

25/03/2019	Thame Town Council's Response to Introducing the Oxfordshire Plan 2050
Section / paragraph	Reference and comment
Draft Vision	<p>JSSP Reference 71055.</p> <p><b>JSSP question: Does the draft vision meet your aspirations for the future of Oxfordshire?</b></p> <p>TTC answer:</p> <p>Yes. The Vision is supported due to its recognition that:</p> <ul style="list-style-type: none"> <li>• Housing should be secure and within reach of all;</li> <li>• Benefits such as healthy lifestyles and sustainable travel options are part of the vision for both existing and new communities;</li> <li>• Enhancement of the skills and wellbeing of residents is sought.</li> </ul>
Economic context	<p>JSSP Reference 739.</p> <p>"Oxfordshire has one of the strongest economies... one of only three net contributors to the treasury". You reference the Oxfordshire Housing and Growth Deal - Outline Agreement (Nov. 2017) MHCLG as the source of this statistic. That document does not, however, quote the source of this data. Please either establish the source, or remove the reference.</p>
Economic context	<p>JSSP Reference 780.</p> <p>This is a helpful summary of the challenge facing those seeking affordable housing near to their place of work. Thame has previously enjoyed high numbers of local residents working within the immediate area. Changes in housing affordability, plus Local Plan allocations and windfall development has led to a trend toward the outward commuting of new residents and the inward commuting of those who work in the area but cannot afford to live here. Air pollution is only monitored on one route into Thame, but this has been rising since 2013 and now exceeds permitted levels (<a href="#">Diffusion Tube 162</a>).</p> <p>The District Councils allocate "small", i.e., non-strategic housing allocations to the market towns and large villages in order to ensure their long-term, 5-year supplies of housing land. In Thame's case, this has meant an extra 1,551 homes since 2011. When added to windfall development this means an additional 25% of housing stock for Thame, across two local plans. With the focus of the District Council teams primarily taken by responding to the Oxfordshire Growth Deal and the future Oxfordshire Plan, there is significant concern that developers will continue to steer unsustainable growth towards the known, established housing market areas, to an extent aided and abetted by the District Councils nationally-driven need for a 5-year supply of housing land. This can only reduce investment across new communities and major urban extensions.</p> <p>It is therefore essential that the Oxfordshire Plan recognises the complex issues facing communities away from the main proposed growth areas. District authorities should be required to either pay equal attention to the impact of growth on existing communities, or ensure that new developments and urban extensions can provide both a 5-year housing land supply while satisfying the Housing Delivery Test.</p>
Aspiration 1 – Protect Environmental Quality	<p>JSSP Reference 797.</p> <p>Objective 1: This Objective, as written, inadvertently suggests that in order to maintain and enhance the historic built and natural environment strategic investment and high quality design, i.e., development, will <u>always</u> be required. It does not separate the tension between short-term gain (through development that helps preserve a built or natural asset) against the long term gain (where the development itself impacts on in how attractive the asset is perceived, in turn affecting the County's visitor economy).</p>

	<p>It would be helpful to rephrase this Objective to always seek the preservation and enhancement of assets, which <b>might</b> include development as an enabler.</p>
<p>Aspiration 2 – Strong and healthy communities</p>	<p>JSSP Reference 822.</p> <p>Thame has been, like many market towns, remarkably self-sufficient in employment terms; however, with over 98% of local employment land and buildings occupied, and over 650 jobs' worth of office space alone lost through permitted development since 2011, it is clear that the provision of employment floorspace has become unbalanced.</p> <p>The Oxfordshire Plan needs to be extremely clear that a healthy balance of employment opportunities and housing is required of Local Plans. With the focus of the District Council teams primarily taken by responding to the Oxfordshire Growth Deal and the future Oxfordshire Plan, there is significant concern that employment and travel to work matters will be left to chance in the market towns and larger villages, away from the major growth allocations.</p>
<p>Aspiration 3 – Support economic growth: Objectives 5 and 6</p>	<p>JSSP Reference 829.</p> <p>Objectives 5 and 6: Thame Town Council would recommend caution when deriving economic growth figures and policies for the entirety of Oxfordshire.</p> <p>Thame has not had one vacant retail unit on its High Street for approaching three years and currently, every shop across the Town is occupied. We have retained a good number of independents and will, through the combined work of our Market Town Coordinator and our local retailers, plus targeted policies in our revised Neighbourhood Plan, continue to encourage the growth of town centre businesses.</p> <p>Over 98% of the employment units in Thame, and its surrounding area, are occupied. We are working with our local businesses in order to establish needs through the revision of our Neighbourhood Plan.</p> <p>It is certain that other towns and villages across Oxfordshire are similarly thriving. Careful consideration should, therefore, be given before suggesting policies designed to be introduced for the purpose of consistency into District Local Plans as there exists the possibility of undermining local economies through policies that do not fit local circumstances.</p>
<p>Aspiration 4 – Improve housing availability: Objective 7</p>	<p>JSSP Reference 833.</p> <p>Objective 7: The Housing Topic Paper declares over paragraphs 17 - 20 that the housing need assessment will look at the supply of affordable housing in line with the Government's NPPF definition and come to conclusions on the number of affordable housing needed. This will, it is stated, develop a framework for affordable housing provision across Oxfordshire.</p> <p>Is the intention to apply a single affordable market need and policy over the County? The full intention was not made quite clear within the Topic Paper. It is essential that Local Plans retain the flexibility needed in order to meet and react to changing local affordable needs.</p>
<p>Aspiration 4 – Improve housing availability: Objective 8</p>	<p>JSSP Reference 836.</p> <p>Objective 8: It is difficult to impose single standards for needs across the whole County. For example, Thame, in its role as a market town, is undertaking an assessment of needs with its neighbouring parishes who use Thame as a service centre. Early indications are that local residents are trying to remain within their own communities wherever they can, through adapting their existing homes, rather than seeking homes elsewhere.</p>

	<p>The provision of new homes that can be readily adapted to changing circumstances is, therefore supported. It is suggested, however, that flexibility be given to any Oxfordshire-wide housing needs policies to provide for very local circumstances.</p>
<p>Aspiration 5 – Improve connectivity and movement: Discussion point 2</p>	<p>JSSP Reference 710290. <b>JSSP question: Do you feel that we have identified the right aspirations for Oxfordshire?</b> TTC answer: Unsure. Objectives 9 and 10: Thame Town Council supports the principle of these objectives but does not believe that technology will replace much of the way we live today. Schools, for example, will continue to require students to be in a single place and at a single time, indefinitely, and that will continue to effect the lives of their parents and carers.</p> <p>The Town Council, as a market town that reaches tens of thousands of individuals for food and goods retail, health, education and social functions, is aware that passenger vehicles will remain a factor for the foreseeable future. The Town Council therefore welcomes initiatives that encourage walking and cycling and that improve public transport provision. Mass rapid transport systems will, however, only be beneficial or cost efficient in concentrated areas or in the connection of similar areas.</p> <p>It is, therefore, essential that potential improvements in public transport is not seen as an excuse to enable development that would remain less sustainable than other locations. Development should be directed towards locations that can be made self-sufficient for most functions via walking or cycling; and only through connection via public transport for non-common journeys. It is not desirable to proceed on any assumption that future or existing technology will always be able to make commuting or common journeys sustainable, or affordable.</p> <p><b>JSSP question: Where do you think the balance should lie in prioritising these aspirations?</b> TTC answer: The balance should lie with enabling walking and cycling for most journeys, including school, work, shopping, etc. This ties in with objectives and aims in improving health and mental well-being, reducing carbon emissions, improving opportunities through decreased living costs, etc.</p> <p>If existing and new communities cannot live this way by 2030, let alone 2050, then the plan will have failed. The best way this can be achieved is through identifying existing and future locations where single secondary schools and employment can be provided as these communities tend to be both walkable, and self-sufficient for most purposes. Thame is one such community now. The Town is currently walkable for most residents for most purposes and has previously enjoyed high levels of local employment. It is at risk, however, of being swamped by uncoordinated development from both its own District and neighbouring authority area (the adjacent County boundary is within a 5-minute walk of the High Street, with over 1,200 homes allocated in the villages that use Thame as a service centre). This, coupled with the 1,551 homes Thame is and must find space for, risks turning an excellent, sustainable market town into a sprawling car-driven conurbation of some, too small for major rapid transport, too large for sustainable travel.</p>

<p>Aspiration 5 – Improve connectivity and movement: Discussion point 3</p>	<p>JSSP Reference 710293. <b>JSSP question: Do you feel the draft objectives are appropriate for the plan?</b> TTC answer: Yes. On the whole, the proposed Objectives are sound and sensible. It is essential though that these result in well-balanced policies that drive major growth to locations that result in no significant net gain in inter-town travel for daily functions.</p> <p><b>JSSP question: Are there any changes or other objectives that you would like to see? Should they be bolder? Or more specific?</b> TTC answer: Yes. Certainly, bolder. With the levels of growth ultimately proposed, the Oxfordshire entity, and the wider Ox-Cam Arc group of authorities are in effect the largest customer of housing and transport technology in the UK, possibly Europe. It gives an excellent opportunity for Oxfordshire to drive forward the development of technology for homes and transport. Thame's Community Land Trust, for example, in establishing choices for construction technologies has established there is no UK manufacturer of cross-laminated timber (structural timber). This technology will come to the UK, and it could be provided from within Oxfordshire.</p>
<p>Potential spatial scenarios: Discussion point 4.</p>	<p>JSSP Reference 710296. <b>JSSP question: Do you agree with the commentary relating to the spatial scenarios illustrated, or do you think there are important considerations we have missed?</b> TTC answer: No. The Housing Topic Paper states that the Plan is likely to focus on development of significant scale, such as that needed to provide a new secondary school or major infrastructure project.</p> <p>The emphasis should be changed to "only" focus on development of significant scale that can deliver a conurbation that can walk or cycle for daily needs, i.e., schools, work, food shopping, etc. that can be interconnected with major conurbations via rapid mass transport. This will enable sufficient flexibility to enable existing larger villages or small towns to grow, but will also hard-wire in the need to produce truly sustainable new communities. It will prevent less sustainable alternatives such as "green villages" consisting of a few hundred homes, with perhaps only single primary schools and single shops being brought forward through the revision of Local Plans.</p> <p>As ultimately, the choice will effect and perhaps be effected by the final routes of east-west rail and the Expressway, and by any rapid transit that can be retro-fitted to existing routes, this avoids for example the angst about worrying now about string settlements versus spoke and hub.</p> <p><b>JSSP question: Are there any spatial scenarios you think we should avoid (please provide reasons if you can)?</b> TTC answer: Avoid intensification of development within existing suburbs; intensification of city, town and district centres; dispersal. Intensification is supported, but cannot be relied upon to deliver the growth you are proposing in any appreciable timescale unless you can commit to rapid transit next to or through the associated conurbation. No other form of development should be discounted from being assessed for providing sustainable communities, other than dispersal.</p>

<p>Infrastructure considerations: Discussion point 5.</p>	<p>JSSP Reference 710297. <b>JSSP question: Do you agree with the commentary relating to the main infrastructure issues?</b> (note: answered in “any other comments section due to faulty text input box). TTC answer: No. Thame Town Council has, like other authorities, seen considerable interest in the provision of Extra Care housing within Thame. This has been solely driven by the private sector and we have had no guidance from either the Joint Health and Wellbeing Board, or the local CCGs and NHS trust. The Town Council is not, however, receiving interest in these schemes from the public, who are more interested in remaining within their own homes. The private providers try to obfuscate with various models claiming to be distinct from others. With the absence of leadership, and with Thame's existing Extra Care scheme seeming sufficient for the moment, we would welcome continuing engagement in establishing future needs for older residents.</p>
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