Examination of the Oxford Local Plan 2045 – MIQ for Stage 2

Matter 5 Hearing Statement – 'Site Allocations'

10 November 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 Logicor Cowley Investments Limited ('Logicor') (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 Logicor 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 to be developed on sites.

1.5 This Statement should be read in conjunction with the Regulation 19 representations submitted on behalf of Logicor by tor&co, dated 11 March 2026.

1.6 Table 1.1 details the questions this Hearing Statement responds to.

Table 1.1: Questions Responded To

No.	Question
Issue 2: SPS17 – Unipart Site	
1	What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?
2	How are proposals expected to "*respond to the allocation of the land at Northfield on the southern edge of the site…*"? Is it sufficiently clear to users of the plan what is required of development proposals for the Unipart site?

1.7 In summary, Logicor's position is that:

- Logicor supports Policy SPS17 and the continued protection of the Site as a Key Employment Site, including the Policy's support for new development, modernisation and intensification, and the flexible approach to land uses.

- Logicor supports the intent of the Policy's greening, landscape, biodiversity and movement criteria. However, this should be applied having regard to the operational and security requirements of future employment occupiers, and considered holistically across the Site, so that it does not cumulatively constrain the Site's contribution to meeting the Council's identified employment needs.

- Logicor consider that criterion (k) is not justified, is insufficiently clear to be effective, and is inconsistent with the agent of change principle at paragraph 200 of the NPPF. This criterion must therefore be deleted from Policy SPS17.

2 Response to the Inspectors' Questions within Matter 5, Issue 2 (SPS17 – Unipart Site)

2.1 Question 1

2.1.1 Question 1 asks:

> *"What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?".*

2.1.2 The Site is in active employment use, including warehousing, industrial, open storage, office and other ancillary uses. The existing buildings, external yard areas and hardstanding largely reflect the operational requirements of the period in which it was originally developed.

2.1.3 Logicor is actively exploring the comprehensive redevelopment of the Site to deliver modern employment floorspace, which would include Use Classes B2 and B8 as well as Use Classes E(g)(ii) and E(g)(iii), and is in early pre-application discussions with Oxford City Council to inform the preparation of its redevelopment strategy.

2.1.4 The Site is identified as a Key Employment Site and forms an important component of the Plan's Employment Strategy. Logicor supports the principle of Policy SPS17, which promotes the development, modernisation and intensification of employment uses on the Site, providing a clear policy framework to support its redevelopment during the plan period.

2.1.5 The Site is deliverable within the plan period and evidence of deliverability includes Logicor's active promotion of the Site, ongoing engagement with the Council, and the existence of a site-specific policy framework that supports redevelopment and intensification for employment purpose.

2.1.6 As the landowner, Logicor supports the overall direction of Policy SPS17 and considers that it provides an appropriate framework for the future redevelopment of the Site. However, a number of points would benefit from further clarification to ensure that the Policy can be implemented effectively, including:

- **Criterion (c)** – yard areas, service zones and HGV circulation are fundamental components of industrial and logistics developments. Whilst opportunities to reduce hard landscaping will be explored, the extent to which this can be achieved on Site will be informed by market requirements and the need to deliver flexible and future-proofed development.

- **Criterion (d)** – Logicor notes the requirement for a 10-metre undeveloped buffer to the watercourse (Hollow Brook) on the eastern boundary. The objective of improving access and connectivity is supported, however future occupiers may have site-specific operational and security requirements that necessitate alternative boundary treatments or controlled access arrangements. The Policy should therefore allow sufficient flexibility for such matters to be considered at application stage.

- **Criterion (f)** – the Policy identifies land along the railway line and a north-south strip across part of the Site as having potential to become important for biodiversity but provides limited explanation of the nature of that potential or the measures envisaged. Further clarification within the supporting text is encouraged, including details of how the Local Nature Recovery Strategy should be considered when preparing proposals.

2.2 Question 2

2.2.1 Question 2 asks:

> *"How are proposals expected to "respond to the allocation of the land at Northfield on the southern edge of the site…"? Is it sufficiently clear to user of the Plan what is required of development proposals for the Unipart site?".*

2.2.2 Criterion (k) requires the design of new development to respond to the allocation of land at Northfield on the southern edge of the Site (within South Oxfordshire) and any proposals that may come forward there, providing walking, cycling and wheeling links to future transport infrastructure.

2.2.3 The land at Northfield referenced in Policy SPS17 is allocated under Policy STRAT12 of the adopted South Oxfordshire Local Plan 2035. Whilst the allocation has been subject to an Environmental Impact Assessment scoping request (reference P21/S3647/SCO) in August 2021 for a residential-led mixed use development of up to 1,800 dwellings, a primary school and a local centre, no planning application has yet been submitted and the final form, layout, access arrangements and timing of development remain unknown.

2.2.4 That notwithstanding, it is not clear to users of the Plan what criterion (k) requires in practice. The criterion requires development proposals on the Site to respond to future proposals that do not yet exist and whose form, layout, access arrangements and timing are unknown. As drafted, criterion (k) is neither sufficiently precise nor capable of consistent application through the development management process. Its effectiveness is also dependent upon the future progression of a separate allocation outside the Plan area, over which applicants for development at the Site have no control. Logicor therefore considers that criterion (k) is not clearly written or unambiguous, contrary to paragraph 16(d) of the NPPF.

2.2.5 Most importantly, criterion (k) is inconsistent with the agent of change principle. The Site is an established and operational employment location and any future development at Northfield would come forward adjacent to any existing or future uses. Paragraph 200 of the NPPF is clear that existing businesses should not have unreasonable restrictions placed upon them as a result of development permitted after they were established and that responsibility for mitigating potential impacts should rest with the incoming development. In this context, it is for any future development at Northfield to respond appropriately to the Site and its operational requirements, rather than for redevelopment of the Site to respond to unknown future proposals at Northfield.

2.2.6 This concern is reinforced by the indicative concept plan accompanying Policy STRAT12 of the adopted South Oxfordshire Local Plan 2035, which illustrates higher-density residential development in close proximity to the Site. While Logicor recognises that the South Oxfordshire allocation is not a matter for this Examination, the concept plan demonstrates the importance of applying the agent of change principle correctly. Policy SPS17 must not

require an established employment site to accommodate or respond to future residential development that may come forward nearby.

2.2.7 We would also highlight that the stated objective of securing pedestrian, cycling and wheeling connections to surrounding development, including across the administrative boundary with South Oxfordshire, is already addressed by criterion (n). Criterion (k) therefore adds no additional policy requirement and risks creating uncertainty regarding the relationship between future development at Northfield and the Site. Logicor therefore considers that criterion (k) should be deleted.

3 Modifications Sought

3.1 To make the Plan sound, Logicor invites the Inspectors to consider the following modifications set out in Table 4.1.

Table 4.1: Modifications Sought

No.	Modification Sought
Policy SPS17 – Unipart Site	
M1	Add at the start of the 'Open space, nature, flood risk' section: "*The requirements of criteria (a) to (f) will be applied having regard to the safety and security requirements of future employment occupiers and their anticipated operational requirements, as well as the need to ensure flexible and efficient use of the Site for employment development. The application of criteria (a) to (f) will be considered across the Site as a whole*."
M2	Amend the second sentence of criterion (d) as follows: "*Where compatible with the operational and security requirements of occupiers, 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*."
M3	Delete criterion (k).

4 Participation in Hearings

4.1 Logicor has requested to participate in the Stage 2 hearings, and the Programme Officer has acknowledged receipt of that request. Logicor wishes to participate in the following session:

- **Thursday 26 November 2026** (afternoon) – Matter 5, Site Allocations – Issue 2 (Policy SPS17 – Unipart Site) to assist the Inspectors on the modifications sought.

4.2 Should Logicor not be invited to participate in that session, this Statement should be treated as a Written Statement in accordance with the Examination Guidance Note for Stage 2.

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