



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

Matter 3 Hearing Statement – ‘Spatial Strategy and Approach to Development’

8 October 2026

On behalf of Logicor Cowley Investments Limited

Respondent ID: 117

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1 Introduction and Scope

- 1.1 This Hearing 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.
- 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.
- 1.5 Note, there is no new land identified (i.e. no new employment allocations) in the Plan for Use Class B2 or Use Class B8 floorspace.
- 1.6 Site-specific matters relating to Policy SPS17 (Unipart Site) will be addressed at the Stage 2 hearings and are not included within this Statement.
- 1.7 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.
- 1.8 In accordance with paragraph 26 of the Inspectors' Guidance Note (ID.005), this Statement responds only to those questions under Matter 3 'Spatial Strategy and Approach to Development', Issue 4 'Employment Strategy – Policies E1 and E2' that relate directly to Logikor's Regulation 19 representations, together with Questions 1 and 2, which bear directly on how the need for storage and distribution floorspace underpinning those representations will be met, as detailed in Table 1.1:

Table 1.1: Summary of Questions Responded To

No.	Question
1	What is the justification for restricting employment generating uses outside Key Employment Sites, city and district centres and existing lawful employment sites?
2	What is the justification for requiring employment proposals outside Key Employment Sites and city and district centres to “ <i>follow the sequential approach for new town centre uses</i> ”?
3	Background Paper 004a (Key Employment Sites Methodology) describes how a quantitative assessment was used, along with professional judgement, to determine if sites should be designated as Key Employment Sites. As part of this process, how and why was a score of 36 points used?
4	Are the Key Employment Sites justified and was the process of designation based on appropriate available evidence?
6	Where the redevelopment of Key Employment Sites is concerned, what is the justification for maintaining employment uses and the retaining the number of jobs in employment? How would job numbers be established and is the policy justified and effective?
7	How does Policy E2 reflect the identified need for warehousing, storage and distribution in Oxford?
8	How much additional floorspace for warehousing, storage and distribution is proposed? How does this relate to need?

1.9 Logicator’s position on the supply of storage and distribution floorspace, which is also relevant to Matter 2, ‘Housing and Employment Needs’, Issue 6 ‘Employment Land Needs – Policy E1’, Question 4 (“*How will the needs for storage and distribution uses be met over the Plan period*”), is set out in response to Questions 7 and 8 in Section 2. A copy of Logicator’s separate Matter 2 Written Statement is included at Appendix 1.

1.10 In summary, Logicator’s position is that:

- The designation of the Site as a Key Employment Site is justified and should be retained.
- The Council’s evidence identifies a minimum need for 46,086 sqm of warehousing, storage and distribution floorspace (ECON.001, Tables 6.5, 6.10 and 8.1), but the Plan has not identified sufficient land to meet that need nor does it set out how that need will be met (e.g. via policy tests for non-allocated and non-designated land). To be consistent with paragraphs 86 c) to e) of the NPPF, the Council’s policy approach to employment development needs to facilitate development that will help to meet the needs of a modern economy, seek to address potential barriers to future investment,

and be flexible enough to accommodate needs not anticipated in the Plan. In Logikor's view, this means supporting the modernisation and intensification of the Key Employment Sites without imposing site-specific floorspace requirements, and enabling employment development to come forward on existing employment sites and non-designated land where there would be no unacceptable environmental, amenity or highway impacts.

- In response to the Inspectors' Questions 1 and 2, criterion b) of Policy E1 (Employment Strategy), and the restriction on employment generating uses outside the locations listed at criteria c) to e), are unnecessarily restrictive and inconsistent with the NPPF. To the contrary, these criteria should be removed and replaced with a new part of Policy E1 which supports employment development on non-allocated and non-designated land where there would be no adverse environmental or amenity impacts that cannot be mitigated, which would better enable the Plan to be capable of being found to be sound noting the outstanding Use Class B8 need.
- In response to the Inspectors' Question 6, the parts of Policy E1 which support the release of existing employment sites to housing (within the section headed 'Loss of employment floorspace and the use of employment sites to support housing delivery') should be removed. The Council has not identified sufficient land to meet its identified employment needs, and the Plan should not support the release of existing employment sites to housing while a shortfall remains, and more so while there is no policy ability to deliver employment floorspace on non-allocated or non-designated employment land. The job retention requirement at criterion g) should not be applied as a policy test, as it has the potential to restrict the modernisation of Key Employment Sites for uses that maintain their employment function but operate at different employment densities. Instead, the supporting text should ensure that the redevelopment or intensification of Key Employment Sites is assessed against a wider range of measures than employee numbers alone, including job quality, productivity, investment and need for the type of employment use.
- Logikor questions whether a separate Policy E2 is necessary at all. However, if retained, Policy E2 (Warehousing, Storage and Distribution Uses) should be modified so that it positively supports B8 development and related modern economy uses at a variety of scales, including where a need is demonstrated through market signals, rather than treating them as permissible only when in support of other employment uses.

2 Response to the Inspectors' Questions within Issue 4: Employment Strategy

2.1 Questions 1 and 2

2.1.1 Questions 1 and 2 ask:

"What is the justification for restricting employment generating uses outside Key Employment Sites, city and district centres and existing lawful employment sites?"

"What is the justification for requiring employment proposals outside Key Employment Sites and city and district centres to 'follow the sequential approach for new town centre uses'?"

2.1.2 Criterion b) of Policy E1 and the restriction on employment-generating uses outside the locations identified in criteria c) to e) are unjustified and inconsistent with national policy. The Plan has not identified sufficient land to meet the employment needs identified in its evidence base, and these provisions would further constrain the delivery of employment floorspace when the Plan already restricts delivery to designated sites only.

2.1.3 Criterion b) requires proposals for additional employment floorspace on existing employment sites outside the city and district centres, which are not designated as Key Employment Sites, to follow the sequential approach for new town centre uses set out in Policy C1 (City, District and Local Centres). Industrial, storage and distribution uses are not main town centre uses as defined in Annex 2 of the NPPF, and the sequential test is not an appropriate mechanism for directing them. Requiring applicants to demonstrate that employment floorspace cannot be accommodated in a sequentially preferable location before development can be supported is neither proportionate nor justified, particularly in a city where no development opportunities for new industrial or warehousing space have been identified. Criterion b) therefore represents an unnecessary barrier to employment growth on existing employment land and could impede the delivery of the employment floorspace needed to meet identified requirements in the Plan's own evidence base.

2.1.4 This approach is also inconsistent with paragraph 86 of the NPPF, which requires planning policies to:

- *"Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics"* (criterion c) – existing employment locations are suitable locations for development that will meet the needs of a modern economy;
- *"Seek to address potential barriers to investment, such as inadequate infrastructure"* (criterion d)) – existing employment areas will likely already be served by existing access arrangements and infrastructure; and
- *"Be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances"* (criterion e) – requiring new employment development in an existing employment area to apply a sequential test is not flexible.

- 2.1.5 The restrictions contained in criteria c) to e) is equally problematic. As drafted, Policy E1 provides no route for Use Class B2 and Use Class B8 development outside Key Employment Sites, city and district centres and existing employment sites, regardless of the suitability of the site or the potential economic benefits of the proposal. In practice, this means that otherwise suitable sites capable of accommodating such employment development could not come forward regardless of market demand or identified need. The policy therefore amounts to a blanket restriction on employment-generating development on non-designated land.
- 2.1.6 This approach would prevent the Plan from responding to employment needs that were not anticipated during Plan preparation and fails to recognise that different sectors have different locational requirements. It is also inconsistent with paragraph 87 of the NPPF, which requires planning policies to recognise and address the specific locational requirements of different sectors, including storage and distribution operations at a variety of scales and in suitably accessible locations.
- 2.1.7 Criterion b), and the restriction contained in criteria c) to e), should therefore be deleted and replaced with a criteria-based policy which supports employment development on non-designated land where it can be demonstrated that the proposal would not result in adverse impacts on the environment, on amenity, or on the highway network that cannot be appropriately mitigated. Such an 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. It would also provide an appropriate mechanism for supporting employment growth while ensuring that unsuitable development is not permitted. Logicor's suggested wording is set out in Section 3 of this Statement.

2.2 Question 3

2.2.1 Question 3 asks:

"Background Paper 004a (Key Employment Sites Methodology) describes how a quantitative assessment was used, along with professional judgement, to determine if sites should be designated as Key Employment Sites. As part of this process, how and why was a score of 36 points used?"

- 2.2.2 Logicor makes no comment on the specific basis for establishing the 36 point threshold. Logicor notes that the Unipart site scored exactly 36 points and that its designation rests in part on professional judgement, its former Category 1 status, its size and its redevelopment potential within the Plan period.
- 2.2.3 The site-assessment pro-forma records a "snapshot" of each site in Spring 2025 (BGP.005, paragraphs 2.14 and 2.20).
- 2.2.4 Criteria such as the age and condition of premises and vacancy therefore penalise a large, established site that is awaiting modernisation, even though that modernisation is precisely what Policies E1 and SPS17 seek. A marginal score in those circumstances is not a reliable indicator of a site's strategic value. Logicor supports the Council's use of judgement to address this and considers it essential that the threshold is not applied mechanically.

2.3 Question 4

2.3.1 Question 4 asks:

“Are the Key Employment Sites justified and was the process of designation based on appropriate available evidence?”

2.3.2 Logikor comments only on the designation of the Site as a Key Employment Site, which is justified by the evidence for the following reasons:

- **Scale and function:** The Site is one of only two large industrial sites in the city (with MINI Plant Oxford) and together they form the principal component of the south Oxford industrial area (ECON.001, paragraphs 5.64 and 5.70).
- **Market conditions:** Oxford’s industrial and warehouse market is exceptionally tight. The Employment Land Needs Assessment (‘ELNA’) (Rapleys, January 2026) records vacancy of circa 1.4% (a healthy supply is recognised as c. 5-7.5%), equating to around five months’ supply, alongside no new significant industrial or warehouse development for c. 25 years, and no identified development opportunities for such space in the city (ECON.001, paragraphs 5.82 to 5.85).
- **Irreplaceability:** The city’s industrial stock has fallen by around 25% between 2001 and the present (ECON.001, paragraph 4.37). Sites of the scale of Unipart, with established industrial access, are scarce and cannot be re-provided within Oxford’s existing settlement boundary. They must be protected.
- **Role in modernising the city’s industrial stock:** The Site is potentially the most significant opportunity in Oxford to replace dated industrial and warehouse premises with modern floorspace across a range of unit sizes, which can support a range of employment uses, including uses within the priority growth sectors identified in the UK’s Modern Industrial Strategy (2025).

2.3.3 For these reasons Logikor supports the principle of safeguarding Key Employment Sites. However, consistent with paragraphs 85 and 86 e) of the NPPF, safeguarding policies must also provide sufficient flexibility to allow sites to adapt to changing operational requirements and market conditions over the Plan period. This is particularly important in Oxford, where the supply of employment land is highly constrained and the ability of existing sites to evolve will play an important role in meeting future business needs.

2.4 Question 6

2.4.1 Question 6 asks:

“Where the redevelopment of Key Employment Sites is concerned, what is the justification for maintaining employment uses and the retaining the number of jobs in employment? How would job numbers be established and is the policy justified and effective?”

2.4.2 Logikor supports the principle that Key Employment Sites should remain in employment use. Its concerns relate to the section of Policy E1 headed ‘Loss of employment floorspace and the use of employment sites to support housing delivery’, both to those parts of it which support the release of employment sites for housing, and to criterion g), which requires that

“the number of jobs in employment generating uses is retained” where a net loss of floorspace is proposed.

- 2.4.3 That section states that planning permission will be granted for the loss of existing employment sites not designated as Key Employment Sites to other uses, including housing, and sets out the matters (criteria h) to m)) against which such proposals will be assessed. Logikor considers that this approach is not justified and is inconsistent with national policy.
- 2.4.4 The ELNA identifies the employment floorspace needs for the Plan period as a minimum requirement, and the Council has not identified sufficient land to meet them, particularly for Use Class B8 uses. Allowing residential development on existing employment sites, and Key Employment Sites, would only exacerbate that shortfall. The Plan cannot positively support the release of existing employment land for residential use where there is a net need for employment floorspace that it is not meeting.
- 2.4.5 This approach does not recognise and address the specific locational requirements of different sectors, as paragraph 87 of the NPPF requires. It does not make provision for the new, expanded or upgraded facilities needed to support those sectors, does not accommodate the growth of sectors such as freight and logistics, and does not reflect the Council's own identified need. It is therefore inconsistent with paragraphs 85 to 87 of the NPPF. All text in the Plan that supports housing on existing employment sites should therefore be removed.
- 2.4.6 Logikor supports the retention of the requirement that there should be no net loss of employment floorspace on Key Employment Sites unless the employment use can be maintained (criterion f)).
- 2.4.7 Turning to criterion g), as currently drafted the test is unclear and may not be effective when applied on a large industrial site such as Unipart, for the following three reasons:
1. The Plan does not say how existing or proposed job numbers will be established, or at what point in time the baseline should be fixed from. On a site with a mix of occupied and vacant buildings, the baseline could vary significantly, and the floorspace itself could have been vacated on a phased basis over an extended period of time where a site comprises multiple units.
 2. Policy SPS17 itself anticipates a comprehensive, phased masterplan for the Unipart Site with more green infrastructure, a 10m watercourse buffer, reduced hard landscaping and lower densities towards the south and east. A modernised and policy-compliant scheme could therefore provide less floorspace than currently exists on the Site whilst delivering a stronger and more diverse employment offer. The application of criterion g) could conflict with, and prevent the very outcome, that Policy SPS17 seeks to support, if it were applied to resist a scheme that is perceived to generate fewer jobs than the Site may be capable of accommodating at present.
 3. Modern logistics uses, and uses within the priority growth sectors identified in the UK's Modern Industrial Strategy (2025), such as Advanced Manufacturing, Digital and Technologies (including digital infrastructure), Life Sciences and Clean Energy Industries, can have lower employment densities than older premises, yet higher productivity and strategic value. These are uses that paragraph 86 c) of the NPPF asks plans to accommodate (*“laboratories, gigafactories, data centres, digital*

infrastructure, freight and logistics"). The number of jobs created by a development is not, and should not be, a policy measure of the value or success of a site's redevelopment if there is a net loss of floorspace.

- 2.4.8 Whilst employment levels are an important consideration, they should not be treated as a policy measure of a site's economic contribution. Without clarification, criterion g) risks placing disproportionate weight on job numbers and would not fully reflect the economic objectives of national policy, including the significant weight that paragraph 85 of the NPPF places on the need to support economic growth and productivity.
- 2.4.9 For these reasons, Logicator considers that criterion g) should be deleted, together with the parts of Policy E1 which support the use of existing employment sites for housing. The supporting text to Policy E1 should instead make clear that the employment function and economic contribution of a scheme for the redevelopment or intensification of a Key Employment Site will be assessed as a whole, having regard to job numbers, job quality, productivity, investment and the type of use, rather than as a strict retention of headcount. Suggested wording for the supporting text is included in Section 3 of this Statement.

2.5 Question 7

- 2.5.1 Question 7 asks:

"How does Policy E2 reflect the identified need for warehousing, storage and distribution in Oxford"

- 2.5.2 It does not do so adequately. The ELNA identifies a minimum need for 46,086 sqm of net additional B8 floorspace (ECON.001, Tables 6.5, 6.10 and 8.1) over the 20 year period from 2025 to 2045. Against commitments of 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 within the ELNA.
- 2.5.3 Policy E2 restricts the provision of new B8 floorspace to Key Employment Sites, and then only where it would *"enable the continued operation of employment generating uses at that site"* (criterion a) and/or form part of a masterplan *"on sites specifically allocated for B8"* (criterion b).
- 2.5.4 As currently drafted, criterion a) reads as if B8 is to be treated as ancillary to other employment generating uses. As currently drafted, Policy E2 is not positively prepared for a Use Class with a substantial identified, and unmet, need, and is therefore inconsistent with paragraph 87 b) of the NPPF, 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, especially where this is needed to support the supply chain, transport innovation and decarbonisation"*.
- 2.5.5 As drafted, Policy E2 reads as though Use Class B8 is a supporting function of other employment uses within a wider industrial estate. That is not the case, with freight and logistics forming the key infrastructure underpinning the UK supply chain, across local, regional and national markets. The UK's Modern Industrial Strategy (2025) recognises that the freight and logistics sector makes a vital contribution to the UK economy, and to the competitiveness of the eight growth priority sectors, by ensuring that the right goods are in the right place at the right time. In 2023, the sector contributed £79.8 billion in GVA to the

UK economy. Policy E2 understates the significance of the sector, which paragraph 86 c) of the NPPF specifically identifies as one for which plans should identify suitable locations.

- 2.5.6 Criterion b) is also unclear. It supports B8 uses brought forward “*as part of a wider agreed masterplan on sites specifically for B8*”. However, the Plan does not allocate any site specifically for B8 development. Key Employment Sites, including the Site, are designated to support a range of employment uses, rather than allocated for a specific use class or quantum of floorspace. Policy SPS17 for example, supports industrial (Class B2), storage and distribution (Class B8) and research and industrial process (Class E) uses. Criterion b) therefore cannot be met on any site, even where a wider masterplan is agreed. B8 proposals must instead rely on criterion a), which only supports B8 where it enables the continued operation of other employment uses. As a result, Policy E2 provides no route for B8-led development on a Key Employment Site, even where the relevant site specific policy supports B8 uses.
- 2.5.7 Given Oxford’s exceptionally constrained industrial market, including very limited availability and a longstanding lack of new industrial development, Logikor considers that the evidence does not justify the restrictive approach of Policy E2, and the policy does not explain how the identified need will be met. Further clarification and amendment would improve the effectiveness of Policy E2 and provide greater certainty as to how identified B8 needs are intended to be met.
- 2.5.8 It is need and market signals that will drive the location of storage and distribution development. The Plan should be flexible enough to support such floorspace coming forward at a variety of scales and in suitably accessible locations (NPPF, paragraphs 86 e) and 87 b)).
- 2.5.9 Logikor also questions whether a separate Policy E2 is necessary at all. Where the Council has an identified need which the Plan is not currently meeting, there should be no specific restriction on the development of B8 uses, subject to demonstrating that there would be no unacceptable impact on amenity, highways or the environment. B8 proposals could instead be assessed against Policy E1, modified as Logikor proposes, which would support employment development on both designated and non-designated land.
- 2.5.10 If Policy E2 is retained, a new criterion c) should be introduced, as set out in Section 3 of this Statement, which supports storage and distribution floorspace where a need is demonstrated, whether identified in the evidence base or through market signals. The opening text of Policy E2 should also be amended so that, in accordance with Policy E1 as modified, B8 development is supported on Key Employment Sites, on existing employment sites and 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.

2.6 Question 8

- 2.6.1 Question 8 asks:

“How much additional floorspace for warehousing, storage and distribution is proposed? How does this relate to need?”

- 2.6.2 Logikor does not dispute the identified need. Its concern is how and where that need will be met. Beyond existing commitments of 123 sqm, the Plan does not quantify how or where the additional B8 floorspace is proposed to be accommodated. The ELNA concludes that

the need can be “*absorbed within Oxford’s existing employment portfolio*”, but no sites, capacities or trajectory are identified to support that conclusion. Given the market evidence summarised in response to Question 4, the Plan should be clearer about how the need is expected to be met.

- 2.6.3 In Logikor’s view, the appropriate mechanism is a flexible policy framework which positively supports B8 and related employment uses across the network of Key Employment Sites, on existing employment land and, where a need is demonstrated and there would be no adverse environmental or amenity impacts, on non-designated land. Whilst the modernisation and intensification of existing employment land may support its continued economic function and improve the quality and efficiency of existing provision, the Plan provides no evidence that this will generate sufficient additional capacity to meet the identified need for B8 floorspace. Given the absence of any identified sites, capacities or delivery trajectory, it is unclear how the identified need will be accommodated through the existing portfolio of employment land alone. The Plan should therefore provide greater flexibility for B8 development to come forward on existing employment land and on other suitable sites where opportunities arise over the Plan period.
- 2.6.4 As the identified need in the ELNA is a minimum, the Plan should also make clear that it is not a ceiling on provision, and that B8 proposals can respond to need demonstrated through market signals over the Plan period. Logikor’s suggested modifications to Policy E2 and its supporting text are set out in Section 3 of this Statement.

3 Modifications Sought

- 3.1 To make the Plan sound, Logikor invites the Inspectors to consider the following modifications, which are set out in Table 3.1.

Table 3.1: Modifications Sought

No.	Modification Sought
1	Policy E1 (Employment Strategy), ‘New Employment Generating Uses’, Criteria b) to e) Delete: <i>“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.</i> <i>Planning permission will not be granted for proposals for employment generating uses outside the following locations:</i> <i>c) Key Employment Sites;</i> <i>d) the city and district centres;</i> <i>e) existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class).”</i> Replace with the following new part of Policy E1: “Employment development on non-designated land Planning permission will be granted for employment generating uses on land which is not designated as a Key Employment Site and is not an existing employment site, where it can be demonstrated that the development would not result in an adverse impact on the environment, on amenity (including residential amenity) or on the highway network that cannot be appropriately mitigated.” Reason: Criteria b) to e) are unnecessarily restrictive for a Plan which has not identified sufficient land to meet its minimum employment needs. The sequential test at criterion b) is not an appropriate mechanism for directing industrial, storage and distribution uses, which are not main town centre uses, and Policy E1 provides no route for employment development on non-designated land. The approach is inconsistent with paragraphs 86 c) to e) and 87 of the NPPF. The new part would provide a criteria-based route for meeting need, consistent with paragraph 86 b) of the NPPF, and would ensure the Plan is flexible enough to accommodate needs not anticipated in the Plan.

2	Policy E1 (Employment Strategy), ‘Loss of Employment Floorspace and the Use of Employment Sites to Support Housing Delivery’, and Supporting Text Delete criterion g), the text supporting the loss of existing employment sites not designated as Key Employment Sites to other uses including housing, and criteria h) to m), together with all other text in the Plan which supports the use of existing employment sites for housing. Retain the requirement that there should be no net loss of employment floorspace on Key Employment Sites unless the employment use can be maintained (criterion f)). Add supporting text: “Proposals for the redevelopment, modernisation or intensification of Key Employment Sites, including phased redevelopment, will be assessed on the scheme as a whole, and on whether the employment function and economic contribution of the site is maintained or enhanced, taking account of factors including job numbers, job quality, productivity, investment and the nature of the employment uses proposed. Intensification will not be measured by net additional floorspace or job numbers alone.” Reason: The Plan has not identified sufficient land to meet the minimum employment needs identified in the ELNA. Supporting the release of existing employment sites to housing would exacerbate that shortfall and is inconsistent with paragraphs 85 to 87 of the NPPF. Criterion g) would place disproportionate weight on job numbers. The supporting text would ensure that the redevelopment and intensification of Key Employment Sites are assessed on their overall economic contribution rather than employee numbers alone.
3	Policy E2 (Warehousing, Storage and Distribution), Opening Text and Criteria a) to c) Logicator questions whether Policy E2 is necessary, and considers that B8 proposals could be assessed against Policy E1 as modified (Modification 1). If Policy E2 is retained, it should be modified as follows. Replace: <i>“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:</i> <i>a) Enable the continued operation of employment generating uses at that site; and/or</i> <i>b) Be brought forward as part of a wider agreed masterplan on sites specifically allocated for B8; and</i>

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”.

with:

“Planning permission will be granted for new or expanded warehousing, storage and distribution uses on Key Employment Sites and, in accordance with Policy E1, on other sites, where they:

a) Enable the continued operation of employment generating uses at that site; or

b) Accord with a site-specific policy for a Key Employment Site that supports B8 uses as part of a mix of employment uses; or

c) Meet a need for storage and distribution floorspace, whether identified in the evidence base supporting the Plan or demonstrated through market signals such as vacancy, take-up and occupier demand, without prejudicing the operation of existing employment uses on the site; and

d) 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.”

Reason: No site in the Plan is specifically allocated for B8. Key Employment Sites are designated for a mix of employment uses, so criterion b) as drafted cannot be met, and B8-led development must rely on criterion a). The ELNA identifies a minimum need for 46,086 sqm of net additional storage and distribution floorspace. The amendment would provide a positive and effective framework for accommodating that need on Key Employment Sites and other suitable sites, consistent with site specific policies and paragraph 87 b) of the NPPF. Criterion c) should not limit provision to the quantum identified in the ELNA, which is a minimum, and should allow needs arising over the Plan period to be met, consistent with paragraph 86 e) of the NPPF.

4 Supporting Text to Policy E2 (Warehousing, Storage and Distribution)

Add supporting text:

“The need for storage and distribution floorspace identified in the Employment Land Needs Assessment is a minimum and does not represent a ceiling on provision over the Plan period. This need is expected to be met through the modernisation and intensification of employment land across the Key Employment Sites, which are designated to protect and support employment use rather than to deliver site-specific floorspace requirements, and through employment development on other suitable sites where a need is demonstrated, in accordance with Policy E1. This may include existing employment locations and other suitable sites, including non-designated land, at a variety of scales and in suitably accessible locations. The Council will monitor the delivery of

employment floorspace, including storage and distribution uses, to ensure that identified needs continue to be capable of being accommodated throughout the Plan period.”

Reason: This would improve the effectiveness of the policy and provide greater certainty regarding delivery, while confirming that the need is a minimum and will be met flexibly across the Key Employment Sites, existing employment areas and other suitable sites.

4 Participation in Hearings

- 4.1 Logikor has requested to participate in the Stage 1 hearings, and the Programme Officer has acknowledged receipt of that request. Logikor wishes to participate in the following session:
- Thursday 22 October 2026 (afternoon) – Matter 3, Issue 4 (Employment Strategy – Policies E1 and E2), to assist the Inspectors on the modifications sought.
- 4.2 Logikor has prepared and submitted a separate Written Statement in respect of Matter 2 (Housing and Employment Needs), Issue 6, Question 4 (how the needs for storage and distribution uses will be met over the Plan period), a copy of which is appended to this Statement at Appendix 1. Noting the matters are more appropriately discussed at Matter 3, Logikor does not seek to participate in the Matter 2 hearing session but trusts the Written Statement submitted will be considered appropriately.
- 4.3 Should Logikor not be invited to participate in that session, this Statement should be treated as a Written Statement in accordance with paragraph 28 of the Examination Guidance Note (ID.005).

Appendix 1: Matter 2 Written Statement – ‘Housing and Employment Needs’



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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