero unemployment in South Oxfordshire (0.4% in Henley constituency) so where is the need? And what about the Northern Powerhouse?

h) The Local Plan Expert Group outcomes may have an impact on SHMA / OAN

figures. That should be noted in the plan, and allowances made for the possible 20-30% reduction that may come about.

i) To be sustainable, specific housing for the Oxford City shortfall (e.g. for NHS staff) should mostly be specifically allocated close to Oxford. We know that SODC are reticent to propose green belt development, but the generic position by central Government must not stop all proposed green belt sites being used for Oxford need. There is space for existing green belt provision to be reallocated if necessary, in line with paragraph 83 of the NPPF. We know that other Local Plans / Core Strategies include some green belt development, including Vale of White Horse, Gloucester/Cheltenham/Tewkesbury, Leeds, Greater Nottingham, Stratford-on-Avon District, South Derbyshire and Cambridge City. More detail on specific paragraph references within those Local Plans / Core Strategies is available on request.

j) The options do not take into account any projection of future windfalls within Thame. Thame's experience over the last five years and known current potential windfall sites mean that there is potential for the proposed additional allocation for Thame to be largely provided for by windfalls. Thame has already provided 233 windfall dwellings since the adoption of the Neighbourhood Plan and at a conservative rate of 25 per annum until 2032, this windfall provision would more than cover the proposed 600 additional dwellings for Thame. These should be taken into account / planned for. Sites not planned include the existing health centre, the old police station, additional elderly residential at The Elms, Goodson Industrial Mews, old office space converted under permitted development rights and redundant employment space. There is no point in allocating new green field sites now, when they will not be needed, but be built out in a short timescale, and then be lost forever.

Paragraph 48 of the NPPF specifically allows for planned windfalls in years 1-5. Paragraph 24 of Planning Practice Guidance gives advice on windfall planning for years 6-15. Local Plans / Core Strategies that include windfall allowances include Cherwell, Vale of White Horse, Gloucester/Cheltenham/Tewkesbury, Leeds, Greater Nottingham and Stratford-on-Avon District. More detail on specific paragraph references within those Local Plans / Core Strategies is available on request.

The need for proper planning for windfalls in Thame, in line with NPPF and Planning Practice Guidance is the most critical aspect of this response, which is also in keeping with brownfield ahead of green field development.

k) When the Local Plan does cater for planned windfalls, we would accept a review point, say every 4 years, to assess progress against the planned windfall rate and to allocate additional sites at that point if the planned rates are not being met.

l) Affordable Housing allocation for local people. Only 20% of new social rented dwellings are reserved for local people. There is NO reservation of intermediate housing for local people. This reservation for local people ratio MUST be increased, at least to reflect the proposed change in affordable allocation of social rented / intermediate housing from 75%/25% to 50%/50%, but preferably to a ratio that significantly favours locals over incomers. It is critical that housing provided in Thame is affordable for those living in Thame. Of the 775 dwellings in the current Thame Neighbourhood Plan, only 46 will be reserved for local people (and none to buy). Of the proposed 600 additional dwellings, only 24 will be reserved for local people (and none to buy). Other Local Plans have enabled much more "local first" allocation.

m) There is limited provision in the Preferred Options for the specific needs of the

adopted Thame Neighbourhood Plan. E.g. a Community Centre. It concentrates on the allocation of additional housing numbers, retail provision and employment allocation rather than clear definition of infrastructure needs / provision. This highlights no recognition of the overall vision for Thame.

n) There seems to be no element of 'planning' in this plan. It is just a process for dumping numbers on communities with little thought to the impact.

o) Retail. The independent [Carter Jonas Thame Retail Capacity & Impact Study](#) (November 2015) provides a solid evidence base, using SODC/GVA data, on capacity and impact of retail provision within Thame over different time periods. The Preferred Options define a retail requirement that doesn't fit with that evidence. The 1500sqm must therefore be treated as a ceiling and not a need. A compromise may be acceptable (subject to further public consultation) provided that there is no net loss of parking provision, and preferably an increase.

We also believe that provision could be provided by more than one new shop, such as a greengrocer, a fishmonger, and another butcher or bakery, rather than assuming that provision should comprise a single small format / convenience food store.

Of the required maximum 1500sqm retail the current Neighbourhood Plan has already addressed the need for 600sqm up to 2027 and identified possible town centre site locations. The extra requirement to 2032 is relatively small and certainly not urgent.

p) Retail. Page 63, para 8.14 states that '*Wallingford has the lowest convenience goods expenditure retention rate of the four towns in the district*' yet then states in relation to Thame, page 78 para 10.13, that our '*expenditure retention rate for convenience goods is slightly lower than other towns in the district*'. These are conflicting statements. Which one is correct? This questions the validity of the evidence base.

q) Allocation of additional employment land is welcome. But this must be primarily to enable local growth / resizing, which in turn would lead to regeneration / refurbishment (or even windfall reuse) of existing run-down employment land.

r) To be fully sustainable, new housing must be provided for as close as possible to employment, and not for long distance commuters. There is no sustainable point in Thame being a commuter town for Oxford / London. The good rail/road transport links that Thame has should be to enable Thame residents who live and work in Thame to have a better quality of life and not for those who only live in what becomes a dormitory town, working far away. That is not sustainable – and does not support a sustainable community.

s) The jobs growth in South Oxfordshire is mostly concentrated around the Science Vale. Housing should be allocated close to employment. Page 16, OBJ 1.4 is to '*focus growth on Science Vale delivering homes and jobs*' and page 17, OBJ 3.3 is to '*ensure economic and housing growth are balanced and facilitate sustainable journeys to work*'. Thame is easily accessible to the M40 / rail and will therefore only serve to support London commuters, which does not help to satisfy local needs. This view is reinforced on page 43, para 6.4 which acknowledges '*a significant degree of out-commuting*' and '*a leakage of highly skilled residents to employment elsewhere*', page 44, para 6.9 which states '*we aim to reduce long distance out-commuting*', and page 45, para 6.13 which states '*housing and employment provision should be in close proximity to each other*'. Page 67, para 9.5 also suggests that Didcot and Science Vale

should provide 'a range of new homes to balance the new jobs'. The proposals for further growth in Thame, therefore directly conflict with clear policies stated in the plan.

t) It would waste public money to rewrite the Thame Neighbourhood Plan so soon. We would be happy to discuss very specific amendments that don't compromise the general principles.

u) Thame has a Neighbourhood Plan Continuity Committee with a full time Neighbourhood Plan Continuity Officer, to keep the current Neighbourhood Plan on track. It does not need additional pressure from a Local Plan serving non-Thame needs pushing it off track.

v) We have no strong opinion on a new reservoir but recognise that it could be positive if it also provides a full range of leisure provision, without restriction.

w) Although we have been told that fairness is not a consideration – the unfairness to Thame must be pointed out. Planned housing growth for Thame since 2011 to 2027 as defined by existing Core Strategy / Neighbourhood Plan is already 19% (4875+162+775). With known and conservatively projected unplanned windfalls which cannot be prevented (+233+400) it will be 32% by 2032. With 600 extra dwellings it will be 44%. This is not 10% as the consultation suggests, and we question what level of growth over such a short period of time is truly sustainable.

x) Didcot and Henley have been excluded from any housing growth in the new draft plan. This is inconsistent with the strategic aims of the plan to allocate housing to all four of the main towns.

y) Henley. Page 76, para 10.6 refers to feedback that '*large housing allocations made to Henley could change the nature of the town*' and Henley '*needs additional car parks*', and the plan does not propose to allocate any further homes, or any additional employment land at Henley. Precisely the same observations could and should be applied to Thame.

z) SODC's five year land supply deficiency is due to withdrawal of sites or late delivery of housing starts in Didcot, Wallingford and some of the larger villages, but instead of resolving those problems they are seeking to compensate by reallocating housing elsewhere.

aa) Thame's Neighbourhood Plan addressed the issue of large single development sites and overwhelmingly favoured smaller developments around the town to enable better assimilation of newcomers into the community. The concept should be continued in this Local Plan, not just in Thame but wherever possible.

bb) Smaller villages were let off totally in the Core Strategy 2027 so it is time for them to take more of the load now. Why are the smaller villages only being asked to provide 5% growth when they are the most in need of controlled growth to remain sustainable? The village school, shop, pub and bus services all depend on demand. Even very small villages and hamlets should be taking some housing – what happened to 'we're all in this together'.

cc) Villages. We believe there is a need to create a new category of medium sized villages. In the list on page 93 there are quite a few which are not "small" and should be able to sustain more than the suggested 5% growth e.g. Garsington, Stanton St John, Horspath, Stadhampton, Tetsworth and Dorchester, and undoubtedly others that

we are not so familiar with.

dd) We are concerned to see Moreton listed under 'other villages'. Are SODC unaware that Moreton is a part of Thame Civil Parish and within the defined area of Thame's Neighbourhood Plan, or does this refer to another village?

ee) There are some special cases where higher numbers can be justified to address local infrastructure needs, such as Watlington (desperate for a by-pass) and Berinsfield (in need of regeneration), and we remain adamant that SODC should speed up their decision about new council offices and release the Crowmarsh site for housing allocation.

ff) We strongly disagree with the fact that that the known windfalls in Thame have been used to benefit the whole of the plan area, rather than to be used against the specific proposals for Thame. i.e. top-sliced rather than bottom-sliced. SODC have the data to enable bottom slicing, but have chosen not to.

gg) Strategic Objectives. There are 24 objectives listed, not one of which refers to the character and heritage of market towns.

hh) There is no mention of the proposed approximately 5,550 new dwellings in or close to Haddenham, (in a separate District/County) which will add an extra burden on all of Thame's infrastructure, but not provide for it. The Local Plan should specifically provide for that infrastructure, or it will not be sustainable.

ii) It is totally unacceptable that Aylesbury Vale identifies Thame as a growth town and use that as an excuse to dump 1000+ new homes in Haddenham, plus the threat of a new settlement. They cannot be allowed to piggy-back our already overstretched infrastructure.

jj) Aylesbury Vale. Page 5, para 1.4 states that '*we have and will continue to work with our neighbouring councils on cross boundary issues*'. However, there is little evidence of engagement, cross border cooperation, or joined up thinking between SODC and Aylesbury Vale.

kk) Aylesbury Vale. Page 25, para 4.13 states '*understanding the nature of our towns and villages and how they inter-relate and link with places outside the district is vital*'. Again, there is little evidence of engagement with Aylesbury Vale.

ll) Infrastructure Provision. We are amazed at the Infrastructure Provision Policy (page 56) that planning permission without infrastructure provision will only be refused as a last resort. It should be first resort. If it's not viable without relevant infrastructure mitigation, it shouldn't be built.

mm) Thame Town Council held a public meeting on the consultation on Thursday 4 August 2016, with more than 300 people in attendance at St Mary's Church – standing room only. The general consensus appeared to be that there was great concern at what was being proposed for Thame, in relation to both the threat of extra housing numbers and that required infrastructure must be provided ahead of housing. We have a record of all comments made if that is required.

nn) Page 18, OBJ 4.1 is to '*ensure that essential infrastructure is delivered to support our existing residents and services as well as growth*', which implies that the plan will address current infrastructure deficiencies as well as new infrastructure needs, yet

there is no further information or Infrastructure Delivery Plan.

oo) Infrastructure. Page 78, para 10.13 acknowledges Thame's *infrastructure deficiencies such as 'secondary school at or close to capacity', 'provision of health services needs to be improved' and 'lack of leisure and community facilities'*, and on page 79, para 10.15 refers to the need to *'improve car parking'*. Again, these points are not addressed further but we are still expected to accommodate extra homes.

pp) Following the numbers allocated in the Neighbourhood Plan, and the faster than anticipated delivery, Thame's resources are heavily stretched. Town centre parking, GP facilities, school capacity, etc are all under pressure, and we are particularly concerned about secondary school capacity and Thame's already inadequate sewage infrastructure (Oxford Road concerns and Lashlake evidence).

qq) There needs to be clearer definition of school requirements in Thame, both primary and secondary, taking into account the demand from outlying areas.

rr) Paragraph 10.12 implies that Thame has a further education institution. It doesn't.

ss) Transport. Page 52, policy iii) seeks to *'ensure that the impacts of new development on the ... local road network ... are adequately mitigated'* and policy ix) promises *'a comprehensive approach to the provision of car parking aimed at improving the attraction of our town centres'* and these are further underlined on page 54, para 7.6 which promises *'upgrades to surrounding highway networks'* and *'better approaches to car park provision'*. Yet there are no specific proposals in the plan.

tt) Office space. It is not clear whether Thame is being proposed for increased office space as part of its suggested employment land increase. There is a known unmet demand for modern office space in Thame.

uu) Employment. Page 48, para 6.20 includes 1.6 ha for industrial use in Thame, yet on page 80, para 10.17 this becomes 2.5 ha. This discrepancy is not explained.

vv) We agree that Chalgrove is the preferred site for a new strategic community ahead of Harrington. However we also strongly believe that new strategic community does not need to be limited to one site. It is disappointing that there is no proper analysis of the other 5 potential sites, but we believe that housing should also be allocated at Grenoble Road.

ww) We note that the emphasis of the options is on green field delivery as opposed to the more sustainable brown field option. Paragraph 111 of the NPPF encourages use of brownfield land.

xx) We believe that there should be some mention of a potential Unitary Authority and the impact that may have on the Local Plan.

I would be happy to provide further detail on any of the above 50 points if further clarity is needed to aid their understanding.

Regards

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