

# South Oxfordshire Local Plan 2034

## Part A - contact details

Are you responding as an:

Business / Organisation

## Business / organisation contact details

Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

<b>Business / organisation name</b>	Thame Town Council
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## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** STRAT1

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified.

Paragraph 4.6 and Policy STRAT1 refer to and are involved with "strengthening the heart of South Oxfordshire". There is no definition of what the heart of South Oxfordshire is. Policy STRAT1 covers development over the whole of the District, without any differentiation other than scale of allocation. This is contrary to Paragraph 16 d) of the NPPF, which seeks clear, unambiguous policies.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

In order to ensure development is directed to areas consistent with the Strategy, and thus ensure the Plan is Justified and Effective, it is suggested that the settlements that comprise the heart of South Oxfordshire are named.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** STRAT4

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified and has not been positively prepared.

The most recent assessment of Thame's infrastructure needs in order to cater for the housing allocation within this Plan was reported in South Oxfordshire District Council's Infrastructure Delivery Plan Part B Report (Infrastructure Delivery Schedule), October 2017. The planned number of homes catered for within that schedule was 1,368 (Table 3.14, Thame Infrastructure Delivery Schedule) which included new allocations, Core Strategy and Neighbourhood Plan allocations and windfall commitments. The data was sourced mid-2017.

No account has been made of windfall development arising in surrounding villages on both sides of the Oxfordshire and Buckinghamshire border. The adjacent village of Haddenham alone had 657 commitments as of April 2018 and around 200 recent completions; and the surrounding villages have and are collectively making significant contributions. The Infrastructure Delivery Plan is only looking at the impact from South Oxfordshire's Growth, and not recognising the significant number of households who do and will rely on Thame as a service centre.

Infrastructure that the Town Council is particularly concerned about includes community facilities, open space and leisure facilities as these are core to our service centre role. It is not clear, however, to what extent Buckinghamshire and South Oxfordshire authorities are cooperating on certain issues such as education and health provision.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The District must revisit Thame's allocations in light of full cooperation with Ayelsbury Vale District Council and in recognition of the potential for harm to Thame's role as a service centre.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** STRAT5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?		X		
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not Justified and is not consistent with national policy.

The District's desire to raise density is understandable, given that some land has and continues to be developed inefficiently across South Oxfordshire, and they are seeking to release land from the Green Belt. However, the District have been highly selective in their interpretation of Paragraphs 122 and 123 of the NPPF.

Within their Housing Topic Paper (January 2019) they have selected text from paragraph 122 (a - e) that seems to support their case for planning for minimum densities of 50 per hectare in market towns. When read as a whole, and alongside paragraph 123, it is clear that the NPPF wishes the authors of policies to consider existing infrastructure, how it can be improved, the desirability of balancing density against the character of existing areas, etc.

The NPPF states that policy authors should seek to optimise the use of land where there is a shortage of land (the District, however, are claiming a potential land supply of 127,000 homes) and primarily, around town centres and other locations that are well served by public transport.

As currently written, STRAT5 and it's supporting text would be incompatible with Objective 5.2 of the Local Plan 2034 in proposing development that would not respect the scale and characters of towns and villages. The Policy and text are also at odds with the topic paper, which "sets" density at 45, 50, 70 dwellings per hectare, etc., and the Plan which prescribes "minimum" densities.

The Housing Topic paper gives some sketched examples of housing schemes achieving high densities. These tightly-packed homes would, for example, could serve to stoke the urban heat island effect, contrary to the duty to plan for climate change. There is no bin or bicycle storage and private amenity space seems to be almost absent. If this can be achieved, and well, why is the District not giving real world examples of modern, high density, mixed housing?

The District Council should also be aware of the potential harm in setting minimum densities. Developers seek to cram as many units into their developments as they can. This puts immediate pressure on local services. Families move into unsuitable, but cheaper accommodation and the cumulative pressure on services such as education and health quickly becomes significant.

The sudden change from 30 dwellings per hectare to at least 50 and 70 dwellings per hectare has come very late in the day. Although discussed in the Sustainability Appraisal, December 2018, the idea of such uplift has not been before the public, until now. This represents a significant shift in the Plan's direction that will have further ramifications beyond the scope of the SA.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The text should be changed to indicate target densities (not minimum) for town centres and areas well-connected in terms of public transport. For all other areas, densities above 30 dwellings per hectare should be an expectation, in line with LP2034 Policy DES8. The text should be clear and explain that all other policies of the Plan, plus guidance within the NPPF, any ensuing Planning Practice Guidance and Neighbourhood Development Plan policies must be observed for decision making purposes.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** H5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified.

Firstly, the outcome proposed within Policy H3 and paragraph 5.15 differs. In paragraph 5.15, it is stated that if an NDP does not progress within a specified time frame, the LPA will allocate sites using the SHLAA as a basis, in consultation with the local community. Within Policy H3 (and H4 and H5) it is claimed that planning applications that comply with the Development Plan will be supported.

The one-year deadline given for neighbourhood plan revision in paragraph 5.15 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, and another 18 months and two consultations at Regulation 19 for South Oxfordshire District Council to prepare a Plan for submission. Thame is a border town with duty to cooperate issues to consider with its neighbouring authority and parishes, evidence to gather, and complex allocations to propose yet we, and other neighbourhood planning groups would be given one year to proceed through to examination from the time the Local Plan is adopted.

For smaller parishes, or poorly resourced neighbourhood plan groups, this deadline will be impossible to meet. This gives a highly cynical means for the District Council to wrest control back from neighbourhood plan groups.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

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.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** H11

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** H12

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** H3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not Justified.

The housing requirement of 3,873 homes is expected to be "collectively delivered" target. This means that shortfall in one market town could be delivered in one or more of the others. This is wholly unacceptable. Subsequent evidence, infrastructure anomalies or a market downturn may well significantly reduce the potential to deliver sustainable development within specific towns.

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 5.16). It cannot be supposed that any significant growth, if allocated on the basis of sound evidence, can be pushed to other NP areas without a further, specific test for sustainability, or at the very least amendments to the Infrastructure Delivery Plan. To do so may well disrupt neighbourhood plans during or shortly after their preparation.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Remove the word "collectively" and reference to Wallingford, who do not now have a specific allocation, from Policy H3.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** EMP1

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

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 vacancy rates of less than 2%, 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 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, and earlier phases, the District have neglected to recall that this is within zones 1,2 and 3 of the BOC Oxygen blast zone and cannot be delivered in its entirety. 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.

In not taking account of loss of employment space the District are acting contrary to Objective 3.3, in not balancing economic and housing growth, and in not reducing the distance required to travel to work, Objective 8.2, minimisation of carbon emissions.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Thame Town Council recommend changing the text in Policy EMP6 to "The market towns and large villages will deliver the above allocations as a minimum, and others evidenced through Neighbourhood Development Plans or their reviews".

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** EMP3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not Justified.

Thame Town Council support Policy EMP3 but believe that clause 2) should be strengthened to include a viability test for any proposed mixed-use enabling scheme. This should ensure the maximum retention of employment land.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Suggested alternative text:

"2. In addition to the criteria above, where there is no reasonable prospect of land or premises being used for continued employment use, a mixed use enabling development which incorporates employment space should first be considered. A viability report may be required to ensure the maximum retention of employment land and floorspace in any subsequent scheme."

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** EMP10

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** EMP12

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** TRANS5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** INF2

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The aspiration to ensure fibre broadband in developments is welcome. Thame Town Council suggest adding text to make it clear that INF2 applies to conversions, change of use and sub-divisions of all residential and commercial property.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Add text to end of INF2 2.

"This policy applies to conversions, the change of use or sub-division of existing property, as well as new-build."

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** INF3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
<b>are legally compliant?</b>			X	
<b>are sound?</b>		X		
<b>comply with the Duty to Co-operate?</b>			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Air conditioning units may be required for certain telecommunications equipment.

Thame Town Council support Policy INF3 but recommend adding text to ensure neighbouring amenity is not harmed through noise associated with some telecommunication apparatus.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Suggested additional text to INF3:

2. v) that proposals for new or replacement apparatus should avoid harm to neighbouring amenity caused by noise from air conditioning or power generation equipment, etc.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

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**Document / Policy / Paragraph:** INF4

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** ENV5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** DES1

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES2

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES2

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES4

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

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**Document / Policy / Paragraph:** DES6

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES7

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES8

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** DES9

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified.

The District Council can at the very least apply the higher energy conservation standard set out by Secretary of State Eric Pickles in his Written Ministerial Statement of 25th March 2015. It could request more, where viable (see below). The WMS standard would make a significant contribution to reducing carbon emissions pending the abandoned review of Building Regulations and introduction of zero-carbon homes. The pertinent text from the WMS is:

"For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.

This is expected to happen alongside the introduction of zero carbon homes policy in late 2016. The government has stated that, from then, the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced, we would expect local planning authorities to take this statement of the government's intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent. This statement does not modify the National Planning Policy Framework policy allowing the connection of new housing development to low carbon infrastructure such as district heating networks."

Government response to the NPPF revision (paragraph 150b) confirms that LPAs can go further:

"A number of local authority respondents stated the view that the text in the revised Framework restricted their ability to require energy efficiency standards above Building Regulations. To clarify, the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations. The Government remains committed to delivering the clean growth mission to halve the energy usage of new buildings by 2030".

Thame Town Council are aware that the WMS higher level has been met at two of Thame's Core Strategy housing allocation sites, and that other planning authorities are seeking build efficiency higher than current building regulations.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

It is probably too late to commence a review of building standards, given that viability would have to be tested. Prior to review it is suggested to add text to Policy DES9 1. :

"With regards to energy efficiency, new development should meet requirements equivalent to Code Level 4, as permitted through Written Ministerial Statement of 25th March 2015".

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** TCT2

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** TCT4

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** TCT5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** STRAT1, H1, H3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

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 facilities; 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 or phasing of allocation, we would have to argue it at examination.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The District need to revisit the proposed housing allocation for Thame in light of joint working with Aylesbury Vale and a full understanding of the impact of local, cross-border housing and employment delivery on the market town of Thame.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** STRAT1, H3, H5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?			X	
comply with the Duty to Co-operate?		X		

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not positively prepared.

Only one mention is made within the whole Plan of Buckinghamshire, in paragraph 4.134 which describes Thame's role. Thame and Oxfordshire's 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.

The Vale of Aylesbury Local Plan is now running slightly ahead of 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 over 650 are committed and around 200, 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. For example, the Draft Leisure Strategy identifies housing coming forward within Thame for 1,612 homes across the Plan period; this disregards neighbouring Haddenham and the surrounding villages in Buckinghamshire. With some of the Draft Leisure Strategy's findings indicating capacity for leisure exceeded at 1,612 homes, it is clear that the Local Plan 2034, in failing to recognise Thame's role as a service centre, risks unsustainable growth.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The District need to revisit the proposed housing allocation for Thame in light of joint working with Aylesbury Vale and a full understanding of the impact of local, cross-border housing and employment delivery on the market town of Thame.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** STRAT1

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?		X		

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified and not positively prepared.  
 There is no evidence that the Town Centre of Thame requires further housing development in order to regenerate any part of its town centre. Current Core Stratetgy allocations both within Thame and adjacent Haddenham, and windfall development from both sides of the border are already ensuring sufficient housing development to keep the Town viable and vibrant.  
 There are no vacant retail units within Thame town centre, and there have not been for almost 3 years. Our leisure offer is and may always be limited by our catchment area, particularly in relation to the night time economy. Our frequent markets and events and the employment of a Market Town Coordinator help keep Thame's offer fresh.  
 Furthermore, environmental improvements referred to in STRAT1 for Thame are unreferenced. What are these, and how will they be delivered within the Plan period?

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The District need to revisit the proposed housing allocation for Thame in light of joint working with Aylesbury Vale and a full understanding of the impact of local, cross-border housing delivery on the market town of Thame.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** STRAT1, H1, H3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified.

The SHELAA on which allocations have been based is leading to double counting of completed housing sites. Thame Town Council has checked two SHELAA sources:

The list of sites given on the Council's webpage: <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=SDSList&PARISH=THA&Submit=Search> is out of date.

Of the first five sites on the list, 4 have been developed. Others are similarly so.

Regrettably, the second source, the latest SHELAA (January 2019) is similarly double-counting housing land. Appendix Two, which contains the proformas, similarly lists several sites that have already been or are being developed, such as 67 Park Street, Jane Morbey Road, etc. The entirety of Thame Town Centre has been suggested, giving a site area of 16.3 hectares, of which 15.9 hectares are in an Area of Archaeological Constraints, not to mention the Thame Conservation Area. The site is still, somehow, considered suitable for 489 dwellings, presumably on the remaining 0.4 hectares that are not in the constrained areas.

Brand new and modern employment sites are identified, too. Howland Road Business Park, one of Thame's most modern facilities, fully occupied and fit for purpose somehow finds itself on the proforma. Thame Business Centre, 8 hectares of new, modern units is similarly identified.

Dormer Road in Thame, an industrial estate from the 1960s, is apparently covered by 99.4% Grade 1 to 3 agricultural land but is judged to be capable of hosting 183 dwellings.

It is clear that many of these errors have arisen as the result of "planning by Google Maps" whereby old aerial imagery has been used as the basis for the original SHELAA assessment, and never revisited. The SHELAA is not fit for any purpose and, it is to be suspected, neither is the District's identification of land for 127,000 dwellings.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The District Council must revisit the whole SHELAA evidence base in the Thame area (and possibly further afield), with visits to the field, and the direct involvement of people with local knowledge. In the interim, the District must revisit their allocations for the Thame area.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** Entire Plan

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?		X		
are sound?			X	
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not legally compliant.  
 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 South Oxfordshire District Council Infrastructure Delivery Plan Part A Report) lead Thame 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.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely 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.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** Chapter 12

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan is not justified.

It is not stated that Plans should also be monitored to check against the adverse effects of policies; it seems that the focus is on the delivery against targets only. 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 set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Insert text:

Paragraph 12.6. As well as tracking progress against the Plan, monitoring will also ensure that policies do not lead to adverse effects or unforeseen outcomes. Action proportionate to the impact and severity of these outcomes will be taken.

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** CF1

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** CF2

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** CF3

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** CF4

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

Yes

## Part B - your comments

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** CF5

Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?	X			
comply with the Duty to Co-operate?	X			

Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Would you like to comment on another policy or paragraph?

No

## Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire