



Councillor Susan Brown
Chair, Oxfordshire Growth Board
Town Hall
St. Aldate's
Oxford
OX1 1BX

12 July 2018

Dear Councillor Brown

The Oxfordshire Housing and Growth Deal 3 Year Housing Land Supply Consultation

Thank you for inviting Thame Town Council to comment on the flexibilities agreed to in housing land supply under the Oxfordshire Housing and Growth Deal.

Regretfully, Thame Town Council is unable to agree the proposed temporary 3-year housing supply requirement for Oxfordshire. The Town Council has several comments to make with regard to the flexibilities offered.

The Town Council:

- is unable to agree to any plan that is extrapolated forward from the current draft South Oxfordshire Local Plan. This plan is flawed, and is also likely to require significant change to ensure it is compliant with the revised NPPF;
- is unable to agree to work alongside a joint planning authority that is without terms of reference;
- is unable to agree to be subject to a Joint Statutory Spatial Plan that is similarly without terms of reference in terms of its scope, objectives and expected outcomes;
- cannot agree to a deal that covers an Oxfordshire-specific housing delivery test, without any forward knowledge of what that will be;
- is conscious of the impact that the choice of corridor for the Oxford - Milton Keynes – Cambridge Expressway will have on the contents of any joint development plan.

This is the first time that Thame, and every other parish and town council across Oxfordshire, has been invited to comment on any aspect of the Oxfordshire Growth Deal. The principle was not put into the public domain until the agreement had practically been signed by the constituent parties. Against this background, Thame finds itself being asked to support the principle of housing land and housing delivery flexibilities. This appears to be a means of establishing a grass-root endorsement of the Growth Deal that does not exist. The Town Council is simply not in a position to provide any endorsement; there are too many unknowns that will directly impact on the development of Thame and the villages that use it as a prime service centre.

The Oxfordshire Growth Deal itself is dependent on certain milestones. Among others, one is the delivery of a unifying, Joint Statutory Spatial Plan (JSSP) that builds upon the homes proposed or allocated within existing draft or adopted Local Plans. The Town Council has fundamental objections to the assumptions made through the formula-based housing allocation methodology within the proposed South Oxfordshire Local Plan. This methodology was similar to that recently rejected by the Vale of Aylesbury District Council within their own Local Plan, in favour of a capacity-based model. The Town Council also has concerns about its lawfulness and soundness. It is likely to require significant alteration to ensure it is compatible with the revised NPPF, due for publication in the next few weeks. The Town Council is, therefore, unable to agree to a proposal to extrapolate forwards from the current draft South Oxfordshire Local Plan.

Both the South Oxfordshire and Aylesbury Vale Local Plans are being brought forward without any recognition of the role that Thame plays. The border with Buckinghamshire is within 350 metres of Thame's High Street and yet no discussions have taken place on the impact of the existing, proposed allocations, yet alone those emerging from the expected quick reviews of both Districts' plans. The Oxfordshire joint planning authority will have the remit of meeting Oxfordshire's needs, using a methodology that has yet to be drafted and consulted on; while Aylesbury Vale will be reacting to the national OAN methodology. With Aylesbury Vale's expected housing target to double through this methodology for calculating housing need, it is known that our neighbouring parish – who solely rely on Thame as a service centre – could more than double in population within the next plan period to match that of Thame, an extra 8,500 people. The expectation locally is that Thame will simply be treated by both authorities as a potential repository for further growth, without thought of any combined impact.

The joint planning authority that will be required to deliver the JSSP does not yet have terms of reference and, it appears, is not close to formation. Similarly, the JSSP itself is also without terms of reference. The scope, scale and ambitions of the JSSP are unknowns; the Town Council is unable to act in any way that gives validation to any plan without prior knowledge of even what its aims and objectives will be.

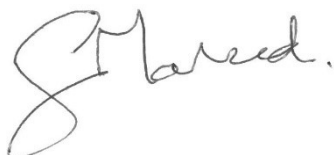
In signing up to the 3 year housing land supply agreement, it is not known if the Town Council would also be automatically agreeing to accept a variation of the Housing Delivery Test for the Oxfordshire area. Again, without knowledge of details, the Town Council cannot commit itself, even if it is suggested the flexibilities granted will be favourable.

Thame's ring road is one of the few definite parts of the three corridors being assessed for the route of the Oxford - Milton Keynes - Cambridge Expressway. This route in itself will have the ability to fundamentally change the relationship Thame has with the wider region. As recently expressed in a letter to Chris Grayling, Secretary of State for Transport, due to the paucity of evidence available within the public domain, the Town Council is unable to even begin to assess what benefits or drawbacks this would bring to the immediate area. We find ourselves in good company; England's Economic Heartland, a partnership of eleven local authorities and Local Economic Partnership groups, are themselves unable to express an opinion on the choice of expressway corridor, in spite of having been tasked by the Treasury to examine how communities not directly on the route can benefit from it (letter to the Secretary of State for Transport, 20 April 2018).

Furthermore, the Town Council believes that the decision to develop the choice of corridor and route of the Expressway through the NSIP route will lead to a regional land use plan being established through the back door, outside of the required sustainability appraisal process. This is both flawed, and apparently unlawful, and could well endanger the future JSSP.

Please do not hesitate in contacting us, should you like us to expand of any point raised above. The Town Council is fundamentally against endorsing or being signed up to committing to a wholly unknown future, prey to further agreements and deals.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Markland', written in a cursive style.

Graeme Markland
Neighbourhood Plan Continuity Officer