

# 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**

## Policy G4

Q4: Logikor understands the need to deliver 10% Biodiversity Net Gain (BNG) and that this will be a national requirement in the coming months. Logikor wish to assert the difficulty in balancing the ability to achieve viable schemes against multiple requirements, particularly in the case of achieving BNG, Urban Green Factor (UGF) and other enhancements on sites required by Policies G1 to G5.

The Council should be conscious of the Government's guidance in relation to BNG where Authority's seek higher BNG quantum over the 10% statutory requirement, particularly Paragraph: 005 Reference ID: 74-005-2023 where it states that:

*Plan-makers may seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development. However, such policies will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.*

Q5: Logikor are concerned that the significant and potentially duplicate requirements of Policies G2 to G5, whilst commendable, results in an unjustified and inappropriately prohibitive approach to achieving ecological enhancement and biodiversity gains on sites in Oxford.