

JOANNA WALLACE
INDEPENDENT ASSESSOR

THE INDEPENDENT ASSESSOR
C/O LINK SCHEME
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Cassie Pinnells
Community Services Manager
by email to cassie.pinnells@thametowncouncil.gov.uk

29 July 2025

Dear Cassie

I have now completed my investigation into your complaint on behalf of Thame Town Council, about LINK's assessment of Thame in regard to a banking hub.

1.0 My review of your Complaint

My role as Independent Assessor is to consider your concerns about LINK's decision that Thame does not meet the criteria to have a bank hub; to do that I carry out a review to ensure that LINK has performed its role in assessing the access to cash options for your community correctly, and in line with the relevant criteria. Those criteria were agreed by the major banks to meet the relevant Access to Cash legislation described in FCA PS24/8 and are assessed by LINK as the coordinating body appointed by the FCA. As IA I am not able to vary or impose an alternative view to those – only to check they have been applied correctly and as described to Thame.

I have looked in detail at the materials relevant to your complaint, reviewed LINK's assessment of your application, and visited Thame myself on Saturday 5 July 2025. I have noted some of those records that speak to my adjudication of your complaints below, but to prevent case reviews becoming too long I don't note everything I see, unless it influences the facts of the case or its outcome.

In your complaint you raised a number of specific disputes, which in turn led you to say LINK's assessment of Thame was flawed - I will look at them in turn.

1.1 You say **Thame is wrongly categorised as urban, when it is a significant rural hub**, and that **population figures for Thame and its dependent hinterland are massively understated**

I will address these issues together as they both relate to population numbers and how they are counted. LINK's assessments for all locations in the UK are based on the same single CACI proprietary data set, referred to on LINK's website as 'a database of every high street'. As IA I look to check that these data have been used accurately for a community, but I do not have any remit to change the data that are used from that the database holds, as use of it was part of the agreement to the process overall by the major banks and LINK when the assessment scheme was established, in line with FCA PS24/8.

You told me LINK's assessment said that 10,434 adults live near Thame High Street while 16,831 live in the 'local area' and questioned those figures as you said the population of Thame Parish in the 2021 census was 13,273 and that you would add to this Thame's dependent villages, giving a total population of 41,907.

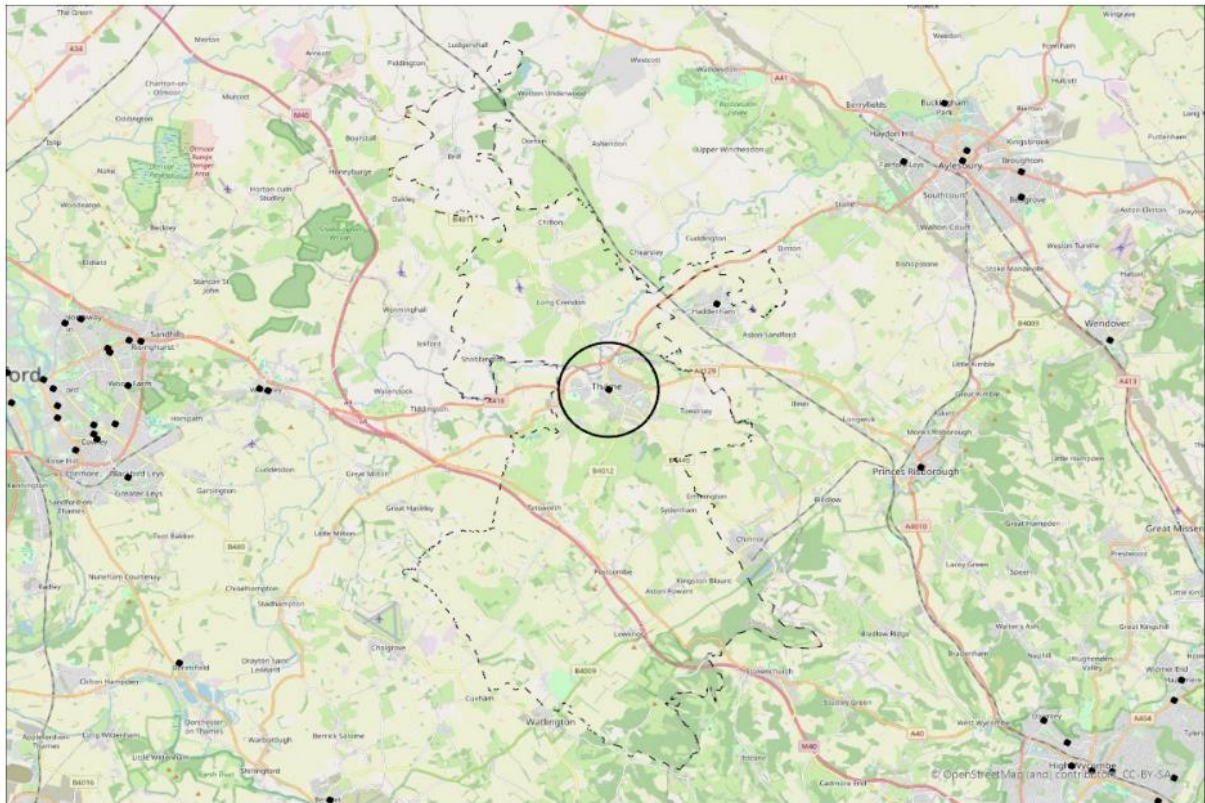
Taking the concern about the consideration of Thame as an urban area first, I asked LINK to clarify the basis on which they categorised any community they considered as urban or rural under the assessment process. The definition LINK use is that '*For an area to be classed as Urban in England, it needs to belong to a built-up area of at least 10,000 people.*' Whilst I understand there are other contexts in which Thame is considered a rural community as you described, this is the definition used in the cash assessment for every community in England, and given that all the numbers in discussion are greater than 10,000 I am reassured it is correct in this context for Thame to be assessed as Urban.

Turning now to your concerns about the population numbers, LINK assessments use very specific definitions of some terms which do also have a general meaning, so 'local area' and 'retail centre' have a specific assessment definition, which can lead to confusion if not fully explained. LINK have provided me with the local area map below, generated from the database they use.

In the map, the circle is the one-mile radius which defines the Thame Retail Centre (how LINK define 'near the high street'). The area of that will be around 3.14 sq miles, which is a smaller area than the Census Parish area of 4.89 sq miles. This seems a plausible explanation for LINK's slightly smaller 10,434 compared to the census 13,273. I am assured from the CACI data that the 10,434 is correct.

The small black dots on the map are Retail Centres as defined by the database, and the dashed line is the Local Area. A Local Area (in LINK's use of that term) shows the population for whom a particular Retail Centre is the **nearest option**. You can see that has a very irregular outline and of note, Haddenham is defined as being its own retail centre, so the dashed line for Thame excludes that. Chinnor is also categorised as being closer to Princes Risborough retail centre than Thame and is also not counted. Tiddington and Waterstock along the A418 are also excluded as they are associated with retail centres at Wheatley. I appreciate that you may think

those other dots don't 'feel' like retail centres and are rural village which look primarily to Thame for retail and banking, but that is the way the single database assesses all communities across the whole of the UK, and on which the assessments are based. This explanation may help you to understand why the 16,831 'local area' figure differs so much from that you've put forward – I am assured from what I have seen that it is the relevant figure for LINK to consider as Thame's retail centre population.



1.2 You say the Retailer numbers are understated for the catchment area

You said the count carried out in February 2025 totalled 161 retail premises and gave the breakdown including shops, service businesses with retail premises, pubs/clubs, restaurants, cafes, takeaways and charity shops. You also said there was a weekly market and various other outdoor retail festivals and events and referenced the shops and retail premises in the adjoining villages. I noted from my own visit that Thame has a real mix of independent businesses including shops and cafes along with the more usual high street names.

I asked LINK for clarification of how the retailer count had been arrived at, and they first provided the definition of 'relevant retailers' which are considered in their assessments. These are considered 'relevant' as they are more cash reliant, and the count includes only those within the 1-mile radius and so will not include retailers in the wider parish or other villages. The list includes

- All convenience retailers (including bakers, grocers, butchers etc. – but excluding cash & carry);

- All clothing and footwear retailers;
- Department Stores, Stationery & Card Shops, Florists, Gift Shops, Pawnbrokers & Second-hand Shops, Discount/Charity Stores;
- Chemists;
- Beauty Salons, Hairdressers;
- Launderettes & Dry Cleaning, Shoe Repairs/Key Cutting;
- Bookmakers; and
- All eating and drinking outlets *except* Restaurants

LINK's desk top assessment in April 2024 counted 85 relevant retailers, though the visit only 73, the desktop reassessment in August 2024 counted 86. Whilst exact numbers do shift around as retailers come and go, the critical point is that using the criteria of **both** relevant retailers **and** the 1-mile radius, Thame by any of those numbers constitutes a 'large' location of over 70 relevant retailers. Critically, to count in the next category up, as a 'very large' centre for assessment purposes, Thame would have to have **both** 100+ retailers **and** 30,000+ pop within 1 mile, which is very clearly not the case. As such whilst specific relevant retailer numbers may vary with time, when the 1-mile radius and the criteria of relevance are considered, Thame is clearly a 'large' centre and was assessed as such and is far short of the next assessment category of 'very large' centre (by around 20k population in the 1 mile radius).

1.3 You say **the distance to nearest banks are understated, as straight-line distances have been used** and that **the age profile for Thame suggests there is an unrecognised need for the provision of assisted cash.**

I will address these issues together as both lead to a 'red/amber/green' rating for a community which determines certain aspects of the assessment process.

The nearest full-service bank LINK has considered is the Santander at 20-22 High Street Aylesbury and LINK assessed that as being 6.48 miles away and a 30 minute bus ride. That distance is a straight line as that is how all such distances are measured for assessments. In terms of categorisation, given Thame is considered urban, it was 'red flagged' for proximity to a full-service branch on three counts - the public transport travel time is longer than 15 minutes, the bank is further than a straight-line distance of a mile and the fare is greater than £2.50. As such, whether the distance is 6.48 or 9.8 miles as you say (or 10.5 miles as suggested by the AA Route Planner, via the A4129 and A418) makes little difference as all measures already 'red flag' this criteria and it can't be weighted in the assessment as a concern more heavily than that.

Turning to age profile, the CACI data indicated that 23% of the Thame population within the retail centre are over 65. A community is 'red flagged' for age if more than 21% are 65 or older, so I have seen that Thame was correctly red flagged by LINK on this dimension. As such Thame had two red flag ratings from the desk top

assessment which meant it warranted an in person visit, which was carried out by LINK in April 2024. This was entirely in line with the assessment process and as applied to all other UK communities. As a final note, in regard to assisted cash, the Nationwide branch does provide face to face services for personal customers five and half days a week, so that need can currently be met.

1.4 You say **the weighting given to Nationwide is not appropriate as it does not serve businesses or charities, that the description of the number of ATMs in the town is incorrect – they aren't 'numerous' and that the ADS solution is a distraction from the core argument that Thame should have a banking hub**

I will address these issues together as they are related, given they collectively speak to the cash access and deposit services available in Thame, and which are considered in LINK's assessment.

The Thame branch of Nationwide is open 9.00am to 4.30pm Monday to Friday and 9am to noon on Saturday, and it has a 24/7 ATM. LINK consider this branch to be a 'non full-service branch' (it has generous opening hours but provides for personal customers only). Whilst you are right that it doesn't provide services for business or charities, it is considered a part of the overall assessment of cash services in a community and has correctly been considered as such.

I saw three ATMs when I visited - outside Morrison's, the Nationwide and the ADS at Boots. You note two others at Asda Express and Thame BP, though I didn't see those myself. You say the ATMs are often out of cash (local people I spoke to agreed and said that often happens on market day). LINK have correctly assessed Thame on these ATMs, and I note from records of your complaint with LINK that they have previously committed to be in touch with the ATM's providers regarding them being empty (though I am happy to flag that to be followed up again in my recommendations as I am unclear from local anecdote if that has now improved or not).



I note that the ADS machine in the outer wall of Boots is now up and running and I watched it being used by a number of customers when I visited on 5 July 2025 – I wasn't able to tell whether they were using it for deposit or withdrawal and I agree there is little information apparent around it to signal its deposit use, beyond the usual ADS branding and labelling as 'Free Cash Withdrawals and Deposits'.

The ADS solution was the result of the visit and assessment by LINK in April 2024, triggered by the closure of Lloyds, which recommended Thame needed additional deposit facilities – business had only the Post Office for deposit and

as a 'large' location another facility for business note deposit was indicated. A hub was not indicated at the time as the Nationwide could provide for personal customers and was open 5.5 days per week and the Post Office, with three secure tills, was considered to have extra capacity. This was correct based on the algorithm at the time. I do understand there were some delays in the ADS then being installed and operationalised.

1.5 You say **the rating of the post office in Thame should be 'unsatisfactory'**



Whilst the assessment in April 2024 recorded there were three secure tills in the Post Office in the Morrisons, it was noted that there was only one staff member working and there was a queue, though its capacity was rated green – so the ability of the Post Office to provide proper service was staffing-dependent. When I visited on 5 July 2025 there was also only one till staffed and on each occasion that afternoon that I dropped back in to monitor the situation there were between four and seven people waiting at any one time. I also note that the capacity status of the Post Office between times has varied between Green and Amber, and it is on the basis of these observations that I think additional consideration

should be given to the Post Office. The ADS solution was considered appropriate given a fully functioning Post Office - from your concerns, from the notes of LINK's in-person assessment and from my own observation (albeit on one day) I think extra consideration should be given to this.

2.0 Conclusion

From my review of LINK's assessment based on the documentation considered and my own observations of Thame from my visit, I have seen no error in the assessment process. The decision that the town should have an additional note deposit service, and the subsequent installation of that, was entirely in line with the criteria in use.

However, from my consideration of your submission and chatting to local people and shop and café owners when I visited, I make these additional recommendations:

- That LINK feedback to the Post Office that the potential offered by the Thame branch's physical capacity may not be being delivered and ask them to review that; and
- That LINK check that the ATM providers have taken all possible actions to ensure the ATMs remain stocked, especially on high cash demand days such as market day.

This letter concludes my review of your complaint and brings my involvement with your case to an end – my decisions are final, and I only re-examine if there is a material error of fact raised by either party which would lead me to a different decision. If you have such a concern, it should be raised within two months of the date of this letter - otherwise it only remains for me to wish you well and thank you for asking me to consider your complaint.

With kind regards

A handwritten signature in dark ink that reads "Joanna Wallace". The signature is written in a cursive style with a long horizontal stroke at the end.

Joanna Wallace OBE
Independent Assessor

Cc Donna Calero Head of Banking LINK
LINK Customer Relations