

# 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?

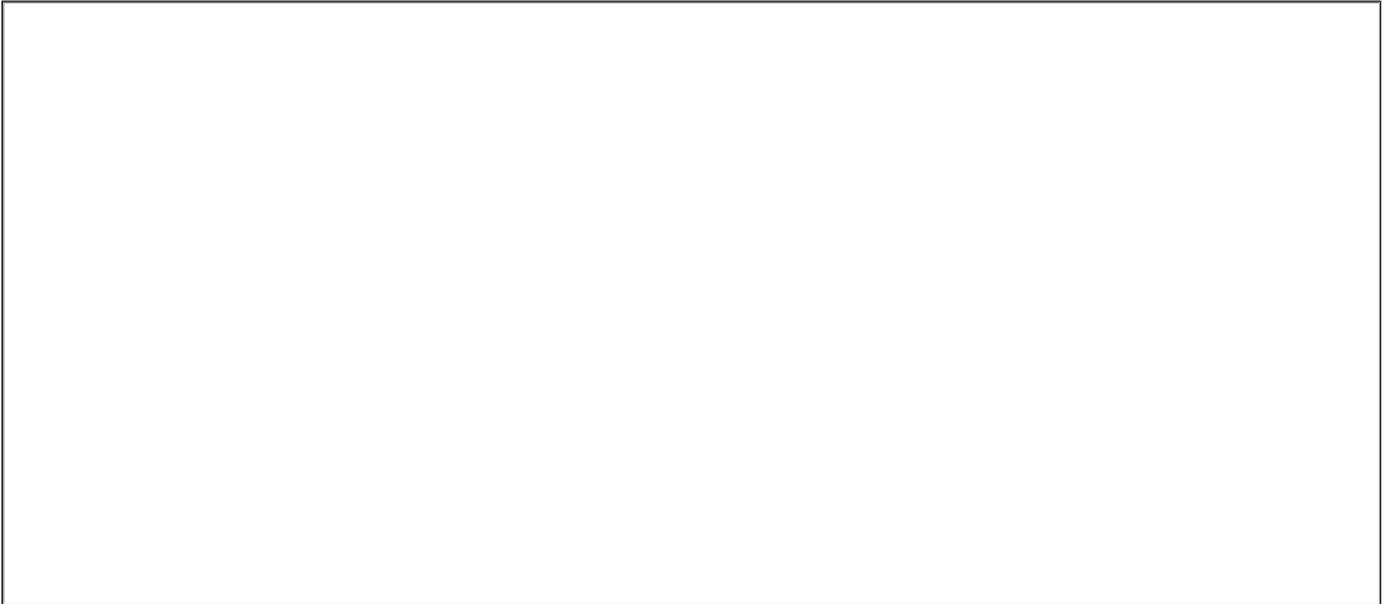
(b) justified?

(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 SPS7

Q4: Logikor strongly support the identification of the Unipart campus as a Category 1 Employment Site, thereby reinforcing the significance of the site as part of the wider economic structure of the city and sub-region.

The wording of the policy establishing a mix of industrial uses, which includes new development, modernisation and intensification of office (Class E), warehousing (Class B8) and general industrial (Class B2) employment uses is supported by Logikor and aligns with their anticipated re-development program for the site.

Logikor wish to reiterate the significance of the Unipart site at Cowley to the economy of Oxford by virtue of its size and location at the edge of the city, which is conducive to the delivery of a diverse range of employment uses, including Class B8 uses.

In line with Policy E1 Employment Strategy, Logikor supports the provision that as a Category 1 employment site, the site should be reserved for employment uses only in order to maintain and strengthen the sites and wider employment areas local and regional significance within the economy.

It is also positive that Class B8 warehouse employment opportunities are considered appropriate for the site as such a use is essential to the local economy as they enable an additional range of direct and indirect employment opportunities that Class E(g) (offices, research and industrial processes) and Class B2 (General Industrial) cannot provide.

Whilst the policy notes that “*an element of residential development ... will be supported*” it is maintained that Site SPS7 is inappropriate for residential development in part, or in whole. The need to avoid the loss of it and the surrounding area as key employment sites permanently to residential is essential. This is needed to ensure that residents of Oxford have sufficient employment opportunities, whilst the integrity of this key employment area isn't compromised to the detriment of the economy of the City and surrounding area.

Whilst the soundness of Policy SPS7 is not questioned by Logikor, there is concern over the effectiveness and consistency with national policy of the policy's wording and guidance. For example, the sub-section of the policy addressing open space, nature and flood risk inappropriately repeats earlier requisite policies of the Plan, as well as obligations as required in statute.

This at odds with the guidance contained at Paragraph 16(f) of the National Planning Policy Framework, where it states; “[Plans should] serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”

The policy should also be careful not inappropriately apply weight to considerations that otherwise that ordinarily be assessed and measured through a planning application, with the policy tests applied at that stage. Although it is understood that the policy needs to apply parameters to assist the implementation of acceptable development, there is a risk that overly prescriptive policy requirements at this stage will stifle development that would otherwise be sustainable.

Q5: Logikor contend that the wording of SPS7 could be reviewed to ensure it is effectively concise and consistent with the requirements of national policy. For example, avoiding repetition of policy and their requirements where they are already stated elsewhere in the Plan. Reference to the delivery to meet market demands, such as the mix of employment land uses, could also be included to ensure that the opportunities of the site's delivery are maximised.

Furthermore, given that some these policies in themselves, such as Policy G5 lacks appropriate justification and consistency with national guidance, policy wording in general should be reviewed to ensure that it is not significantly undermined.