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	HD8	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 Policy HD8.

Policy HD8 promotes the efficient use of land appropriate for its context and surroundings. This is stated at paragraph 6.33 of the plan to be because using scarce resources efficiently is vital to ensuring Oxford's sustainable growth and development; and there is capacity to increase density in some parts of the city.

In more detail, the draft policy highlights that sites in the city centre, district centres and at mobility hubs will be capable of accommodating increased scales and densities of development, and that this is also encouraged in all other appropriate locations when impacts are acceptable.

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.

Fails the duty to cooperate and cannot be rectified.

Although the City Council cannot rectify the engagement matters, the policy could have addressed this failure in the following ways:

1. It could have stated that there is capacity to increase density in other more suburban areas and along main arterial roads, not in the supporting text;
2. Increased the density assumptions for Gateway sites;
3. A lower density range being used in all conservation areas shouldn't be a blanket option.
4. It could also have explained how the density ranges are evidenced, especially in the context of parking changes.

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This is the end of the comment form