

THAME NEIGHBOURHOOD PLAN 2 (TNP2) REGULATION 14 CONSULTATION

EAST THAME RESIDENTS ASSOCIATION RESPONSE JULY 2023

The consultation is presented in the format below, with an online response form available to select one of the five options between 'strongly agree' and 'strongly disagree'. There is a single space to comment at the end. The prescriptive nature of this format doesn't allow for different elements of a policy to be supported or not supported, we have therefore chosen not to support some policies where there are concerning elements.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Summary of concerns. See detailed comments at the end
Proposed policies: Growth and Development						
GDH1a: Land south of Wenman Road	Yes					
GDH1b: Diagnostics Reagents	Yes					There must be direct access to this site from Wenman Road. Traffic should not be directed via the existing adjacent development.
GDH1c: Land at Windmill Road	Yes					
GDH1d: Land at Oxford Road	Yes					
GDH2: Windfall housing criteria					Yes	Serious concerns this policy allows for potential development on sites not in the plan.
GDH3: Housing type, tenure and mix					Yes	Serious concerns this policy won't deliver the 1 to 3-bedroom homes Thame residents need.
GDE1: Land at Rycote Lane	Yes					'Strongly agree' relates only to the site selection. The size of the allocation is excessive and should be reduced.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Summary of concerns. See detailed comments at the end
GDE2: Windfall employment proposals					Yes	This policy must be amended to stop potential large scale employment development on sites not allocated
GDR1: Cattle Market site				Yes		Intensification on previous plans. Conflict between the cattle market plan and other sections of TNP2 impacting on vitality of the town centre and the visitor economy by proposed removal of long-term parking
GDR2: Town centre uses		Yes				No mention of pubs as community assets.
GDV1: Visitor economy			Yes			This may open up the possibility of a hotel on any site around the town?

Proposed policies: Character and Place Quality

CPQ1: Design in response to local character					Yes	Part of East Thame is shown as Lee Park
CPQ2: Design principles for employment development		Yes				
CPQ3: Town centre design principles		Yes				
CPQ4: Self and custom-build housing		Yes				

CPQ5: Sustainable design and construction		Yes				
CPQ6: Street hierarchy			Yes			Mixed views on this one - too idealistic
CPQ7: Parking in residential areas			Yes			Parking allocation should relate to number of bedrooms.
CPQ8: Paving of front gardens					Yes	Policy likely to prevent most new dropped kerbs.
Proposed policies: Services and Facilities						
SF01: Community facilities and services		Yes				
SF02: Existing open spaces			Yes			
SF03: New open spaces			Yes			
Proposed policies: Natural Environment						
NEB1: Biodiversity			Yes			
NEC1: The Cuttle Brook Corridor			Yes			
NEF1: Flood risk and sustainable drainage			Yes			
Proposed policies: Getting Around						
GAAT1: Active travel			Yes			

GAP1: The Phoenix Trail			Yes			
GAA1: Alleyways			Yes			
GAPT1: Public transport		Yes				Policy needs more scope to compensate for loss of long-term parking
GAM1: Mobility hubs and EVs			Yes			
GATCP1: Town centre parking				Yes		Insufficient research has been done to support this policy which could have a major impact on the viability of the town centre.

Detailed comments

GDH1: Housing allocations

We have no issue with the allocations except a major concern with the increase of an additional 30 homes added to the Cattle Market site since the previous consultation.

GDH2: Windfall housing criteria

The criteria for windfall sites proposed in TNP2 is too relaxed and could lead to a proliferation in housing sites on top of those already allocated for development. The 3-year time period to allow windfall development if an approved site does not get planning permission should be removed and a longer period inserted (5 year?). Given the experience on other development sites it is patently too short a period and could undermine the integrity of TNP2 as well as exposing Thame to the jeopardy of excessive development.

GDH3: Housing type, tenure and mix

By specifying only 65% of new homes should be 1 to 3 bedroom this policy allows for the remaining 35% of new homes to be 4 to 5 bedrooms. Recent research has shown that Thame families require availability of 1 to 3-bedroom homes in order to remain in the town. 4 to 5-bedroom homes will simply attract more people to move into the town from outside and commute.

GDE1: Land at Rycote Lane

ETRA favoured the building of employment space on the Rycote Lane site given the site is not adjacent to residential areas and is closer to the M40 and A418, so **we are pleased to see that this site has been selected.**

However, we are concerned that the size of the proposed site (5.5 hectares net employment space) is well in excess of what is required by the Local Plan (3.5 Ha) and that the proposals are driven by external demand rather than Thame's needs, given:

- **There is no unemployment in Thame with the number of jobs in Thame already significantly exceeding the working age population.** The AECOM report, commissioned by TTC, confirms Thame has a working age population of 7,410 people, significantly less than the total number of jobs in Thame which totals 9,250. Inward commuter flows already exceed outward commuter flows by 1,928 trips daily.
 - **The majority of businesses in Thame rely on a large proportion of their staff commuting into Thame.** One company interviewed as part of the AECOM report responded that 80% of its staff commute in for the likes of Aylesbury, Banbury, Bicester, Leighton Buzzard, Milton Keynes, Oxford and Didcot.
 - **Neither TNP2 nor AECOM report has provided any specific evidence that businesses in the town require new space or premises.** Rather than focus on developer aspirations, TNP2 should only allow development above the 3.5 Ha specified in the SODC Local Plan if a specific Thame business needs additional space and are ready to invest in new premises or have concrete plans to relocate.
 - **The justification for additional employment space in TNP2 seems largely based on the misguided perception that Thame has lost employment space over the 2011-22 timeframe.** In fact, Thame has only lost office space over this time but given there is no demand or appetite for developers or employers to invest in office space, there is no need to replace this lost space.
 - **In the 2011-2022 timeframe, Thame has seen vast expansion of B2 and B8 employment space** which are predominately large industrial/warehousing units (Windles, Groves, Christmas Hill, and the new Rycote M40).
 - **The AECOM report estimates an allocation of 80% warehousing and 20% industrial for the new employment space** which is difficult to understand given Thame's employment profile which is dominated by professional, scientific and the technical sectors. Neither is it aligned with Oxfordshire's aspirations for hi-tech growth.
- Further industrial/warehouse development in Thame will therefore only drive further inward commuting, HGV movements, more congestion and potentially greater car parking issues. This later point being exacerbated by proposals elsewhere in TNP2 to reduce long-term parking spaces. Therefore, residents will be adversely impacted by greater congestion, noise and loss of green space but will not experience any benefit from excessive development.

GDE2: Windfall employment proposals

The criteria for allowing 'windfall employment proposals' which would lead to additional employment development are too relaxed. These criteria must be revised to remove the notion that the windfall sites are 'additional' to the current proposed sites and the 3-year time period removed for planning permission and replaced by a longer period (5-years). Given the plan runs to 2035, and the experience on other development sites, 3 years is patently too short a period and could undermine the integrity of TNP2 as well as exposing Thame to the jeopardy of excessive development. The requirement for archaeological investigation further emphasises this point.

GDR1: Cattle Market site

Inadequate prior study has been made with regard to this area and a detailed approach to tackling this issue has not been seen. A study must take account of the following in order to avoid prejudice:

1. Thame is a service centre and the traffic problem from inward commuting for services or jobs is not addressed employment in the town is already running at 25% in excess of the working age population; some 2000 jobs in excess (source: Aecom)
2. The pressure on Thame will further increase by growth in the hinterland e.g. Haddenham is growing by >50% in its current plan. The burden of parking should not be allowed to fall on Thame residents via the expansion of on-street parking.
3. The implementation of the new parking scheme for Thame, instituted by Oxfordshire County Council, has yet to take place and its effects appreciated.
4. Thame residents are already undertaking some 60% of visits to the town centre by foot (Source: Hopper bus survey) with the principal exceptions being heavy shopping, health centre visits and for leisure facilities. Government aim is 50%.
5. Aspirations for pedestrianisation of the town centre and street greening have not been evaluated in terms of the effect on parking provision.
6. No consideration of the impact on the weekly market of the loss of all day parking for market traders has been included.
7. No evaluation has been made with regard to the impact on residents with children at Barley Hill School where the long-term parking area is heavily used at peak times. Consultation required.

CPQ1: Design in response to local character

The principles are acceptable, but Figure 18 shows a significant area of what has previously been designated East Thame as Lee Park. This error hasn't been corrected since the 1st consultation.

CPQ7: Parking in residential areas

Principles are OK but no mention of required number of spaces in relation to bedroom number (may be in SODC LP but link not working).

CPQ8: Paving of front gardens

Dropped kerbs only allowed if they don't reduce on street parking. This would stop the majority perhaps?

GAPT1: Public transport

Policy must ensure that public transport and park and ride can be integrated into a meaningful service to compensate for the loss of long- term parking. Needs more definition as to scope and coverage across Thame.

GATCP1: Town centre parking

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Additional Comments

1. Page numbering is all over the place and the index is made unusable. Hyperlinks to external documents not working.
2. Assets of Community Value - pubs are not listed? Cross keys is on a secondary town centre road where residential may be suitable on the ground floor
3. Policies lost from TNP on GP surgery and sport and leisure.