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	4.9	Policies Map	
Policy Number	G1	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.

See our representations on the Duty to Co-operate set out in response to para 2.3 of the Local Plan, which also applies to para 4.9 and Policy G1.

Paragraph 4.9 of the Local Plan references the need for any applicants for land that is open space for outdoor sport including pitches, to refer to the Council's latest Playing Pitch Study.

The NPPF (September 2023) states at paragraph 98 that "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." Such

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 Plan doesn't have the necessary evidence base covering this plan period to inform coherent decision making. This has significant impacts on the robustness of the housing capacity of the City and generates more unmet need. We have raised this issue, but with no remediation the Plan therefore does not meet the duty to cooperate and cannot be rectified.

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This is the end of the comment form