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	S4	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.

Failure of a developer to purchase land at an appropriate price for development may result in a declaration of non-viability. The 'cascade' approach implies that in such a situation all considerations will be made to force the building of affordable housing at the expense of biodiversity, net zero, sustainability and all other considerations thus rendering the whole Plan ineffective.

We consider this policy to be inconsitent with NPPF policy 8 (a) which states that council should ensure that: "sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity." The problem is that Oxford does not have enough land to do this. The submitted local plan recognises the catch 22 situation created

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.

Assessments of viability must not be allowed to exclude requirements for biodiversity, net zero, or sustainability if there is evidence of insufficient attention to the implications of affordable housing policy requirements, and local market indicators, when purchasing the land for development.

Policy S4 should not prioritise the provision of "a sufficient number and range of homes can be provided to meet the needs of present and future generations" over "fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being." These two factors must be judged and assessed on an equal basis.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form