

Comments

South Oxfordshire Local Plan 2033 (11/10/17 to 30/11/17)

Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 21:32

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT1, STRAT2 and Paragraph 5.2

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is unsound as it is not consistent with national policy.

The District Council appear to be using the word “strategic” in a way that is not compatible with paragraph 156 of the NPPF.

Paragraph 16 of the NPPF states that communities involved in neighbourhood planning should “develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development”. Furthermore, they should: “plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan”.

Guidance tells the neighbourhood planning groups that NDPs must support the strategic development set out in the Local Plan and plan positively to support local development as set out in paragraph 16 of the NPPF (paragraph 004 ID: 41-004-20170728 revised 28 07 2017).

The Publication Plan appears to specifically exclude market towns and larger villages from meeting strategic housing need. Strategic allocations are limited to the four major locations of Berinsfield, Chalgrove, Culham and Wheatley. Specifically:

- 1 The Publication Plan refers to “strategic levels of growth at four locations... at Berinsfield, Chalgrove, Culham and Wheatley” in Paragraph 4.10
- 2 This is reinforced in Paragraph 5.3, which references determines that the strategic allocations are “central to the delivery of the Local Plan and to the achievement of our vision and objectives. As set out in our spatial strategy chapter, we propose three large scale developments and a brown field redevelopment opportunity...”.

- 3 A further source of housing supply is identified in the Publication Plan as being “small scale (non-strategic sites) to be identified through Neighbourhood Development Plans or identified in this plan” (paragraph 5.2 and table 5c).

Through the text outlined above, the District is suggesting that the housing proposed for the market towns and large villages lies wholly outside of the strategic need identified for the District, and of the core objectives of the emerging Local Plan. This does not align with Paragraph 156 of the NPPF, the first section of which states that “strategic policies (should) deliver... the homes and jobs needed in that area”.

Allocations should primarily result from strategic need. It is the role of the District to allocate the strategic development across all of the market towns and larger villages, following a sound sustainability process, as per paragraphs 156 and 157 of the NPPF and by the Strategic Environmental Assessment Regulations. The use of buffers to ensure a choice of sites is recognised, where proportionate; however, the District Council is promoting significant uplift, for the purpose of ensuring a 5-year supply of housing land, but has distributed this only to the market towns and villages. No OAN is directed to these settlements.

It is the function of neighbourhood planning groups to respond to the identified strategic allocations. The District state they are content to leave the detail of allocations to the neighbourhood planning groups. They should therefore allocate true, OAN-driven strategic development to areas of search within each neighbourhood plan area. The growth should be finite, unique to each neighbourhood plan area, and have been subject to an adequate sustainability appraisal process.

This is pertinent as SODC states that if sufficient progress is not made on meeting the numbers of homes directed to each of the market towns and larger villages (paragraphs 5.12 and 5.18, and Policies H3 and H4. Yet if the dwellings directed towards the market towns and large villages is not derived from strategic need, NPPF paragraphs 16 and 184 and NPG (Paragraph: 004 Reference ID: 41-004-20170728, revised 28/07/2017) indicate that the neighbourhood plan bodies will not have a duty to respond to them. These paragraphs tell us neighbourhood plans must be in general conformity with only the strategic policies of local plans that define strategic development needs. The reference within both the NPPF and the Guidance to “strategic development needs” must be taken as deliberate, and is there to ensure that NDP groups can choose to provide housing, employment and community needs in addition to OAN that reflect the vision, objectives and needs of the local community. The District are currently trying to force development that is not allied to OAN, at a level decided arbitrarily by the local planning authority, that is likely to cause harm to the local and wider community.

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The neighbourhood plan areas, which include the market towns and many of the larger villages, should only be allocated development identified as necessary, in line with paragraph 156 of the NPPF. This should be devised following the identification of the strategic priorities for the District, and a true assessment of the type and quantum of development required in order to meet each need. The allocations should be subject to a sound Sustainability Assessment process in order to ensure that development subsequently allocated does not cause harm.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 21:47

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Paragraph 5.9

Q3 Do you consider the Local Plan is Sound? No

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The Plan is not Justified.

Within paragraph 5.9 of the Publication Plan, the District Council refers to development that exceeds the requirement needed to meet the existing and future needs of South Oxfordshire and Oxford City.

The expected sources of housing supply to meet this demand show a total of 22,563 dwellings. This table does not, however, include the 1,925 homes sourced from new strategic allocations that the District believes will continue to be delivered after the plan period.

Taking the total shown in table 5c at face value, this gives a theoretical annualised supply of 1,025 dwellings per year over the plan period, 2011 – 2033. The District Council have built in a substantial buffer, some 250 units per annum over the annualised OAN. Coupled with historic delivery rates that indicate the District are underestimating delivery from the smaller villages, the District Council is likely to see annualised development beyond that deemed as harmful, and potentially toxic, within their October 2017 Sustainability Appraisal. Development was seen as likely to be harmful at 825 dwellings

per annum, and above (Chapter 6, and summary Table 6.3), only 50 dwellings per annum above that considered acceptable (775 dwellings per annum).

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The District Council must provide a buffer in order to provide a choice of housing sites that does not risk the delivery of homes on the ground exceeding that judged as harmful through the Sustainability Appraisal process. This will ensure the quantum and rate of delivery is sustainable, thus making the Plan sound.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 21:58

Status Draft

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Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Paragraphs 4.8 - 4.9

Q3 Do you consider the Local Plan is Sound? No

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The Plan is not Justified.

There is no evidence that the Town Centre of Thame requires further housing development in order to regenerate any part of its town centre. There are no vacant retail units within the town centre, and there have not been for almost 2 years. Any development required – on the Cattle Market site, for example - has yet to be fully assessed in terms of function and yield. In planning by theory, rather than hard evidence, there is the danger of providing too much housing and adding to parking congestion, pressure on local services, and the requirement for further community facilities such as community halls. This would harm the amenity and function of the Town.

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Remove reference to housing being necessary to regenerate the town centre of Thame. This would avoid directing growth to the town for a purpose that is wholly without merit.

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Comment by

Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 22:30
Status Draft
Submission Type Web
Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H3 and Paragraphs 5.11 - 5.13

Q3 Do you consider the Local Plan is Sound? No

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The Plan is not justified.

The reasonable alternative of testing and matching development to settlement capacity has not been explored.

With this in mind, there has been no attempt made, for example, to establish if any particular area could benefit from more, or less development in order to provide enhanced education or health facilities. Growth in community infrastructure is limited to that necessarily arising from the District Council's flawed housing and employment dispersal strategy, only.

Each allocation to the market towns and large villages is untested. The dispersal strategy was formed at Preferred Options stage, well before key evidence was reported. The first three stages of the Plan for Thame were based on a highly flawed assessment of each major settlement in the District; this was finally only corrected for the Publication stage. Despite the removal of key facilities such as a train station, a hospital and a cinema (none of which exist in Thame) the only result was an increase in the number of dwellings directed to Thame, allowing for windfall, completions and commitments. This does not suggest the District Council have produced a sound, evidence-led Plan.

Each allocation has been made based on the number of dwellings each major settlement had at the last census. The dispersal method is not consistent with national policy in that development and infrastructure is not being planned positively for, contrary to Paragraph 157 of the NPPF. There has only been scant consideration of harm, evidenced by the fact that very few recommendations for mitigation for any adverse effects are proposed, as should be through the Sustainability Appraisal process for the allocations across the District. For example, only Henley-on-Thames is mentioned in connection with air quality and Thame only receives a generic comment about possible impact on the physical character of the Town, not its facilities, community cohesion, or its role as a market town.

The Sustainability Appraisal only recognises access to services such as health and education but does not examine individually or as a group the potential for these services to grow within their current locations, or the capacity to provide new facilities. Policy STRAT1, bullet point 4 states that new homes, jobs, services and infrastructure will be provided within the market towns. The Publication Plan however only mentions the provision of jobs and housing development to each market town. The Infrastructure Delivery Plan appears to only suggest new or expanded facilities associated with combined Core Strategy/Local Plan growth; existing inadequacies are not mapped.

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if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A thorough assessment of the capacity of existing community infrastructure, which is formed into a discrete constraints layer or matrix should have been produced as part of the first stage of evidence gathering. This should be undertaken, now, and seek to correct missing data points (such as not recognising GP surgeries). The findings should be embedded into the allocation process to help inform the best development dispersal strategy. This would lead to a Plan that actively tackles infrastructure constraints on the basis of real need.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 22:44

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT1

Q3 Do you consider the Local Plan is Sound? No

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The Plan has not been Positively Prepared.

Thame is experiencing difficulty in helping deliver the infrastructure development necessary to support the existing, Core Strategy level of development. This includes, but is not restricted to a new community centre; health facilities; the movement of a primary school, and provision of further secondary school; new sports facilities; parking; employment and public transport infrastructure. The problem is the capacity of a small Town Council to drive forward several major projects at the same time.

Further growth in a short timescale will only exacerbate this issue, repeatedly made during consultations on the District Council's emerging Local Plan.

The only direct interaction with the District's Local Plan Team since the Local Plan preparation started was on 14 June 2016, where the District's senior planning staff and portfolio holder for Planning laid out the planned allocations of housing and employment for Thame. This was presented as a fait accompli. A visit from the District's Neighbourhood Plan Team 3 May 2017 reinforced the allocation. This was despite us stating our concerns about the capacity of key services providers within Thame to deliver services to the existing level of growth, let alone newly identified growth. We also identified key community facility infrastructure is struggling to meet current demand. The District's NP Team stated that if we wished to shape the scale of allocation, we would have to argue it at examination. No mention was made of the District's role in helping us provide further infrastructure, other than that achievable through further development. This is not planning positively.

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The Plan needs to be realistic in its expectations of the capacity of neighbourhood plan areas and recommend phased, or stepped allocations, with lower development in the earlier years, to help the Town Council bring forward infrastructure required by new allocations. This would ensure the Plan's strategy remains sustainable.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 22:50

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT1

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The Plan has not been positively prepared.

Only one mention is made within the whole Plan of authorities within Buckinghamshire, and this is in relation to TRANS1, Supporting Strategic Transport Investment. The border with Buckinghamshire is within 350m walking distance of Thame's High Street.

No other impacts of cross-border growth, in either direction, is mentioned. For example, the community health hub in Thame receives patients from across both Oxfordshire and Buckinghamshire, and is owned and managed by Buckinghamshire's CCG. No mention is made of any growth proposals within Buckinghamshire on this or any other service or facility. No impact on facilities is explored within the Infrastructure Delivery Plan arising from pressures from outside the area. There is no mention of the long-planned Thame - Haddenham Cycle Way.

The Vale of Aylesbury Local Plan is running to a virtually identical timetable to the SODC Local Plan; yet there is no recognition of the fact that Aylesbury is planning for 1,051 homes two miles away in the town of Haddenham, of which 600 are committed and 150, completed. The Vale name Thame as being the primary location for local services for the current and future population of this town. No expanded services are planned there and so it is expected that this growth will have a significant impact on Thame's services.

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The Plan must be amended to consider the impact of development that is both underway and planned within the Aylesbury Vale Local Plan.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 29/11/17 23:13

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Paragraph 5.12

Q3 Do you consider the Local Plan is Sound? No

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The Plan has not been Positively Prepared.

The one-year deadline given for neighbourhood plan revision in paragraph 5.12 and other policies is inadequate, given the resources of neighbourhood plan groups. This appears to be an arbitrary time period, suggested without any evidence it is either fair or effective in its purpose. In saying this, the Town Council are fully aware of the duty of neighbourhood plan groups to respond in good time to allocations in adopted development plan documents.

It has taken over 4 years and 4 consultation events at the same plan-making stage, Regulation 18, for South Oxfordshire District Council to consider finally preparing a pre-submission plan. Yet Thame, a border town with duty to cooperate issues to consider with its neighbouring authority and parishes, evidence to gather, and complex allocations to propose would be given one year to proceed through to examination from the time the Local Plan is adopted. This is against the backdrop of the County and District continually shaking off services and functions to the Town Councils (the County Council has even tried to suggest Thame could take over aspects of its transport plan function, which would be unlawful for us to do).

For smaller parishes, or poorly resourced neighbourhood plan groups, this deadline will be impossible to meet. This, together with the gun held against the heads of the smaller villages in the form of Policy H8, just seems to be a offering a cynical way that the District Council can wrest back control from neighbourhood plan groups.

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The Plan needs to be altered to reflect reality. The time period given for neighbourhood plan areas to respond to allocation needs to increase. One year could well be inadequate for Thame, with its cross-border issues. It is fair that the programmed delay should be in proportion to the allocation, so that the smaller community groups receive a longer period of time to react; else the Local Plan risk acting contrary to national policy in deterring new neighbourhood plan groups.

The time period recommended is at least 18 months for the market towns and larger villages; and at least two years for the smaller, and "other" villages.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 08:44

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H3

Q3 Do you consider the Local Plan is Sound? No

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The Plan is not Effective.

The minimum target of 1,155 homes is declared as a "collective" target. This means that shortfall in one market town will be expected to be picked up in the others.

This is wholly unacceptable. Subsequent strategic environmental assessments of sites, or other evidence may well significantly reduce the potential sustainable development at specific towns. The neighbourhood plan groups in these towns will seek to deliver genuine strategic need, in proportion to the infrastructure; and are also likely to increase all types of development in order to meet local need.

The District Council have described how the allocations given to each Town are made as a result of an assessment "to check the capacity of our towns to accommodate further growth" (paragraph 5.13). It cannot be supposed that this growth, if allocated on the basis of sound evidence, can be pushed to other NP areas without a further, specific test for sustainability. To do so may well disrupt neighbourhood plans during or shortly after their preparation.

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In order to make this Local Plan Effective, the word "collectively" should be removed from Policy H3. There is no basis to suggest a reserve site to take any unmet development that arises from the market towns and villages, as the allocations are, in any case, not based on OAN.

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Response Date 30/11/17 08:57

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Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H4

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not Effective.

The word "collectively" should be removed from the policy. The subsequent strategic environmental assessments of sites, or other evidence, may well reduce the development expected at specific large villages. This is likely to be the case, as the allocations have been made with an arbitrary methodology. With the current wording it would fall to other larger villages to deliver any shortfall through planning applications as joint responsibility is implied. It cannot be supposed that this growth, if allocated on the basis of sound evidence, can be pushed to other NP areas without a further, specific test for sustainability.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will

need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The word "collectively" should be removed from Policy H4 in order to produce a sound plan.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 09:07

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT1

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan has not been positively prepared.

Sites in the most recent (October 2017) SHELAA for the Thame area show the following sites are suitable for:

- 1 Site 855 243 homes or 71,000 sq m employment
- 2 Site 1113 16,300 sq m employment
- 3 Site 872 22,300 sq m employment
- 4 Most of Site 1069 84,300 sq m employment
- 5 Site 1136 430 homes or 68,700 sq m employment
- 6 Site 1022 26 homes or 4,200 sq m employment
- 7 Site 1108 108 homes
- 8 Site 66 16 homes

Land has therefore been declared suitable for either 823 homes or for 266,800 sq m of employment floorspace. Other sites have been rejected because of availability or suitability concerns. This work has, however, been undertaken without the above available and suitable sites being included within the District's landscape evidence document, (Landscape Capacity Assessment for Sites on the Edge of Didcot, Henley, Thame and Wallingford in South Oxfordshire, September 2017). Other sites in Thame were included within this report, written by landscape consultants. The reason given for their absence from this report was that it had been based on the 2013 SHLAA, and many sites were not within that document. It does seem that conclusions on the capacity of the above sites, and the unsuitability of others, have been drawn up separately from this key document. This is indicative of evidence being created to align with a pre-determined strategy rather than a strategy being formed as a result of sound evidence and public consultation.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

All sites around Thame should be revisited and assessed using a methodology consistent with that used to assess all other sites within the District to ensure the wider Plan is sound. This would be through ensuring that the most suitable, i.e., sustainable sites can be selected for capacity assumptions and allocation within the Thame NDP.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 09:15

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H16 and paragraph 4.13

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not Justified.

The District Council have prepared this Local Plan against the background of the Government's increasing recognition of the importance of small sites. The guidance on undertaking housing and economic land availability assessments indicates a site threshold of 5 or more dwellings (or 0.25 ha, or 500 square metres or greater) should be used at the lower end (Paragraph: 010 Reference ID: 3-010-20140306 Revision Date 06/03/2014).

Further focus has been brought in considering small sites suitable for self-build and custom house builders. It is a requirement for SODC to maintain a register of these individuals who are seeking serviced plots suitable for housing development in the District's area. The authority will be further required to grant permission for a reciprocal number of serviced plots (Paragraph: 028 Reference ID: 57-028-201760728 Revision date: 28 07 2017).

Against this background the District Council have formed a settlement hierarchy that is split between the market towns and sub-divisions of villages. Larger villages have a specific target, each; the smaller villages have a percentage allocation, in line with their dwelling count recorded within the 2011 census. Small sites are not individually assessed. Yet the District Council must believe they exist, as Policy H16: Infill Development that proposes that such development will be supported where sites of 0.2ha (5 – 6 homes) exist.

Furthermore, Policy H16 declares that proposals for small-scale infill will be supported in "other villages" of up to 3 homes, or 0.1ha in area. No expectation of supply is expected from these small villages yet on past completion rates some 90 dwellings a year can be expected from the smaller villages and hamlets.

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if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We would wish to see specific and realistic assumptions made about the capacity of small sites to make a positive contribution to OAN.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 09:43

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. EMP6

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not Justified.

The provision of employment land of 35.9ha over the Plan period identified in Policy STRAT1, including that safeguarded within the Core Strategy, is inadequate as no attempt has been made to take account of loss of existing employment land and floorspace through the Employment Land Review, or its update. This is a serious omission as Thame on its own has lost some 690 jobs' worth of office floorspace, with a further 146 B1c – B8 jobs lost through associated development. (Homes and Communities Agency Employment Density Guide 2015 used for all land or floorspace – jobs density calculations).

It is strongly suggested that employment provision across the District has been underestimated:

- 1 The Town Council knows from Business Forum meetings, and contact with local estate agents that the stock of employment land within Thame is not meeting the needs of local employers, let alone businesses hoping to move to the Town. Our local employers, from SMEs to multi-nationals are struggling to grow.
- 2 We currently have no vacancies among decent properties, and nothing like the 10% vacant premises acknowledged as being necessary to ensure a healthy employment base. Large companies are having to take multiple small units, reducing stock availability for start-ups and SMEs.
- 3 The 1.6ha allocated to Thame is probably that identified as being "available" on land to the south-east of Howland Road Business Park. This is land behind BOC, the manufacturer and supplier of industrial and medical gases. Unfortunately, despite this being flagged up during the Thame Neighbourhood Plan and the Core Strategy consultation phases the District have neglected to recall that this is within zones 1,2 and 3 of the BOC Oxygen blast zone.

Thame would wish to evidence locally its own employment allocations through its neighbourhood plan, in excess of the level proposed by the District. This is especially important in order to achieve the 8% vacancy rates for employment space recommended by the ELR to permit efficient churn of employers.

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Thame Town Council recommend changing the text in Policy EMP6 to "These, and other employment allocations, will be delivered through a review of the Neighbourhood Development Plan".

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Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 09:57

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT3

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not justified, nor consistent with national policy.

The District Council is planning the dispersal of Oxford's unmet need across the District, without any recognised site being identified against any portion of it.

Oxford's unmet need is the only need that is being planned for within the Publication LP that comes from a single, discrete area. This enables the need to be traced to the individual household.

Perversely, in carrying out this policy, the District will be increasing the distance over which households from Oxford will have to travel in order to work in Oxford. This is against the core planning principles outlined in paragraph 17 of the NPPF.

Oxford City Council's Head of Planning has publicly stated that Oxford City's unmet need must be met within a 12 mile radius of the city centre. It is assumed this would be with the benefit of rapid public transport.

In Thame, although there is a regular bus service to Oxford at peak hours journey times regularly take around, and exceed, an hour for the 16-mile journey.

It is believed this portion of need, through not being directed to discrete allocations, is being used to future-proof the District's 5-year supply of housing land (beyond the first 5 years). This is not consistent with the District Council's duty to direct development to the most sustainable locations. The District are acting inconsistently in providing homes in the vicinity of Science Vale, in order to support growth there, but failing to in their duty to treat Oxford's unmet need equally well.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Discrete allocations for Oxford's unmet need must be made within reasonable sustainable travel distance of Oxford itself in order for the Plan to be based on the most appropriate strategy, and be consistent with national policy.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:07

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT3

Q4 Do you consider the Local Plan complies with the Duty to Cooperate? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The District Council are failing in their Duty to Cooperate.

The quantum of development for Oxford's unmet need is considerably less than that prescribed by the Oxfordshire Growth Board, a body that South Oxfordshire District Council is an active member of. The methodology took account of each authority's progress in the plan making process. The terms of reference of the Growth Board, its scope, method of working and evidence base has all been signed off by South Oxfordshire DC. The South Oxfordshire DC is failing to acknowledge that the distribution strategy for Oxford's unmet need was the result more of where each authority was in the plan-making process. For example, Cherwell District Council received a similar allocation as they were in the position to undertake a quick, early review of their Plan.

It is regrettable that they have acted unilaterally in their means of dealing with Oxford's unmet need and are not making specific allocations for the proportion they are acknowledging. The District are not showing constructive and active engagement in this matter.

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The District Council should prepare strategic allocations based on meeting Oxford's unmet need. Allocations should be made in the first five years, not devolved to a later plan. The final quantum can be allocated through the review of the Local Plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:18

Status Draft
Submission Type Web
Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H3 and paragraph 5d

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not Justified.

The market towns are treated as one amorphous allocation site. This can be evidenced by the fact that Henley has seen a reduction between its allocated dwellings of 186 dwellings between Preferred Options 2 and the Publication Plan, due to landscape concerns. The way the District has dealt with this is by passing 94 dwellings to each of the towns of Thame and Wallingford.

Paragraph 4.3 of the Infrastructure Delivery Plan shows that the necessary infrastructure within the market towns, including Thame, has only been estimated on the basis of the 15% growth. This does not take account of the gain in commitments and loss of allocated dwellings at Henley, or the gain in allocations at Thame and Wallingford of another 94 dwellings each.

If allocations have been made on the basis of them being sustainable development, it would not be possible to simply transfer significant proportions of allocations from one settlement to another without a further sustainability appraisal assessment, and a subsequent calculation of infrastructure requirements.

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Collective responsibility for allocations between similar settlement types should only occur following a full sustainability appraisal process and investigation into necessary infrastructure requirements. This will be required in order to make the Local Plan sound.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:24

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Objective 3.3

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not consistent with national policy.

The District are claiming that they cannot determine where people work and that some will choose to travel to employment locations beyond the District, such as London, Reading and Oxford.

This simple statement, although partially true, should not be assumed for Oxford's unmet need. This should be supplied by the District at identified sites close to Oxford itself. The majority of the people living in housing need in Oxford will be doing so because they need to work, or have community connections with Oxford. In abandoning the NPPF Paragraph 17 core principles of reducing the opportunity to travel sustainably, reducing pollution and placing significant development in locations that can be made sustainable, the Plan is unsound.

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The Plan needs to recognise that every attempt should be made to make development sustainable. For identified unmet need, there should be a strategy to ensure allocations are made in sustainable locations, or made to be sustainable, in line with Paragraph 17 of the Framework.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:35

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Objective 5.2

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not Justified.

Thame is a small market town that not only provides good, basic facilities for communities in its immediate area but has also traditionally provided local employment for an atypically high proportion of its residents. It is a town that has until very recently had a strong, community-focused feel despite being home to many global service and manufacturing companies.

Thame should therefore be able to support Objective 5.2 in its stated desire to respect the scale and character of the District's towns and villages. The Publication Plan is itself, however, ignoring this objective. Should the Plan succeed in its current form then Thame, within the period of a little over one decade, could well see its dwelling stock and associated population increase by over 31%. Around 600 of Thame's current allocation of 775 dwellings from the Core Strategy are looking to be delivered before 2020.

The major developers on the ground in Thame inform us that many of their new homes are being bought by those leaving London, at a level to suggest that net migration from and commuting flows to the capital are significantly above those outlined in the SHMA, sourced from ageing data sources (Table 3 Net Migration Flows with London, Annual Average 2006 – 2011 and Table 5, Commuting Destinations by Authority, 2001 census respectively). This risks turning a thriving, local market town into a clone, commuting town with all the associated risks for those who rely on our local services, including retail.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to meet one of their own, key objectives the District Council should work with Thame Town Council to deliver an allocation strategy that recognises the harm that significant allocations can cause community cohesion. In this, it must be made clear that Thame is not seeking to shirk its responsibilities, but notice must be taken of how swiftly our allocated sites have progressed through to completed homes on the ground.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID**Response Date** 30/11/17 10:39**Status** Draft**Submission Type** Web**Version** 0.1**Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map.** Objective 7.1**Q3 Do you consider the Local Plan is Sound?** No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not consistent with national policy.

The District are confusing the role of the Green Belt. The District Council are declaring it a natural environment asset, contrary to the "five purposes" as prescribed in paragraph 80 of the NPPF. The Publication Plan contains no active policy towards improving the character of the Green Belt in order to provide improved leisure or recreation opportunities, or enhance the landscape, etc. and indeed only recommends removal where it helps with the District's strategic development concerns. There is, therefore, no benefit in including the Green Belt within this Objective.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is recommended that reference to the Green Belt is removed from this Objective.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Thame Town Council have made many comments about the Publication Local Plan. We have significant concerns over cross-boundary issues, and other matters. We are seeking to help the District Council

produce a sound, legally compliant local plan that lends confidence to all those looking to develop or revise a neighbourhood plan.

Would you like to hear from us in the future?

- . I would like to be kept informed about the progress of the Local Plan
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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:47

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy TH1

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not justified.

The Town Council support the reference to the Thame Neighbourhood Plan and the positive approach taken in order to support and strengthen the Town's future. However, no support is expressed for development proposals that will strengthen community facilities within Thame. There are notable gaps in our facilities and we would hope to receive the clear support of the District in meeting them.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please insert text: "vii provide new, or enhanced community facilities that meet identified local, or visitor need".

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:52

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Entire Plan

Q2 Do you consider the Local Plan is Legally Compliant? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Omissions within the Infrastructure Delivery Plan (such as the failure to recognise the GP surgeries in Chinnor, Figures 22 and 23 of the IDP) lead the Town Council to suspect that the District may not have recognised that Buckinghamshire NHS Trust run services within Oxfordshire. Furthermore, Aylesbury Vale and Chiltern CCGs do not appear to have responded to the public consultations, unlike the Oxfordshire CCG.

In failing to recognise that the Buckinghamshire NHS Trust, a prescribed, specific consultee runs services within Oxfordshire the District may have failed to comply with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The District will need to provide proof that the Buckinghamshire NHS Trust has been actively notified and engaged with and full recognition of the services it provides made within amended evidence base documents. This will need to inform changes to the Publication Plan before adoption.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 10:58

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H12

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy H12 – Self Build and Custom Housing states states “Specific sites will be identified through NDPs.” No. The Self-build and Custom Housebuilding Act 2015 and separate Government guidance is clear on what relevant bodies are for the purpose of the Act and Regulations (Planning Practice Guidance, Paragraph: 024 Reference ID: 57-024-201760728 Revision date: 28 07 2017). There is no onus on a neighbourhood planning group to help deliver self-build or custom housing. They have been deliberately excluded from this list. This is because there is no expectation that NP groups can, or could, hold or control serviced plots or similar land they can dispose of for housing, which the scheme relies on.

The Policy further states “The Council will use its housing strategy and the evidence from the self-build register to identify appropriate locations for self-build and custom build projects.” The self-build register will be constantly moving; people can register interest in more than one area. Better monitoring will be required.

As an observation, Thame Town Council know of no land in or out of their control that is available for development for small sites within the Parish; all of the land that could potentially yield development is already in the control of major developers.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The second sentence of Policy H14 should be amended to “Specific sites will may be identified through NDPs neighbourhood planning groups working in cooperation with the District”.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 11:07

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy H13

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not effective.

The current Housing Strategy is inadequate in its detail. When asked in October 2017 of the timeline for the renewal of such a document, the Housing Policy Team at South Oxfordshire declared they had no plans to update the Housing Strategy.

It will be essential to ensure intelligence in this matter covers not just the demand by type (sheltered, extra care, retirement, adaption of existing properties) but the tenure. Older people will usually wish to remain in the communities they have become familiar with and it is vital that local people are not crowded out of the market by out-of-SHMA area migrant retirees. As Policy H15 is currently written, it would prevent Thame or any of the other market towns or villages from introducing a local occupier clause of any type, similar to the existing housing strategy. Thame feels this would be yet another example of where the Town Council should work with neighbouring parishes, including those within Buckinghamshire. This would be with the intention of understanding the needs of the older populations of these areas, and to explore how we prevent a future imbalance of housing between age groups and sections of our own community from being frozen out of suitable accommodation.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy H13 should be amended to "Specific sites and types of accommodation will be identified through Neighbourhood Development Plans".

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes - I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 11:11

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Policy INF2

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not effective.

This policy is meaningless without a clear definition of what target developers and service providers should work to.

The Town Council is unable to support this policy without a definition of what SODC consider superfast broadband is. Please note that the Government measure of superfast differs from that of Ofcom. Many local authorities are specifying that developers ensure the higher Ofcom standard is the minimum adopted, as outlined in this Parliamentary Briefing on the matter:

<http://researchbriefings.files.parliament.uk/documents/SN06643/SN06643.pdf>

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The District need to declare a standard for superfast broadband against which development proposals will be judged in order to make this policy effective over both the short term and the life of the Plan. It would be sensible to adopt a standard such as Ofcom's, that will change with improved technology and needs.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 11:14

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Paragraph 10.19

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not consistent with national policy.

The District have not defined Town Centres in way that is compatible with the NPPF Glossary's definition. The District appear to be restricting the Town Centre to only that which can encompass the primary shopping area.

The NPPF definition fits much better with existing Town Centre boundaries. This would include areas adjacent to the primary shopping area that is predominantly occupied by Town Centre uses. This also includes the boundaries of local and district centres.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text needs to define town centres in line with the NPPF definition, contained within the Glossary.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes - I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 11:19

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Entire Plan

Q2 Do you consider the Local Plan is Legally Compliant? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan may not be compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Town Council could find no reference within the Publication Plan, or any of its evidence studies, that regard has been had to the national waste management plan as required by section 10 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The District needs to declare within the Local Plan, if it can be declared, that regard has been had to the national waste management plan when preparing the Local Plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 11:30

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Entire Plan

Q2 Do you consider the Local Plan is Legally Compliant? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan may not be legally compliant.

The Town Council can find no reference within the Plan that regard has been had to the Local Transport Authorities' policies (the Local Transport Plan, etc.) and the requirement to prevent major accidents involving hazardous substances, etc., in the preparation of this Publication Plan. This would be contrary to Regulation 10 (1) (a) and (b) of the Town and Country Planning (Local Planning)(England) Regulations 2012.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The District Council need to declare within the Plan, if it can be declared, that regard has been made in the preparation of the Plan to Regulation 10 in its entirety.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 12:55

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. ENV12

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not consistent with national policy.

The aims of Policy Env12 are laudable. However, the District Council's strategy of dispersing Oxford City's unmet need across the whole District is not. This is unsustainable, in leading to lengthened journey times by private car or public transport; it will affect the quality of life of the dispersed individuals. This will in turn adversely effect the environment and public health.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to be sound specific allocations for Oxford's unmet need should be made in sustainable locations, or in locations that can be made sustainable in line with Paragraph 17 of the NPPF.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 13:57

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Paragraph 12.1

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not effective.

The District Council state in Paragraph 12.1 that they will monitor the Plan in order to ensure it is being delivered. They do not state that Plans should also be monitored to check against the adverse effects of policies. An example would be a type of dwelling that having been identified as needed through the Housing Strategy, is then over-provided, which should trigger a review of the Strategy, or the Local Plan.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to be effective across the life of the plan, monitoring should also be committed to that tests for adverse effects arising from the Local Plan policies.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 14:06

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Monitoring, Economy, Table

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not effective.

Given the concerns raised through the Employment Land Review, and the Employment Topic Paper, the amount of employment land lost to other non-employment-generating uses is a significant concern. Detail on use class order, quantum, and location should be recorded.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Setting the expectation of there being no loss of employment land (other than through permitted development, and brownfield allocation sites) emphasises the importance of the retention of these assets. Given the strength of the evidence base, plus the acknowledged shortfall of existing employment space, this would make the Plan more effective.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes - I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Thame Town Council have made many comments about the Publication Local Plan. We have significant concerns over cross-boundary issues, and other matters. We are seeking to help the District Council produce a sound, legally compliant local plan that lends confidence to all those looking to develop or revise a neighbourhood plan.

Would you like to hear from us in the future?

- . I would like to be kept informed about the progress of the Local Plan
- . I would like to be added to the database to receive general planning updates

Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 14:15

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. Monitoring, Natural and Built Environment, Table

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not effective.

The monitoring regime, through the use of the word "net", would allow the loss of Listed Buildings, Registered Parks and Gardens, Conservation Areas, Battlefield and sites of archaeological importance including Scheduled Monuments, as long as others can replace them! By their nature, these heritage assets are irreplaceable and cannot be traded.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Change text in order to make the Plan effective: "Net - Changes in the number of Listed Buildings, Registered Parks and Gardens, Conservation Areas, Battlefield and sites of archaeological importance including Scheduled Monuments" as the title; and "No net-loss" as the indicator.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Comment by Thame Town Council (Mr Graeme Markland)

Comment ID

Response Date 30/11/17 16:06

Status Draft

Submission Type Web

Version 0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. H9

Q3 Do you consider the Local Plan is Sound? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The Plan is not effective.

The most recent change within Policy H9 to a mix of 75% social rented, and 25% shared ownership is welcome. Concern still remains within Thame however that rates of social rent may still be beyond the reach of some concealed households.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Thame Town Council recommend a clause within H9 that allowed for alternative provision to be permitted in areas of high demand, such as through a Community Land Trust, or a requirement for local-occupiers, to be made through Neighbourhood Plans, to allow for very local circumstances.

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After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

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