DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	G4	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	◉ Yes	○ No
(b) is sound?	○ Yes	◉ No
(c) complies with the duty to co-operate?	○ Yes	◉ No

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	✔	(c) effective?	✔
(b) justified?	✔	(d) consistent with national policy?	

Q4. Please tell us below why you consider the document to be unsound, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.

This policy proposes a minimum 10% Biodiversity Net Gain.
Given Oxfordshire's depleted natural environment, the level of development coming onstream and the lack of net gain* that would be delivered by a 10% commitment, this is a high risk approach.
The Oxfordshire Local Nature Partnership (OLNP), of which Oxford City Council is a member, has developed a full evidence base and rationale for Local Planning Authorities to justify more than the mandatory 10% BNG.
Failure to respond to this evidence means that this policy would be in breach of NPPF Para 179b which states that Plans 'should identify and pursue opportunities for securing measurable net gains for biodiversity.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) It would be helpful if you could suggest revised wording for the policy or text in question.

The policy should be re-worded to reflect the evidence base available via the Oxfordshire Local Nature Partnership and endorse development where it delivers a minimum 20% biodiversity net gain.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form