

JPPC ref: DB/6973

Planning Policy  
Oxford City Council  
SUBMITTED VIA E-MAIL

5<sup>th</sup> January 2024

Dear Sir or Madam

### **Oxford Local Plan 2040- Pre-Submission Consultation**

We write in response to your current consultation Oxford Local Plan 2040 Proposed Submission Draft, on behalf of the Oxford Centre for Islamic Studies (the Centre).

This response offers an overview of the Centre, its academic role with regard to the city and University of Oxford ('the University'), and development needs to provide essential context to our consultation comments. This response then proceeds to offer focussed comments upon the proposed policies in line with the consultation regulations.

### **Background**

The Centre was established in 1985 and in 1993 the former Prince of Wales became its patron. It is an institution for the advanced study of Islam and the Muslim world. Some Centre fellows discharge academic responsibilities in different faculties of the University. They and others also hold College fellowships with the attendant responsibilities for tutoring, supervising, examining, etc. The Centre's research, teaching and publication activities draw upon and contribute to the specialist expertise and excellence for which Oxford is renowned. The Centre's library linked to the University's digital catalogues, and open to its students, who are also principal beneficiaries of the Centre's seminar and lecture programmes. The Centre provides scholarships to students accepted through the University's admission procedures to read for degrees in a wide range of fields.

The Centre's approach to the University is oriented by, indeed specified in, the charitable purposes for which it was founded which are enshrined in the Royal Charter. It is dedicated to enabling productive encounters between the many disciplinary and cultural perspectives that specialists bring to their study of Muslim societies. Such encounters inform more constructive relationships across cultural boundaries.

Cont...

Over its thirty-eight years the Centre has built up an extensive network of contacts with individuals and institutions worldwide. It has welcomed visiting fellows and scholars from over 50 countries and every continent to most of whom it has provided dedicated accommodation. It has drawn many world figures to lecture in Oxford, from Nelson Mandela, Jimmy Carter and Kofi Annan to current Heads of State and Government. While enhancing both the city's reputation as a hub of international public life and international academic outreach, the Centre's activities (notably its 'young Muslim leaders' programme) contribute to better understanding, belonging and cohesion within the UK. The public service of the Centre in this regard was recognised in the award by the late Queen Elizabeth II of a Royal Charter in 2012.

The Centre now occupies a landmark complex of buildings set on the corner of Marston Road and Kings Mill Lane. The buildings have been widely praised for celebrating and complementing the familiar style of Oxbridge college architecture and received a building of the year award in 2017 from the Oxford Preservation Trust. Throughout the planning approval and construction phases, the Centre sought, and gratefully received, the support and good advice of local MPs, City Councillors and successive Lord/Lady Mayors. It welcomed many local visitors over the years of construction and participates actively in the Oxford Open Doors Programme. The site plays an important role in its local community; indeed the Council have sited information boards at the Centre to publicise consultation on the emerging Local Plan.

In the years ahead there is great scope to use its new facilities, including a state-of-the-art exhibition gallery, to increase its outreach, especially to local schools, to enrich the diversity of cultural, educational and intellectual life in the city. The Centre will continue to provide job opportunities at all levels as it expands its activities and generate additional economic activity through the procurement of goods and services from local suppliers.

The Centre is committed to financial stability, and plans for a viable, appropriate development to meet demands for student and staff accommodation, for improved technologies and equipment, for adaptiveness to the predicted further increase in the involvement of entrepreneurial interest in research activities and how these are managed for specialist and non-specialist public access. The opportunities that arise for the Centre in respect of its place and role in the life of the city as a whole, and in respect of the evolving guidelines for the city's development policy, are similar to the issues that arise for the universities and their constituent bodies. It follows that the considerations put forward in this paper would most likely be shared by the colleges and universities. However, it is important to stress that representations made to the Council herein are made by and on behalf of the Centre and no other party.

The Centre benefits from its interactions with the University while also contributing to Oxford's status as the world leader in many academic fields. While the city is broadly classed as prosperous, the Council is aware that some sectors of the community are excluded from this prosperity. The Council has also identified the pressing need for housing, especially affordable housing, in the city and districts; and traffic congestion, due in part to the layout of the medieval city and its rivers, but mainly to the fact that almost half of people working in the City travel into Oxford.

The Centre has a requirement to provide appropriate housing for its scholars and its permanent staff working in the administration or other essential, on-site support services. The City's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best,

without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.

### **The Centre's Sites- Old Government Buildings and Harcourt House**

The Centre owns two sites on the eastern side of Marston Road which it intends to develop. The northern site is known as the Government Buildings Site, with the southern site occupied by and known as Harcourt House. The Government Buildings Site is previously developed land largely laid to hardstanding having previously been used as a car park. The Harcourt House site features several buildings, including Harcourt House itself a substantial office which retains a lawful use in Use Class E, confirmed by the Council through lawful development certificate 21/00284/CEU.

The sites are allocated for development as a single entity in the current Local Plan as site allocation SP16 which states:

*“Planning permission will be granted for residential development, student accommodation and academic institutional uses at the Government Buildings and Harcourt House site. The minimum number of homes to be delivered is 70. Other complementary uses will be considered on their merits”.*

The Centre's sites on Marston Road are (1) allocated for development, (2) adjacent, and (3) owned by a single entity (the Centre), whose main buildings are just across the road. These characteristics mean that development on the two sites can be complementary, make the most of shared space and access, favour the kind of mixed-use development urged by the City, and build to a standard that enhances the neighbourhood of the Centre's main buildings, and provides the appropriate facilities for residents to live close to their places of study and work, and to get a richer experience of Oxford academic life.

The sites are in an important location to the edge of the Headington Hill and St Clements and Iffley Road Conservation Areas. There is significant scope for development to make a positive contribution to the designated heritage assets in these areas. Being situated just opposite, the Centre has a strong incentive to develop the sites to a standard that adds to the quality of its main buildings and their neighbourhood. The Centre needs to provide accommodation for its scholars and for academic and support staff (key workers); it also needs to use the sites for academic purposes and complementary commercial activity. Additionally, as noted earlier, there is a particularly pressing need in the city for good quality accommodation for the graduate student population. The Centre intends to develop their sites as part of its campus in a manner sensitive to its surroundings which is also economically viable.

### **Comments on proposed policy**

#### **Policy MRORAOF: Marston Road and Old Road Area of Focus**

We welcome the inclusion of this policy which notes the qualities of the area and seeks positive change. We do however feel, having regard to the intention to stimulate sustainable development, the policy would be improved by modifying the description of the area around Cuckoo Lane (point (h)).

The Centre intends to provide a development upon their sites (allocation SPE1) which respects and enhances the area, including the green character of the adjoining Headington Hill Park and Cuckoo Lane. Although we feel the policy's description of the area as 'verdant' is accurate, we do not feel the reference to 'rural' reflects its character. We are concerned it will hinder the efficient use of land desired by the Council.

The area has a 'green' character formed by mature trees and parkland in the vicinity however this is very much part of the patchwork of the city, rather than outlying countryside. This is particularly so in the context of the redevelopment of Oxford Brookes' student accommodation adjacent to Cuckoo Lane (ref. 21/01185/FUL) which features blocks up to six storeys in height.

We believe the reference to a rural character should be omitted to ensure development policies in this area are effective and the plan is sound. This change will not undermine the purpose of the policy or desire to maintain the green character but will remove a potential impediment to sustainable development of the site.

### **Policy SPE1: Government Buildings and Harcourt House**

The Centre maintains its desire to develop its sites on Marston Road (Government Buildings and Harcourt House) to improve and expand the facilities of its existing campus. It welcomes the inclusion of its site as an allocation for development in the Area of Focus.

The allocation should retain the schedule of uses set out in the current Local Plan policy SP16, namely residential development, student accommodation, academic institutional uses, and other complementary uses which will be considered on their merits. This schedule was established after thorough consideration and examination. Draft policy SPE1 includes the same schedule of uses as the current Local Plan allocation policy SP16, they are though not as clearly expressed. It is necessary to set out the permitted uses clearly, as in the current Local Plan, for the policy to be sound.

The Centre intends to include commercial research and development space within a site redevelopment, in partnership with colleagues in the academic environment, to complement academic research. These activities would be 'spin out' application of academic research in economic, human, scientific, and technological fields as is the norm in the modern academic arena owing to obvious benefits from the co-location of cutting-edge research and its commercial application. We believe such spin-out use could be supported in a planning application under policy SPE1 as a 'complementary use', however effectiveness of the policy would be improved if it expressed explicit support for spin-out commercial space. This will allow proposals to proceed with greater certainty, and so ensure soundness.

The Centre appreciates the importance of strengthening links with the green space around the site through development and intends to do so. Having regard to the site's position to the edge of the park and spanning Cuckoo Lane the most meaningful contribution to green space is likely to be through improved connections to these green areas, rather than arbitrary provision of additional public open space within the site. This was acknowledged by the Inspector during examination of the current Local Plan who required removal of a mandatory requirement of on-site green space from the draft site allocation policy.

Other development management policies require provision of green space and so adequately address the issue while retaining flexibility to ensure the best solution for the area is secured. Hence reference to public open space should be omitted from site allocation policy SPE1. Removal of this reference would not lessen the soundness of the policy but would improve its effectiveness.

### *Design requirements*

The draft policy includes detailed commentary on expectations of a development. This results in a lengthy policy. Commentary provided in SPE1 in the main replicates matters covered in draft development management policies in the Plan.

The extensive additional commentary in SPE1 is at the expense of clarity and undermines its soundness. It is more akin to guidance and would be better expressed as such, supplementing a concise allocation policy. The separation of guidance and policy would also be beneficial in differentiating requirements that are likely to be strictly interpreted, and points which are made to guide development proposals.

There are also elements of draft policy SPE1 which are, in our view, incorrect and others likely to prevent best development on the site. We supply a copy of the policy with suggested alterations and comments, as **Attachment 1** and for ease of review offer comments below.

### *Open space, nature and flood risk*

Having regard to other local and national policy requirements ecological assessment appears certain to be needed. It is unhelpful for the policy to indicate it 'may' be needed. In any case, there is no need for the policy to comment on the need (or otherwise) for specific assessments. The passage can be adjusted to read:

*"Development proposals are expected to demonstrate harm to biodiversity will be avoided, mitigated or compensated"*.

The Centre fully supports the Council's green aspirations. However, the suggestion that buildings should incorporate green roofs is at odds with (draft) policy HD7 which requires all developments to be informed by a constraints and opportunities review. It simply cannot be said at this stage that green roofs are the best design choice for the development and it is inappropriate for policy SPE1 to express a preference. The aspiration of the policy (i.e. building incorporating 'green' features) can be adequately expressed without pre-judging design, we suggest:

*Opportunities to incorporate green features in the design of any new building should be maximised, such as green roofs, which are a feature of neighbouring buildings in Clive Booth Student Village.*

### *Urban design and heritage*

Policy HD7 requires constraints review to guide development (as noted in draft policy SPE1), however this is undermined by the allocation policy speculatively suggesting the best arrangement of development on site. The commentary *"The most efficient arrangement for the site is likely to be blocks parallel to the road to create a consistent building line within the setting of the trees"* should be omitted.

We also consider it necessary to clarify commentary on expectations regarding views across the site. The commentary is framed around building heights and, based on text preceding policy SPE1 (para. 8.183), is understood to be concerned with important views across the site from elevated viewpoints as noted in view cone and conservation area documents.

The policy should be modified to make clear the views which are of particular concern. As drafted, the policy could be interpreted as resisting any development that obscures any existing view across the site from any direction. This is likely to hamper positive



development. Construction of buildings on the site will inevitably interrupt views from Marston Road at street level, though this will not be harmful by default.

We believe the above suggested changes are important to future application of the policy and progression of development proposals on the allocated site, thus they are needed to ensure the Local Plan is sound.

### **Policies S1: Presumption in favour of sustainable development, and S4: Plan Viability**

We welcome the inclusion of draft policy S4 which acknowledges the need for pragmatism in decision making where development of a site is not financially viable.

The draft Local Plan seeks to introduce a raft of new requirements for development including regarding building performance and ecology. While these are clearly important matters and admirable aims for the Local Plan they must be considered within the economic realities of development.

This is particularly pertinent for sites such as the Centre's campus sites on Marston Road which are longstanding allocations. The introduction of additional requirements on sites which have longstanding viability challenges is likely to hinder their development. Clearly it is a poor outcome for sustainable development in the city for well-located sites to remain dormant. Inclusion of the policy is critical to the Local Plan being found sound.

Similarly a positive approach to planning applications, in line with the presumption in favour of sustainable development, will be essential to delivery of development particularly on allocated sites. We suggest a minor change to draft policy S1 would aid this and with it the soundness of the Plan. The first sentence of policy S1 should be modified to read (suggested new text underlined):

*"Planning permission will be granted where development proposals accord with the policies of the Plan taken as a whole"*

This wording better reflects duty on decision makers set out under Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) to have regard to the Development Plan as a whole and should ensure beneficial developments proceed in a timely manner.

### **Policy H3- Affordable housing from student accommodation**

We welcome modification of this policy following your Preferred Options consultation to retain exemption from the requirement for developments within existing and proposed university or college campus sites which is in the current Local Plan (policy H2). However, the draft policy states exempted campus sites are defined in the glossary, but the term is not in the glossary. The definition needs to be included for draft policy H3 to function.

For the avoidance of doubt we are clear the exemption must include the Centre's sites on Marston Road (allocated under SPE1) retaining the exemption afforded under current Local Plan policy H2. This exemption was introduced at examination as without it campus developments, including the Centre's, which are critical to delivery of the Local Plan would not be viable. Delivery of student accommodation is integral to the development of academic and institutional facilities (under draft policy H10) which is fundamental to the economic vision of the Plan.

Financial considerations for campus developments are very different to those for standalone student accommodation schemes undertaken by commercial developers. Student accommodation provided as part of campus developments by institutions, including the Centre, is often only marginally viable given the higher build costs in providing the necessary quality of building and the responsibility to provide high quality accommodation to its students at a reasonable rent. The costs and likely returns on development are quite different from commercial student accommodation schemes which have flexibility in location, design, and end rents.

The exemption afforded to campus developments from contributions to affordable housing is critical to the soundness of the Local Plan. The glossary definition of campus sites referred to in policy H3 must be added, and this must include the Centre's sites, in the same manner as the current Local Plan to make the draft Local Plan sound.

### **Policy H5- Employer Linked Affordable Housing**

Policy which allows for homes which are affordable to be provided by key employers is positive and can help stimulate essential development, particularly on sites with a longstanding allocation which has not progressed. Employers in the city have long expressed the difficulty presented by the housing crisis, they therefore have an obvious interest in ensuring any homes provided are genuinely affordable to their workers. Increased ability for employers to provide homes for workers close to their place of work would also support the emerging Local Plan's increased emphasis on reducing need for people to travel.

The Council are aware of the Centre's longstanding aspiration to develop its campus sites on the Marston Road. Within the campus development it is hoped to provide homes for the Centre's staff. We believe the Centre's site should be one on which policy allows for employer linked affordable housing.

Inclusion of the Centre's sites under policy H5 would be highly desirable to facilitate development of the previously developed land to realise the economic and social vision of the Plan and so improve its effectiveness.

The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration, or other essential, on-site support services. The city's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best, without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.

We consider the site, which is to be developed as part of the Centre's campus on Marston Road should be included as a benefitting site under policy H5.


### **Conclusion**

We are grateful for the opportunity to comment on the Local Plan and trust these comments will be considered. We would be pleased to elaborate upon any of the matters raised and wish to be notified of, and participate in, any further consultation or examination into the submitted documents.

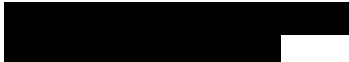
We wish to be notified when the Council submit the Local Plan 2040 to the Government for examination, when the Inspector's Report is published, and when the document is

adopted by the Council. We also confirm we wish to speak at any examination into the Local Plan.

Yours faithfully,

A large black rectangular redaction box covering the signature of David Burson.

David Burson LLB MSc. MRTPI  
Associate

A black rectangular redaction box covering contact information, likely a phone number or email address.

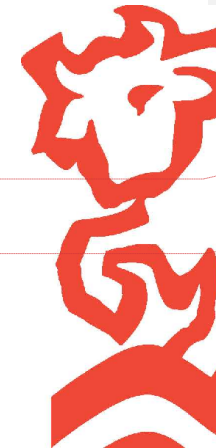
ATTACHED: Extract of draft policy SPE1 with comments



# ATTACHMENT 1: Extract of draft policy SPE1 with comments



OXFORD  
CITY  
COUNCIL



## POLICY SPE1: GOVERNMENT BUILDINGS AND HARCOURT HOUSE

Planning permission will be granted for residential development and public open space including student accommodation, as well as other academic institutional uses (subject to Policy H10). The minimum of dwellings to be delivered is 70 (or, if delivered as student rooms, the number of rooms that equate to this when the relevant ratio is applied). Other complementary uses will be considered on their merits.

### Open space, nature and flood risk

Policies G1 and G3 require protection of existing green infrastructure features and enhancement of greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. There are a number of high-quality green features on the site, including mature trees, trees protected by TPOs, and hedges which should be retained wherever possible in order to help define a natural setting for proposals in line with the landscape and townscape character of the area, and help ensure no decrease in the Urban Greening Factor baseline score. External areas should work with existing green infrastructure such as the existing trees on the site and establish green linkages through the site, incorporating existing features as well as new planting and small green spaces. In particular, the existing green infrastructure and proximity of the site to Headington Hill Park creates an opportunity for wildlife corridors around the edge of, and through the site, which should be enhanced through the site as part of the green infrastructure provision.

A biodiversity survey may be required to assess the biodiversity value of the site and where appropriate it should be demonstrated how harm will be avoided, mitigated or compensated.

Opportunities to incorporate green features in the design of any new buildings should be maximised, ~~such as green roofs, which are a feature of neighbouring buildings in Clive Booth Student Village.~~ Development proposals should seek to reduce the impermeable surfaces across the site and introduce more natural landscaping and SuDS features.

Planning permission will only be granted if it can be proven that there would be no adverse impact on the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water flows. Development proposals must incorporate sustainable drainage with an acceptable management plan.

### Urban design and heritage

Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. ~~The most efficient arrangement for the site is likely to be blocks parallel to the road to create a consistent building line within the setting of the trees.~~ Building heights should be designed in a way that avoids interrupting or disrupting existing views across the site, particularly where their location is sited within the protected view cones.

Adjustments and considerations at design stage may be helpful in reducing the ongoing impact of poor air quality. Potential options may include considering layout options that place habitable spaces and openings away from pollution sources such as busy roads, landscape buffers, and designing in walking and cycling options as integral part of schemes.

Secure by Design Principles should be incorporated into design of external areas including clear, well-lit pedestrian,

**Commented [DB3]:** Delete prescriptive commentary regarding green roofs (shown strikethrough)

**Commented [DB1]:** Suggest revised wording to clarify permitted uses on the site and omit reference to open space.

*“Planning permission will be granted for residential development, including student accommodation, as well as academic institutional uses and complementary commercial use”.*

**Commented [DB4]:** Delete prescriptive/presumptive text regarding site layout to retain free hand to design following proper constraint review

**Commented [DB5]:** Revise text to clarify views which are of concern in development. Make clear not all/any view across site

**Commented [DB2]:** Revise wording regarding ecological surveys:

*“Development proposals are expected to demonstrate harm to biodiversity will be avoided, mitigated or compensated”.*

cycle and vehicular access from the Marston Road, well surveyed from the proposed buildings and sensitive to the Headington Hill and St Clements Conservation Areas.

Development proposals must have consideration of their impacts on the setting of the Headington Hill Conservation Area, particularly for development of the southern parcel; as well as the setting of the nearby listed buildings Headington Hall and St. Clement's Church. Proposals must demonstrate compliance with policies HD1 and HD2. Design of development blocks and choice of materials should be sensitive to the special historic qualities and character of the area and ideally seek to enhance this.

Development proposals must take into consideration the potential presence of archaeological remains related to the Civil War Parliamentarian Siege line. Due to this potential, development should demonstrate compliance with Policy HD5.

#### **Movement and access**

Proposals should seek to improve upon accessibility to the site for pedestrians and cyclists. The southern parcel requires either a new pedestrian access behind the tree line or new crossings to be accessible from Marston Road. There is the potential for pedestrian linkage between the sites, where Cuckoo Lane and the park meet the road. Linkages with

the adjacent park should be explored to open access for occupants to this green space, however, care should be taken in how entrances are placed to reduce impacts on the green character of the eastern boundary or the setting of the park.

#### **Natural resources**

The green boundaries to the west of the site should be retained and enhanced to mitigate impacts from air pollution and general traffic impacts from Marston Road.

The site is in an air quality hot spot area. Development proposals must demonstrate compliance with Policy R4 by ensuring that all necessary mitigation measures against poor air quality have been incorporated during the construction and operational phases and ensuring that any potential negative air quality impacts are adequately mitigated on an ongoing basis, within and surrounding the site.

Development proposals will be required to include an appropriate site contamination investigation and applications will be required to demonstrate how any contamination issues will be resolved in compliance with Policy R5.

Development proposals must include an acoustic design statement to be submitted in compliance with Policy R7 as this site is part of an area which is subject to significant environmental noise from the traffic on the surrounding roads.

# Oxford Local Plan 2040

## Submission Draft COMMENT FORM

# Part A

You only need to  
fill Part A in once

Your name:

Organisation (if applicable):

Address:




Email:

Date:

### Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2040 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2040 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

- If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.
- If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

**Do you wish to speak at the examination hearings?**

(Please note that the Inspector will decide who to invite to speak)

Yes  No

**Do you wish to be notified when:**

the Council submit the Oxford Local Plan 2040 to the Government?

the Inspector's Report is published?

the Oxford Local Plan 2040 is adopted by the Council?

## GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at [www.oxford.gov.uk/localplan2040](http://www.oxford.gov.uk/localplan2040)

When completing the form,

You only need to complete Part A once

Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2040

Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it

Be as precise as possible

## HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

[planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

### Planning Policy Team

Oxford City Council

Town Hall

St Aldate's

Oxford

OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team

**T: 01865 252847**

[planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

[www.oxford.gov.uk/localplan2040](http://www.oxford.gov.uk/localplan2040)

Please ensure your comments reach us by **4.00pm on Friday 5<sup>th</sup> January 2024.**

Thank you for participating.

# DETAILS OF YOUR COMMENT

## Part B

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.

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

**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

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 not: (tick as appropriate)

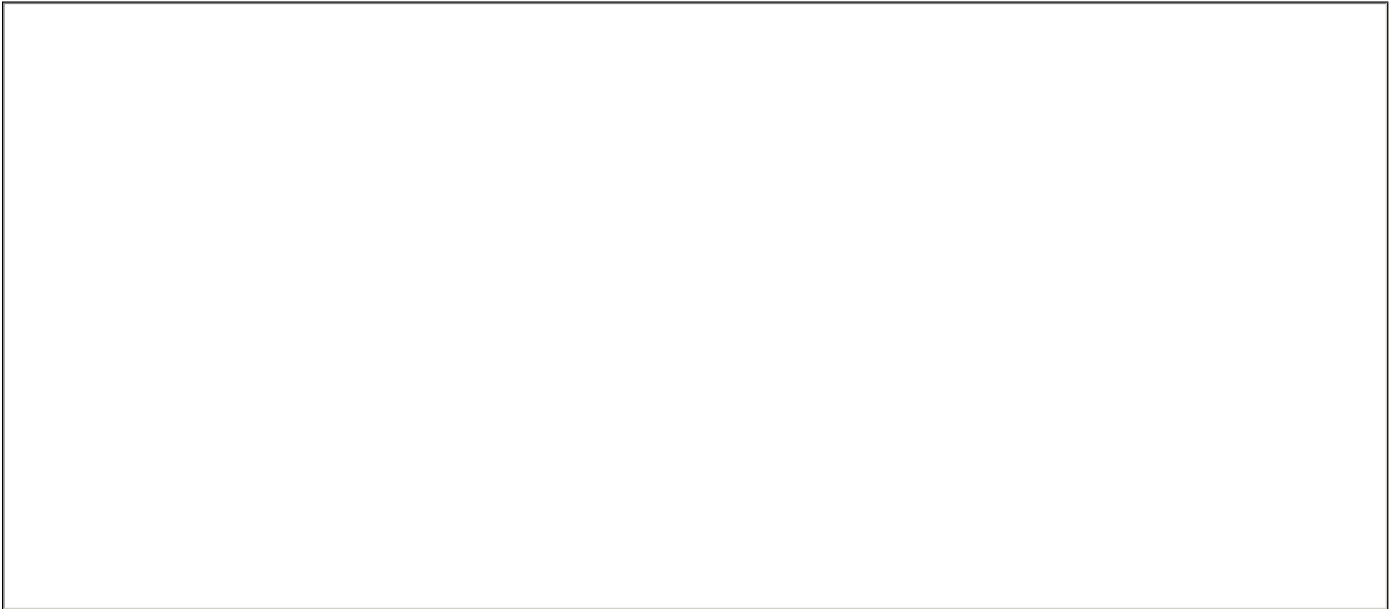
(a) positively prepared?  (c) effective?

(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.

*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.



*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**



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(c) complies with the duty to co-operate?  Yes  No

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(b) justified?  (d) consistent with national policy?

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Policy Number

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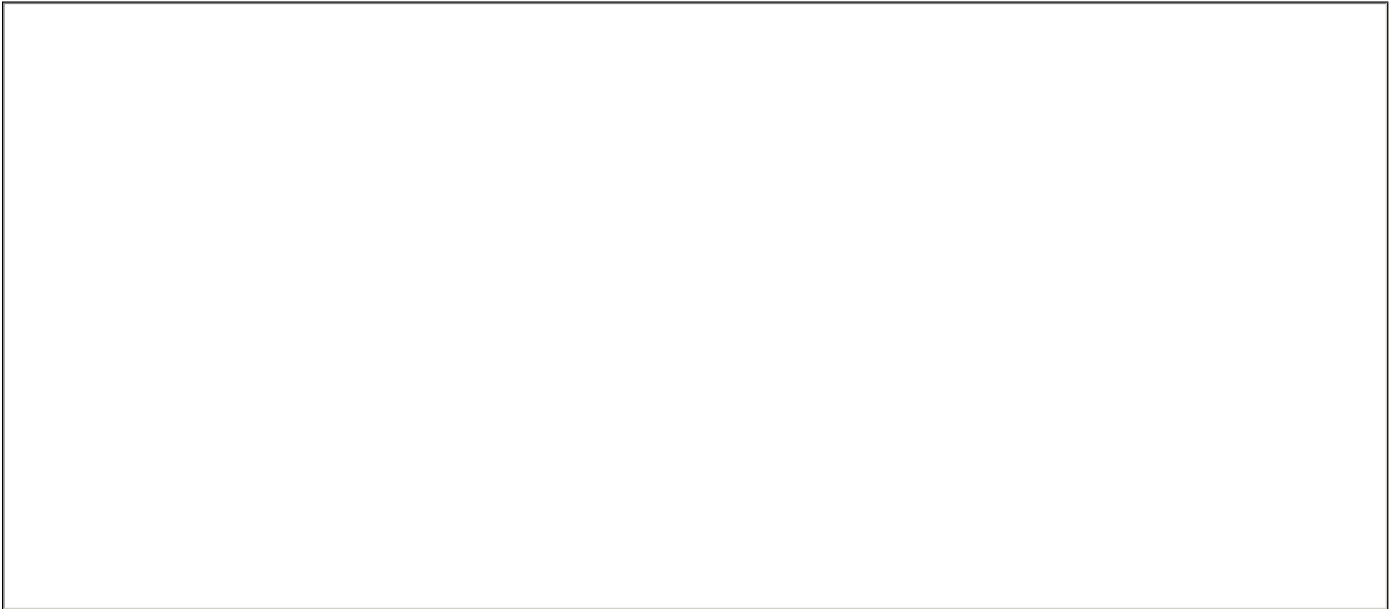
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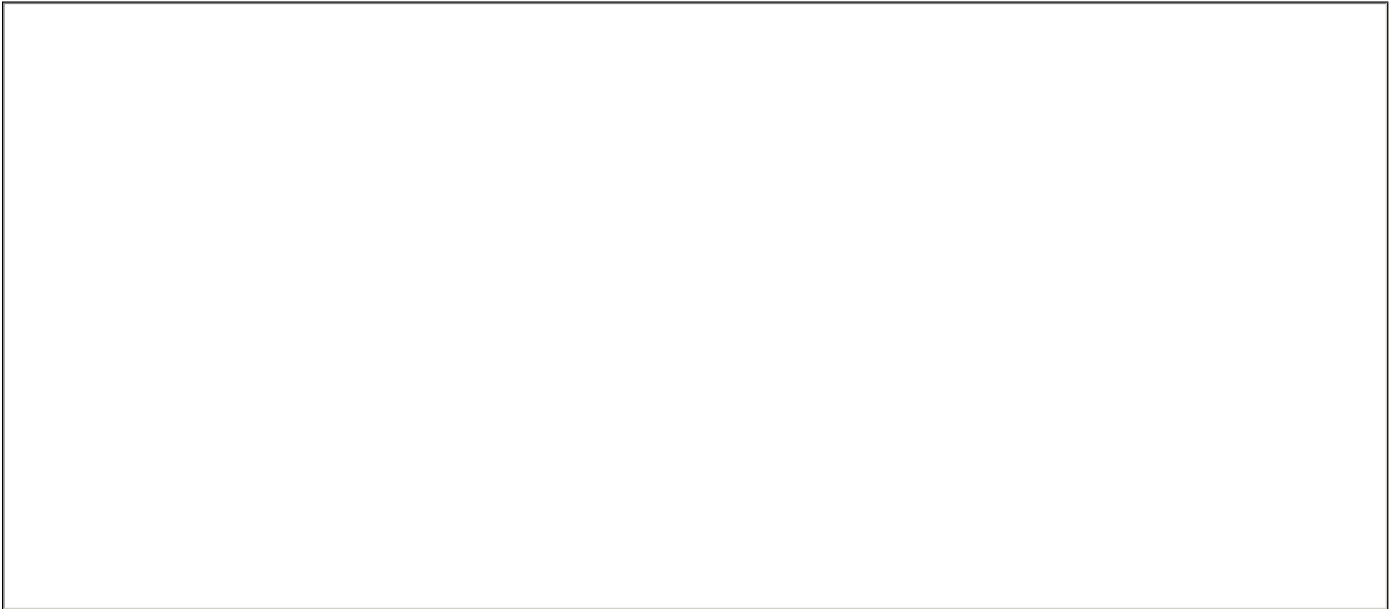
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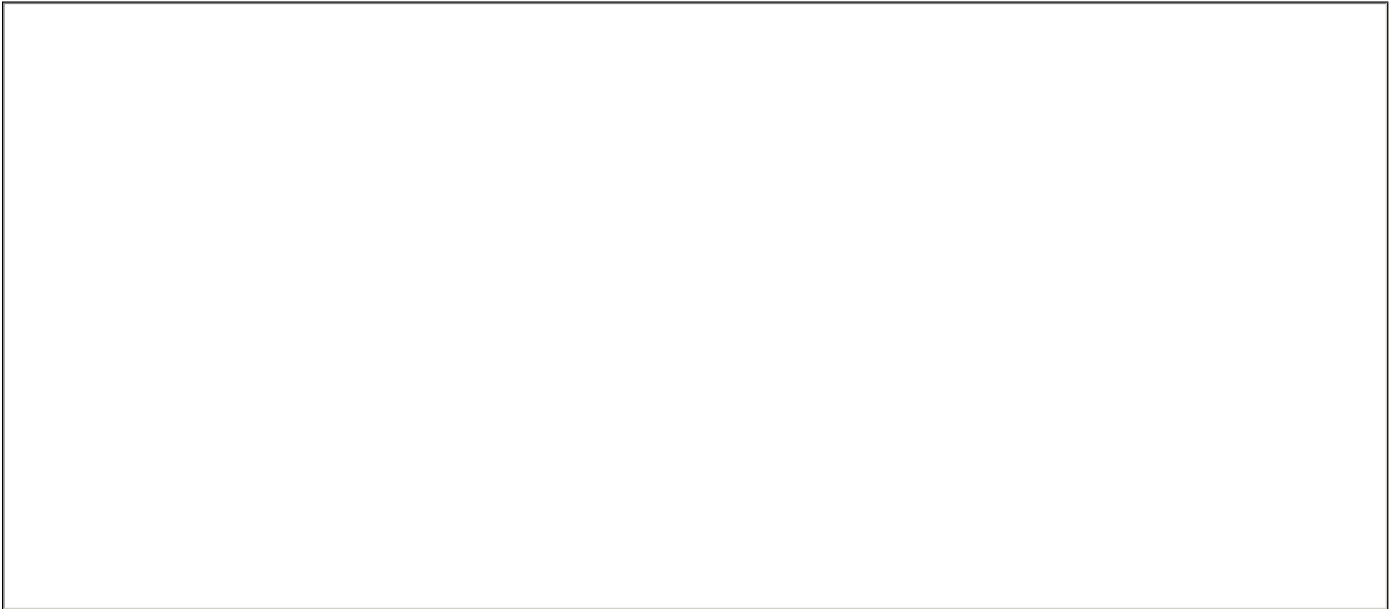
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