



Examination of the Oxford Local Plan
2045 – MIQ for Stage 1

Matter 2 Written Statement – ‘Housing and Employment Needs’

8 October 2026

On behalf of **Logicor Cowley Investments Limited**

Respondent ID: 117

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1 Introduction and Scope

- 1.1 This Written Statement has been prepared by Quod on behalf of Logikor Cowley Investments Limited ('Logikor') (Respondent 117) in respect of the Oxford Local Plan 2045 ('the Plan') Examination. It is submitted in accordance with paragraph 28 of the Inspectors' Guidance Note (ID.005).
- 1.2 The Plan was submitted to the Secretary of State for Examination on 14 July 2026. In accordance with the transitional arrangements set out in Annex A of the National Planning Policy Framework ('NPPF') published on 17 August 2026, the Plan is being examined against the NPPF published in December 2024. All references to the NPPF in this Statement are therefore to the December 2024 version, and the Plan's soundness is considered against the tests set out at paragraph 36 of the 2024 document.
- 1.3 Logikor controls the Unipart site at Watlington Road / Garsington Road, Cowley ('the Site'). The Site extends to approximately 32 hectares. The Site is designated as a Category 1 Employment Site in the adopted Oxford Local Plan 2036 (June 2020) as per Policy E1 (Employment Sites) and Policy SP7 (Unipart). The Site is designated as a Key Employment Site in the Plan submitted for Examination under Policy E1 (Employment Strategy) and Policy SPS17 (Unipart Site).
- 1.4 The Key Employment Site designation protects the Site for employment use within Use Classes B2, B8 and E, and supports its modernisation and intensification where appropriate. Key Employment Site designations are intended to protect and support existing employment land rather than allocate land to meet a specified quantum of employment need. Unlike allocations, the Key Employment Sites do not identify a floorspace requirement, and Policy SPS17 therefore appropriately does not set a target for net additional floorspace on the Site. There is no new land identified (i.e. no new employment allocations) in the Plan for Use Class B2 or Use Class B8 floorspace.
- 1.5 This Statement should be read in conjunction with the Regulation 19 representations submitted on behalf of Logikor by tor&co dated 11 March 2026. Logikor's Regulation 19 representations supported the principle of Policy E1 (Employment Strategy), the protection of Key Employment Sites, and supported Policy SPS17 (Unipart Site). Those representations however objected to Policy E2 (Warehousing, Storage and Distribution Uses) as unsound (not justified), on the basis that Policy E2 is restrictive and does not reflect the potential for a diverse range of significant employment uses to come forward across the City.
- 1.6 In accordance with paragraph 26 of the Inspectors' Guidance Note (ID.005), this Statement responds only to Matter 2 'Housing and Employment Needs', Issue 6 'Employment Land Needs – Policy E1', Question 4, which relates directly to Logikor's Regulation 19 representations on Policy E2, as detailed in Table 1.1:

Table 1.1: Summary of Questions Responded To

No.	Question
4	How will the needs for storage and distribution uses be met over the plan period?

1.7 Logikor has also submitted a Hearing Statement in respect of Matter 3 ‘Spatial Strategy and Approach to Development’, Issue 4 ‘Employment Strategy – Policies E1 and E2’, which addresses Policies E1 and E2 in more detail and sets out the modifications sought. To avoid duplication, this Statement summarises Logikor’s position on Question 4 and cross-refers to the Matter 3 Hearing Statement where relevant. The two Statements should be read together.

1.8 In summary, Logikor’s position is that:

- The Employment Land Needs Assessment identifies a minimum need for 46,086 sqm of storage and distribution floorspace over the Plan period, which is the largest unmet need of any employment Use Class.
- The Plan does not identify any new land for storage and distribution floorspace, and does not set out how, where or when that need will be met. It relies on the need being absorbed within Oxford’s existing employment sites, without evidence of capacities or a delivery trajectory.
- As drafted, Policies E1 and E2 restrict rather than enable the delivery of storage and distribution floorspace. In this respect the Plan is not positively prepared, justified or effective, and is inconsistent with paragraphs 86 and 87 of the NPPF.
- The need should be met through a flexible policy framework which supports storage and distribution development on Key Employment Sites, on existing employment sites and on non-designated land where impacts are acceptable, rather than through site-specific floorspace requirements on designated sites.

2 Response to the Inspectors' Question within Issue 6: Employment Land Needs

2.1 Question 4

2.1.1 Question 4 asks:

"How will the needs for storage and distribution uses be met over the plan period?"

- 2.1.2 The Employment Land Needs Assessment ('ELNA') (Rapleys, January 2026) identifies a minimum need for 46,086 sqm of net additional storage and distribution (Use Class B8) floorspace over the period 2025 to 2045 (ECON.001, Tables 6.5, 6.10 and 8.1), which is carried into the supporting text to Policy E1. Against commitments of only 123 sqm, this leaves a balance of circa 46,000 sqm (ECON.001, Table 8.1), which is the largest unmet balance of any employment Use Class identified in the ELNA. Logikor does not dispute the identified need, and notes that it is a minimum requirement that should not be treated as a ceiling on provision.
- 2.1.3 The Plan does not identify any new land for Use Class B8 (or Use Class B2) floorspace. The supporting text to Policy E1 explains that the strategy seeks to modernise and intensify existing employment sites so that the identified employment floorspace need can be met *"without using additional sites"*. The ELNA similarly concludes that the storage and distribution need can be *"absorbed within Oxford's existing employment portfolio"*. However, the Plan identifies no sites, capacities or delivery trajectory to support that conclusion.
- 2.1.4 The Council's own evidence base indicates that the existing employment land portfolio has very limited capacity to absorb additional storage and distribution floorspace. The ELNA:
- Records industrial and warehouse vacancy rates of circa 1.4%, against a healthy level of circa 5 to 7.5%, equating to around five months' supply; and
 - Notes that Oxford's industrial stock has fallen by around 25% since 2001 with no new significant industrial or warehouse development for circa 25 years.
- 2.1.5 The modernisation and intensification of the Key Employment Sites will be important in maintaining and improving the quality of Oxford's employment stock. However, it cannot be assumed to deliver substantial net additional storage and distribution floorspace. Intensification is about more than floorspace – on large, established sites it is as likely to take the form of more efficient layouts, higher-specification buildings, improved servicing and more productive uses as net additional floorspace. Site-specific policies, including Policy SPS17, also anticipate more green infrastructure, landscaping and watercourse buffers, as well as lower densities in parts of sites, which may reduce rather than increase floorspace. Key Employment Sites are designated to protect and support employment use, not allocated to deliver a specific quantum of floorspace, and it would be neither justified nor effective to rely on them to accommodate the full need.
- 2.1.6 Rather than enabling the need to be met, the policies of the Plan as currently drafted may inadvertently restrict the delivery of storage and distribution floorspace for the following reasons:

- Policy E2 permits new or expanded storage and distribution uses only on Key Employment Sites, and then only where they enable the continued operation of other employment uses (criterion a)) or form part of a masterplan on sites “*specifically allocated for B8*” (criterion b)), although no such sites are allocated. The supporting text states that such uses “*do not generally make for an intensive land-use*”, which understates the role of a sector that paragraph 86 c) of the NPPF specifically identifies.
- Policy E1 does not permit employment generating uses outside of Key Employment Sites, the city and district centres and existing employment sites (criteria c) to e)), and requires additional floorspace on existing employment sites not designated as Key Employment Sites to follow the sequential approach for town centre uses (criterion b)). There is therefore no policy route for storage and distribution development, or any employment development for that matter, on non-designated land, even where a need is demonstrated.
- Policy E1 also supports the loss of existing employment sites not designated as Key Employment Sites to other uses, including housing, which would further reduce the portfolio the Plan relies upon to absorb the need for employment development that has been identified.

2.1.7 Taken together, the Plan relies on existing employment sites to absorb a substantial storage and distribution need, while restricting where and how such floorspace can come forward and providing no route outside it.

2.1.8 In relation to Question 4, the Plan is therefore not positively prepared, justified or effective. It is also inconsistent with paragraphs 86 c) to e) of the NPPF and with paragraph 87 b), which requires planning policies to make provision for “*storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods*”.

2.1.9 In Logicator’s view, the need for storage and distribution floorspace can only be met effectively over the Plan period through a flexible, criteria-based policy framework which:

- Supports storage and distribution development on Key Employment Sites, without imposing site-specific floorspace requirements;
- Supports storage and distribution development on existing employment sites, without the need to apply a sequential test;
- Supports employment development, including storage and distribution, on non-designated land where there would be no adverse impacts on the environment, on amenity (including residential) or on the highway network that cannot be appropriately mitigated;
- Retains existing employment land, rather than supporting its release to housing while the need for storage and distribution uses, as well as other employment uses, remains unmet; and
- Confirms that the identified need is a minimum, allows proposals to respond to need demonstrated through market signals such as vacancy, take-up and occupier

demand, and commits the Council to monitoring the delivery of storage and distribution floorspace over the Plan period.

- 2.1.10 This approach would be consistent with paragraph 86 b) of the NPPF, which expects planning policies to set criteria, or identify strategic sites, for local and inward investment to meet anticipated needs over the Plan period, and with paragraph 86 e), which requires policies to be flexible enough to accommodate needs not anticipated in the Plan.

3 Modifications Sought

3.1 Logicator's suggested modifications to Policies E1 and E2 and their supporting text are set out in full in Table 3.1 of its Matter 3 Hearing Statement and are not repeated here. In summary, they comprise:

- **Modification 1:** The deletion of criteria b) to e) of Policy E1 and their replacement with a new policy criterion supporting employment development on non-designated land where there would be no adverse impacts on the environment, on amenity or on the highway network that cannot be appropriately mitigated;
- **Modification 2:** The deletion of criterion g) and of the parts of Policy E1 which support the release of existing employment sites to housing, together with new supporting text on the assessment of the redevelopment and intensification of Key Employment Sites;
- **Modification 3:** If Policy E2 is retained, amendments to its opening text and policy criteria so that storage and distribution development is supported on Key Employment Sites, existing employment sites and other suitable sites where a need is demonstrated; and
- **Modification 4:** If retained, new supporting text to Policy E2 confirming that the identified need for storage and distribution floorspace in the ELNA is a minimum, how it is expected to be met, and that its delivery will be monitored.

3.2 Together, these modifications would provide a clear and effective answer to how the need for storage and distribution uses will be met over the Plan period, and would enable the Plan to be found sound in this respect.

4 Participation in Hearings

- 4.1 Noting that the matters raised in this Statement are more appropriately discussed under Matter 3, Logikor does not seek to participate in the Matter 2 hearing session on Wednesday 21 October 2026.
- 4.2 This Written Statement is submitted in accordance with paragraph 28 of the Inspectors' Guidance Note (ID.005), and Logikor trusts that it will be taken into account by the Inspectors.
- 4.3 Logikor has requested to participate in the Matter 3, Issue 4 (Employment Strategy – Policies E1 and E2) session on Thursday 22 October 2026 (afternoon), where it would be pleased to assist the Inspectors on the matters raised in this Statement and in the Matter 3 Hearing Statement.



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