www.oxford.gov.uk

OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Will Charlton

Organisation (if applicable): tor&co

Address: [redacted]

Email:

Date: 11/03/2026

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 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 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.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	○	◉
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 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/oxford-local-plan-2045

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 2045.
- 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

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
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

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	E1, E2, E3, E4, S3, R	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☒ Yes	☐ No
(b) is sound?	☒ 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 or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

N/A

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. It would be helpful if you could suggest revised wording for the policy or text in question.

Please see the attached document:
Oxford Local Plan 2044 Draft Document for Consultation (Regulation 19) - Logicor Cowley Investment Ltd response dated March 2026

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Oxford Local Plan 2042
Draft Document for Consultation
(Regulation 19)



LOGICOR

Logicor Cowley Investment Limited
March 2026

tor
&co

torandco.com

Introduction

tor&co have been appointed by Logicor Cowley Investment Limited (Logicor) to respond to the current Regulation 19 Consultation on the Oxford Local Plan 2042.

Logicor control the site referenced within the draft Local Plan as Key Employment Site "Unipart" (SHLAA Ref 120), which is subject to a specific Policy SPS17.

These representations comprise comment on the following draft policies:

- Policy E1: Employment Strategy
- Policy E2: Warehousing and Storage Uses
- Policy E3: Community Employment and Procurement Plans
- Policy E4: Affordable Workspaces
- Policy S3: Infrastructure Delivery in New Development
- Policy R1: Net Zero Buildings in Operation
- Policy HD6: Views and Building Heights
- Policy SPS17: Unipart Site



DRAFT POLICY E1: EMPLOYMENT STRATEGY

All new development on employment sites needs to show that it is making the best and most efficient use of land and premises, positively promotes sustainable development and does not cause unacceptable environmental impacts.

New employment generating uses:

Planning permission will be granted for the intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre.

Outside of these locations:

a) Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), can only be regenerated with employment generating uses if better and more intensive use is made of the site through the redevelopment, up-grading or re-use of existing under-used buildings, and
b) Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow the sequential approach for new town centre uses as set out in Policy C1.

Planning permission will not be granted for proposals for employment generating uses outside the following locations:

c) Key Employment Sites;
d) the city and district centres;
e) existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class).

Key Employment Sites are listed in Appendix 3.1 and are shown on the policies map. All other employment sites are existing employment sites not designated as Key Employment Sites.

Loss of employment floorspace and the use of employment sites to support housing delivery

Planning permission will not be granted for development that results in a net loss of employment floorspace on Key Employment Sites unless it can be fully justified where:

f) The employment use can be maintained; and
g) The number of jobs in employment generating uses is retained.

Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f))

Proposals involving housing at Key Employment Sites and on existing employment sites not designated as Key Employment Sites will be assessed by a balanced judgement which will take into account the following objectives:

h) Meet as much housing need as possible in sustainable locations;
i) Avoid the loss of, or significant harm to, the continued operation or integrity of successful and/ or locally useful, business and employment sites;
j) Create a pleasant residential environment that provides an acceptable level of amenity for future occupiers;
k) Create a sense of place that is well-connected by safe walking and cycling routes to shops, schools, open spaces, and community facilities and that is well-served by public transport;
l) Secure environmental improvements
m) Avoid locating residential uses in close proximity to existing businesses that may create noise, smells or other potential disturbances as part of the day-to-day operations.

FEEDBACK:

The overarching approach for Policy E1 remains similar to the Regulation 18 Consultation Draft version of the policy, including continued protection of Key Employment Sites, resistance to net loss of employment floorspace on Key Employment Sites and more flexibility for non-designates Sites.

The principles behind the policy are supported, especially the focus on making efficient use of employment land and protecting key employment sites. The protection and intensification of existing employment sites, which will make best use of existing developed / brownfield sites, accords with the assertions of the National Planning Policy Framework (NPPF).

The alternative and more flexible approach, to potentially allow the development of housing on Key Employment Sites and non-designated employment sites is also considered reasonable and appropriate given the pressures on the city to provide for both economic and residential development.

No amendments to the wording of policy are suggested.

DRAFT POLICY E2: WAREHOUSING AND STORAGE USES

Planning permission will only be granted for new or expanded warehousing, storage and distribution uses if it is within an existing Key Employment Site. Development proposals for B8 uses at Key Employment Sites should demonstrate how they will:

a) Enable the continued operation of employment generating uses at that site; and/ or
b) Be brought forward as part of a wider agreed masterplan on sites specifically allocated for B8; and
c) Be delivered in a way that does not result in an adverse impact on residential amenity resulting from an increase in vehicle movements, noise, or dust or smells etc.

Development proposals involving the loss of B8 floorspace (on any Key Employment Site) will need to demonstrate how they comply the loss of floorspace criteria set out in Policy E1.

In addition, planning permission will be granted for the loss of B8 uses (on any Key Employment Site) where it can be demonstrated that:

d) The B8 use is not required to support the continued operation of any Key Employment Site.

FEEDBACK:

The draft policy wording within Regulation 18 Consultation Draft restricted new or expanded warehousing and storage uses to circumstances where they were 'essential to support the operational requirements of that Key Employment Site.'

The Regulation 18 Submission Draft now seeks to allow Class B8 (Storage or Distribution) uses within existing Key Employment Sites, subject to a set criteria. Despite the amendment, Policy E2 therefore remains restrictive and does not reflect potential for a diverse range of significant employment uses.

It is, however, noted that whilst Policy E2 continues to limit Class B8 uses at Key Employment Sites, the 'Unipart Site' (which is dealt with under Policy SPS17) doesn't limit Class B8 uses. Given the nature and scale of available land at the 'Unipart Site' this lack of restriction is welcomed.

DRAFT POLICY E3: COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS

Planning permission will only be granted for proposals of 50 or more dwellings (or the number of rooms in student/ communal accommodation that equate to this when the relevant ratio is applied) or 5,000sqm (GIA) or more non-residential floorspace where they are supported by a Community Employment and Procurement Plan (CEPP). The CEPP must identify the opportunities that will be provided by the development to support the inclusive economy, demonstrate the social value of the proposals and set out how they will be promoted and delivered. CEPPs will be expected to demonstrate consideration of all the following measures:

a) Securing construction jobs for local residents;
b) Providing construction apprenticeships and/or training opportunities for local residents;
c) Linking with local schools and colleges;
d) Securing jobs in the operational/ end-user phase for local residents;
e) Procuring a proportion of on-going supply chain needs locally;
f) Paying all employees (other than apprentices, although this is encouraged where possible) the Oxford Living Wage;
g) Only using contractors who commit to paying the Oxford Living Wage
h) Procuring a proportion of construction materials locally; and
i) Delivery of affordable workspaces.

The City Council will usually use a legal agreement to secure these commitments in accordance with a site-specific CEPP.

Smaller developments (proposals for major development below the threshold for a CEPP) will be expected to provide a written statement in support of their planning application to show what job opportunities, and/or skills and training prospects can be delivered during the construction and or end-user phase of the development.

FEEDBACK:

Policy E3 remains consistent with the Regulation 18 Consultation Draft wording and the requirement for Community Employment and Procurement Plans for larger development proposals exceeding specified residential or non-residential thresholds remains.

The threshold for non-residential floorspace has increased which is supported, however the policy should allow more flexibility and not make Community Employment and Procurement Plans a policy requirement for all major development proposals, as previously suggested.

The previously proposed ‘Alternative Option 1’ as a policy requirement still remains the preferred option as it notes that applicants are encouraged to submit a Community Employment and Procurement Plans alongside all major development proposals but it isn’t a policy requirement.

Therefore, it is recommended that the policy is amended to encourage, not mandatory require such Plans. This will provide flexibility and ensure the policy is practicable for developers and viability.

DRAFT POLICY E4: AFFORDABLE WORKSPACES

Development proposals delivering a net gain of 5,000 sqm GIA or more employment generating uses (or flexible E-Class uses which could be used for employment generating uses) on the following sites are expected to produce an affordable workspace strategy:

a) ARC Oxford
b) Oxford Science Park
c) Oxpens
d) Osney Mead
e) Nuffield Sites
f) Kassam Stadium and Ozone Leisure Park
g) Unipart
h) Oxford North
i) Red Barn Farm
j) Botley Road Retail Park

Details of the size, marketing, servicing, management and how the space provided will meet end-user requirements, should be set out in an Affordable Workspace Strategy (AWS). The AWS should explain how the proposed provision helps to overcome market failures that would otherwise prevent beneficial workspace typologies (as identified in the glossary definition) from coming forward.

The City Council will usually use a legal agreement to secure these commitments in accordance with a site-specific AWS.

Affordable workspace that is brought forward in accordance with an agreed site-wide masterplan is encouraged.

FEEDBACK:

Since the Regulation 18 Consultation Draft the wording of Policy E4 remains mostly unchanged. However, the inclusion of the wording *'Affordable workspace that is brought forward in accordance with an agreed site-wide masterplan is encouraged',* is supported as it promotes the delivery of affordable workspace where appropriate.

There is, however, a concern that the policy wording lacks clarity on how the requirements would apply to manufacturing / research units, and logistics units for sites like Unipart. This needs to be addressed still as it is difficult for manufacturing / logistic units to integrate affordable workspaces unlike other uses such as office space. It is therefore proposed, the wording of Policy E4 needs to provide more clarity on specific uses providing affordable workspaces.

DRAFT POLICY S3: INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT

The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. The projects required to support the Local Plan strategy are identified within the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be reviewed to ensure infrastructure information remains up to date and is monitored effectively.

Developers will be expected to engage early with the Council and infrastructure service providers to discuss their requirements. Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the city, opportunities should be taken to maximise infrastructure provision on suitable sites.

Development proposals, including those allocated in this Local Plan that give rise to a need for infrastructure improvements, will be expected to mitigate their impact, both individually and cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development. The standards of infrastructure delivery will be expected to comply with other policies set out within this Plan.

Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development. Infrastructure identified within the Infrastructure Delivery Plan or through negotiations on individual planning applications will be delivered either through on-site provision or off-site contributions and secured by S106, S278 or other appropriate agreements and the Community Infrastructure Levy (CIL) or its successor as well as other identified sources of funding as set out in the Infrastructure Delivery Plan.

Development proposals which rely on the delivery of critical infrastructure projects to support the development, will only be permitted prior to completion of that project or where appropriate, a phase of that project which has been identified as necessary in the IDP, where the council is content that the infrastructure or phase of that infrastructure will be in place within a reasonable timetable from the date of permission.

Proposals to enhance the city's rail and bus network will be supported. In particular, proposals for improvements to Oxford Railway Station that increase network capacity and support the Cowley Branch Line (CBL) will be supported. Oxford Railway Station should be transformed to facilitate integrated transport with enhanced entrances, additional secure cycle storage, cycle racks, new bus interchange facilities and new priority public areas.

Enhancements to public transport accessibility in the south-east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the Cowley Branch Line to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL. Outside the 1,500m buffer area, financial contributions from new trip-generating development would be sought on a case-by-case basis. These will be tested in accordance with Paragraph 58 (or updated equivalent) of the NPPF.

FEEDBACK:

Policy S3 highlights the general infrastructure delivery framework but places greater emphasis in the Regulation 19 Submission Draft on contributions towards strategic transport infrastructure, including the Cowley Branch Line.

The policy identifies financial contribution will be expected from trip-generating development within a 1,500 metre buffer zone of the proposed Cowley Branch Line stations. It is recommend that the importance of enhancing sustainable connectivity is recognised, however, infrastructure contributions must comply with each development. It is understood the Council will apply this on a case-by-case basis.

Guidance is therefore required to ensure that contributions towards the Cowley Branch Line and related infrastructure are proportionate and fairly distributed within development proposals.

DRAFT POLICY R1: NET ZERO BUILDINGS IN OPERATION

All new buildings should be net zero carbon in operation. This must be demonstrated through submission of an Energy and Carbon Statement that details how all the criteria below have been met:

a) *Developments have been designed in accordance with the energy hierarchy. Applications should demonstrate how design has methodically followed the steps in the hierarchy, firstly through reducing energy use; using energy efficiently; and then, meeting all energy needs through renewables sources, ideally generated onsite, or else offsetting as a last resort.*
b) *A total Energy Use Intensity (EUI) figure for the development has been provided, calculated using an approved methodology as set out in supporting text. Developments will not be permitted where they exceed the following Energy Use Intensity targets (unless demonstrated to be technically unfeasible):*
    i. *Residential: 45 kwh/m2/yr*
    ii. *Non-residential: 70 kwh/m2/yr*
    iii. *For non-residential uses with exceptionally high energy demands, including R&D/labs/hospitals, a higher EUI target will be accepted where it can be robustly justified, including the measures taken to limit this.*
c) *Space heating demand is no more than 20 kwh/m2/yr. Emerging best practice suggests 15kwh/m2/yr will be achievable in many instances and achieving this tighter limit is encouraged.*
d) *No fossil fuels are being directly utilised in the operation of the development (i.e. no gas used for heating and cooking).*
e) *All energy needs (matching the development's total EUI figure) will be met through onsite renewable energy generating technologies in the first instance, accompanied by energy storage where possible. Where the total energy need cannot be met through onsite renewables, applicants should seek to maximise available capacity onsite, before seeking to meet the remaining energy balance through installation of sufficient additional renewable generation at a location offsite. In these circumstances, it will need to be demonstrated in the Energy and Carbon Statement that offsite provision has been fully secured and will be in operation upon completion of the development.*
    As a last resort, where the above steps have been fully explored and net zero carbon still cannot be fully delivered, offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location. The City Council will accept payment into its offsetting fund to fully offset this remaining energy demand, and this will be secured through an appropriate legal agreement/S106.
f) *All new development must include information that specifies the approach to metering that will be adopted as well as proposed monitoring of the performance of the development to be undertaken post-completion (to ensure performance is in line with design specifications).*

Householder applications are only expected to demonstrate accordance with criteria a). Proposals for conversions, and change of use (where they include works to the fabric of the building to facilitate this) that would require planning permission are only expected to demonstrate accordance with criteria a) and d), unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply. Extensions are expected to comply with criteria a), b) and c) unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply.

The development of low carbon energy centres and heat networks of varying scales will be supported where these can offer more sustainable heating choices and are in keeping with other policies in the Local Plan. Where development comes forward in areas with access to a heat network, now or in the future, connection into the network should be considered as part of the design process, particularly if this offers more sustainable means of heating/powering the building.

The City Council will expect that, having worked through requirements a) to f), Energy and Carbon Statements demonstrate compliance with the above criteria; however, a case for anything short of full compliance will be expected to be clearly justified as follows:

g) Full details of where a criterion cannot be met will be provided and justified within the Energy and Carbon Statement with explanation of the reasonable attempts to meet it provided; and
h) Clarification that all other criteria are met or exceeded; and
i) The proposal is overall net zero carbon in operation (meaning no reliance on fossil fuels and including use of offsetting only as a last resort).

FEEDBACK:

Policy R1 maintains the need from the Regulation 18 Consultation Draft for buildings to be net zero carbon in operation.

Whilst supportive of the ambitions and need to achieve net zero carbon buildings, the need for flexibility within Policy R1 wording is still considered to be required, as the Policy remains too rigid.

As stated in the consultation for the Regulation 18 Consultation Draft response, a more flexible approach is supported, focusing on regulated energy which encourages additional measures for unregulated energy rather than it being a requirement. The alternative option previously proposed allows developers to focus on regulated energy, avoiding impractical on-site renewable requirements and enabling a more feasible route to net zero.

DRAFT POLICY HD6: VIEWS AND BUILDING HEIGHTS

Planning permission will only be granted for development that will retain or enhance the special significance of views of the historic skyline of the Historic Core Area.

Planning permission will be granted for developments of appropriate height or massing. If the proposal is for development above the prevailing heights of the area and could impact on character or views, the application must demonstrate how all of the following criteria have been met:

- *a) Design choices regarding height and massing have a clear design rationale; and*
- *b) The guidance on design of higher buildings set out in the High Buildings Study TAN has been applied. In particular, the impacts in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character should be explained; and*
- *c) Proposals have been designed to have a positive impact on important views including both into the historic skyline and out towards Oxford's green setting, through their massing, orientation, the relation of the building to the street, and detailed design features including roofline and materials (including colour); and*
- *d) Taller buildings have been designed and orientated to avoid potential negative impacts, including on neighbouring amenity, such as overshadowing, overbearing and overlooking, reduced internal daylight and sunlight and wind-tunnel effects.*

The area within a 1,200 metre radius of Carfax tower (the Historic Core Area) contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m (60ft) in height or ordnance datum (height above sea level) 79.3m (260ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height must be limited in bulk and must be of the highest design quality.

Applications for any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher) will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:

- *e) A Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible (produced in accordance with the Landscape Institute's GLVIA 3d Edition and Technical Guidance note TGN 06 19 or updated equivalents); and*
- *f) Use of VuCity 3D modelling (or equivalent if updated by the City Council in future), shared with the City Council so that the impact of the development can be understood from different locations, including any view cone views that are affected; and*

g) A heritage impact assessment if the proposal would harm the significance of a designated heritage asset including through development in its setting (or a group of assets and their settings) informed by the methodology outlined in the Assessment of the Oxford View Cones report, a full explanation of other options that have been considered that may be less harmful, how that harm has been avoided or minimised, a justification that the benefits outweigh the harm and open book viability assessment if relied upon in the explanation.

Any proposals within the Historic Core Area or the View Cones that may impact on the foreground of views and roofscape (including proposals where they are below the Carfax datum point, for example plant) should be designed carefully, and should meet the following criteria:

h) They are based on a clear understanding of characteristic positive aspects of roofscape in the area; and
i) They contribute positively to the roofscape, to enhance any significant long views the development may be part of and also the experience at street level.

Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view. The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map.

FEEDBACK:

Policy HD6, which was previously draft Policy HD9 within the Regulation 18 Consultation Draft, remains consistent and mostly unchanged from the previous draft.

It is understood that the 'Unipart Site' (Policy SPS17) is not located within a protected View Cone, (Assessment of the Oxford View Cones 2015 Report) which would mean that Policy HD6 should not need to be taken into account when considering the sites redevelopment. However, a more flexible approach which does not restrict good design, and sustainable development should be noted.

POLICY SPS17: UNIPART SITE

Planning permission will be granted for new development, modernisation and intensification of logistics/industrial uses including Industrial (class B2), and storage or distribution (class B8) with ancillary offices, research and industrial processes (class E) uses. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Proposals should take opportunities to integrate a network of green spaces and other features across the site that can have benefits for occupants of the site as well as wildlife which will help to achieve the Urban Greening Factor policy target. Block arrangements and design of outdoor spaces could seek to incorporate a variety of features including functional open spaces; trees and hedges as well as linear features that can facilitate movement through the site and integrate with surrounding areas, utilising the potential to enhance the wildlife corridor function of the railway line in this location, for example.

b) Proposals should explore ways to incorporate planting of native trees and hedgerows to screen buildings, soften industrial activity, and that respond to the sensitivity of the site's borders.

c) Proposals should seek to reduce levels of hard landscaping and integrate more natural surface cover across the site including through integration of Sustainable Drainage Systems which can also secure betterment in surface water flood risk.

d) An undeveloped buffer zone of at least 10m width should be left alongside the watercourse (Policy G2). Opportunities to open up access and enhance connections from the watercourse into and across the site could improve amenity and movement for occupants of the site as well as wildlife.

e) Surveys may be required to determine any species or habitats of value, particularly around the edges of the site and within the area of scrub to the north-east in advance of any redevelopment.

f) Some pockets of land along railway line and also in a strip running north to south across part of site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity.
Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) The site would benefit from a comprehensive masterplan to co-ordinate its development and provide a framework for the future modernisation and intensification and to positively promote sustainable development.

h) The site is located between the predominantly industrial character of areas to the west and the more open nature of the areas to the east, this should be a key consideration informing choices about densities, scale and massing of development proposed. Opportunities to sensitively balance and transition between the differing characters of the surrounding areas whilst avoiding the creation of hard edges to the landscape should be explored.

i) Taking into account the current built form on the site, densities and footprints of buildings should vary across the site. This might include arranging higher densities of development towards the north and west, whilst seeking to achieve a looser and more fine-grained arrangement towards the south and east to ensure that a continuous hard edge to the southern and eastern boundaries isn't created.
j) Variations in high quality materials, including selection of materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.
k) Design of new development should respond to the allocation of the land at Northfield on the southern edge of the site (within South Oxfordshire) and any proposals arising there in due course, in particular, considering walk, cycle and wheel links to future transport infrastructure provision.
*l) The site has potential for sensitive archaeology in the form of prehistoric and/or Roman remains. Proposals should ensure that these archaeological assets are appropriately investigated and responded to (**Policy HD5**).*

Movement & access

m) Block arrangements and layout of new development should be designed in a way that secures improved movement and circulation through the site, particularly via active transport modes like walking, cycling and wheeling.
n) Applicants should seek opportunities to improve access into the site, e.g. by exploring potential for new access points along southern boundaries or in the northeast towards Oxford Road, as well as opportunities to support sustainable travel by providing new or improved walk, cycle and wheel links to existing and planned developments in the area, including that adjoining in South Oxfordshire district.
o) Proposals should also explore ways to improve public transport links and services, including opportunities to integrate connectivity of the site with new stations associated with the re-opening of the Cowley Branch Line to passengers.

Additional requirements

*p) Because of the existing and previous uses of the site, some areas of potential contamination are likely present on the site. Proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).*

FEEDBACK:

The Regulation 19 Submission Draft included Areas of Focus for development, including the Cowley Branch Line, Littlemore and The Leys Area of Focus. This area contained several of the city's key employment sites with the Unipart Site adjacent to the Area of Focus

The sites acceptability for Industrial (Class B2), and Storage or Distribution (Class B8) uses with ancillary offices, together with Research and Industrial Processes (Class E) uses and other complementary uses is supported.

Logicor are also exploring measures to currently improve the use of the site and the policy principles and site-specific requirements of Policy SPS17 remain consistent and are considered acceptable.

London
Birmingham
Bournemouth
Bristol

0203 664 6755
enquiries@torandco.com
torandco.com

All rights reserved.

No part of this document may be reproduced in any form or stored in a retrieval system without the prior written consent of the copyright holder.

©tor&co 2026

tor &co

Carbon Neutral Organisation