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

Matter 8 Hearing Statement – 'Employment and Economic Development'

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 currently unmet need.

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. Logicor's Regulation 19 representations objected to Policy E3 (Community Employment and Procurement Plans) and Policy E4 (Affordable Workspaces) as unsound (not justified) (references 117.3 and 117.4), including on the basis that Policy E4 lacks clarity as to how its requirements would apply to manufacturing, research and logistics units on sites such as Unipart.

1.6 This Statement should also be read in conjunction with Logicor's Stage 1 Hearing Statement in respect of Matter 3 (Issue 4: Employment Strategy) and its Written Statement in respect of Matter 2 ('Housing and Employment Needs'), both submitted in October 2026. Those statements set out Logicor's position on the role of the Site as a Key Employment Site, the protection of existing employment land, and the need for Policies E1 and E2 to provide flexibility for a range of employment uses, including Use Class B8, to come forward. The matters raised in this Statement on Policies E3 and E4 are made in that context – that the Site's contribution to meeting the city's employment needs depends on the policy framework enabling, rather than deterring, its modernisation and intensification.

1.7 In accordance with the Inspectors' Stage 2 Guidance Note, this Statement responds only to those questions under Matter 8 'Employment and Economic Development', Issue 1 (Community Employment and Procurement – Policy E3) and Issue 2 (Affordable Workspaces – Policy E4) that relate directly to Logicor's Regulation 19 representations, together with the following questions set out in Table 1.1:

Table 1.1: Summary of Questions Responded To

No.	Question
Issue 1 – Community Employment and Procurement (Policy E3)	
1	Is Policy E3 justified and consistent with national planning policy? In particular, are issues such as whether contractors commit to paying the 'Oxford Living Wage' justified land use planning considerations for the purposes of the Local Plan? How would it be enforceable and is the policy effective?
Issue 2 – Affordable Workspaces (Policy E4)	
1	What are the list of sites in Policy E4 based on, and what evidence is there to justify the threshold of 5,000 square metres?
2	What is the justification for requiring an 'affordable workspace strategy' and is it supported by the viability evidence which underpins the Plan?
3	Precisely what is required of applicants to meet the requirements of Policy E4 and how will it be enforced? Is the policy effective?

1.8 In summary, Logicor's position is that:

- In respect of Policy E3, Logicor supports the objective of securing training, apprenticeship and local employment opportunities from new development. However, it considers that the policy is not justified or effective as drafted. Policy E3 turns the Council's current approach of encouraging Employment and Skills Plans (at paragraphs 2.17 and 2.18 of the Oxford Local Plan 2036 into a mandatory requirement, without new evidence to support that change. Criteria f) and g), which relate to the Oxford Living Wage, are not land use planning matters and would not pass the Community Infrastructure Levy ('CIL') Regulation 122 test of being necessary to make the development acceptable in planning terms. Criterion i) would extend affordable workspace requirements to all qualifying development across the city. Employment and Skills Plans should be encouraged or, if they are required, the requirement should be proportionate and, where end users are not known, focused on the construction phase.

- In respect of Policy E4, Logicor supports the principle of affordable workspace provision, but considers that the policy, as drafted, is not justified or effective as it applies to the Site. The Council's evidence (BGP.007) identifies a market failure in the office and R&D market, not in the industrial and logistics market. The policy also makes no allowance for the operational characteristics of Use Class B2 and B8 floorspace and does not set out what is required of applicants. Policy E4 should apply to the net gain in floorspace only, measured against existing lawful floorspace, and should allow for off-site provision or a financial contribution in lieu where on-site provision is not practicable, and the key parameters of the requirement should be set out in the Plan.

2 Response to the Inspectors' Questions within Matter 8, Issue 1

2.1 Question 1

2.1.1 Question 1 asks:

> *"Is Policy E3 justified and consistent with national planning policy?*
>
> *In particular, are issues such as whether contractors commit to paying the 'Oxford Living Wage' justified land use planning considerations for the purposes of the Local Plan?*
>
> *How would it be enforceable and is the policy effective?*

2.1.2 Logicor supports the objective of Policy E3. It recognises the evidence set out in the Council's Employment and Inclusive Economy Background Paper (BGP.001d) of persistent educational and skills deprivation in parts of the city (paragraphs 3.20 to 3.22 and 5.42), and the role that new development can play in providing training, apprenticeships and local employment, particularly during the construction phase.

2.1.3 Logicor's Regulation 19 representations (reference 117.3) supported the increase in the non-residential threshold but objected to Community Employment and Procurement Plans ('CEPPs') being a mandatory policy requirement. They sought instead that such plans be encouraged, consistent with the Council's 'Alternative Option 1'. The wording of Policy E3 has not changed since the Regulation 19 consultation.

2.1.4 The adopted Oxford Local Plan 2036 already provides that applicants are encouraged to submit an Employment and Skills Plan ('ESP') alongside all major development proposals, and that ESPs should be employer-led, with their detail varying according to the size and type of development (paragraphs 2.17 and 2.18). The Council's Employment and Skills Technical Advice Note 2 (May 2021) (ECON.012) sets out how ESPs should be prepared. It advises that they be proportionate to the development, refers to the Construction Industry Training Board ('CITB') benchmarks as a guide to proportionate outputs, provides for ESPs to be secured by planning condition, and presents commitment to the Oxford Living Wage as an option rather than a requirement.

2.1.5 BGP.001d states that requiring CEPPs would "*solidify the extant approach*" (paragraph 5.43). Policy E3 goes considerably further than that by:

- Making a CEPP a prerequisite of planning permission ("*Planning permission will only be granted…*"), rather than encouraging one;
- Requiring every CEPP to demonstrate consideration of all nine measures listed, irrespective of the scale, nature or end use of the development;
- Introducing procurement, pay and affordable workspace measures that go beyond employment and skills; and

- Providing for the commitments to be secured by legal agreement, rather than by planning condition.

2.1.6 BGP.001d provides no evidence to justify that change. It does not report the outcomes of the ESPs secured under the Oxford Local Plan 2036 or explain why the current approach of encouragement has not been effective. Nor has the cost of a CEPP been tested. The viability evidence referred to in BGP.001d (paragraphs 5.66 to 5.70) relates to the financial implications of delivering affordable workspace only, which is dealt with under Policy E4, not to Policy E3.

2.1.7 It is noted that the NPPF contains no specific policy on employment and skills plans. Paragraphs 85 and 86 support a strong, competitive economy, and measures relating to construction training, apprenticeships and local recruitment are capable of being relevant to planning. However, any condition must meet the tests at paragraph 57 of the NPPF (and CIL Reg 122) and any planning obligation must meet the tests at paragraph 58.

2.1.8 The established national benchmark is the CITB National Skills Academy for Construction 'Client Based Approach', which sets employment and skills outputs in proportion to the value of the construction project. It is already referred to in the Council's own Employment & Skills Technical Advice Note 2 and is used by other authorities. Policy E3 makes no reference to it and contains no mechanism to ensure that what is sought is proportionate to the development.

2.1.9 Criteria f) and g) relate to the rates of pay of the employees of the developer, of future occupiers and of contractors. Logicor does not consider that these are land use planning considerations, for the following reasons:

- Rates of pay are regulated nationally through national minimum wage legislation, including the National Living Wage. It does not relate to the use or development of land.

- Payment of a particular wage is not necessary to make a development acceptable in planning terms, nor is it directly related to the development (NPPF, paragraph 58 a) and b)). For the same reasons, a condition requiring it would not be relevant to planning or to the development permitted (NPPF, paragraph 57).

- The requirement could not be enforced.

2.1.10 The Council's own Technical Advice Note 2 presents the Oxford Living Wage as an option. Comparable local plans elsewhere take the same approach. For example, the London Plan (March 2021) addresses low pay through the Mayor working with strategic partners (Policy E11 – Skills and opportunities for all).

2.1.11 Logicor supports the Council's wider objective of promoting fair pay. That objective can be pursued through the Council's own procurement and its partnership work to promote an inclusive economy (referred to in the supporting text to Policy E3), rather than through the planning system. We consider that criteria f) and g) should therefore be deleted. If any reference to the Oxford Living Wage is retained, it should be in the supporting text, as encouragement, and not included within the policy wording.

2.1.12 As drafted, Policy E3 is not effective, for the following reasons:

- **Clarity**: CEPPs are required only to "*demonstrate consideration of*" the listed measures, yet the policy states that the Council will use a legal agreement to "*secure these commitments*". It is unclear whether a measure that has been considered becomes a binding commitment, so applicants cannot identify what is required of them (NPPF, paragraph 16 d)).

- **Speculative industrial and logistics development**: Where units are built speculatively, as is typical for industrial and logistics development, the end user is not always known at planning application stage. A developer cannot commit to operational-phase jobs, supply chain procurement or the pay of future occupiers' employees (criteria d), e) and f) of Policy E3). Where the end user is not known, the requirement should be limited to the construction phase.

- **Proportionality**: The same 5,000 sqm threshold and the same nine measures apply to all non-residential development, whatever its scale, construction value or employment density. The outputs sought should instead be proportionate to the development, by reference to the CITB benchmarks, which is the approach that the Council currently take as per the Technical Advice Note 2.

- **Affordable workspace (criterion i))**: Policy E3 applies to all non-residential development of 5,000 sqm or more across the city. Criterion i) would therefore extend an affordable workspace requirement to every qualifying scheme, not only the ten sites listed in Policy E4 and assessed in BGP.007. That is not supported by the evidence and would duplicate Policy E4 (which we would also highlight applies only to a "*net gain*" of 5,000 sqm of floorspace). We consider that criterion i) should be deleted. Alternatively, the Plan should make it clear that any provision made in accordance with Policy E4 agreed with the Council satisfied criterion i) of Policy E3.

- **Securing mechanism**: The Council's current practice is to secure ESPs by planning condition (Technical Advice Note 2), which we consider remains to be the proportionate approach.

2.1.13 As with Policy E4 (discussed further below under Section 3), the supporting text defers detail to a Technical Advice Note, which has not yet been produced and will not form part of the statutory Development Plan. Although further guidance would be welcomed, we would stress that the key requirements of the policy must be set out in the Plan itself and not deferred to a later date.

2.1.14 Logicor's suggested modifications to Policy E3 are set out in Section 4 of this Statement.

3 Response to the Inspectors' Questions within Matter 8, Issue 2

3.1 Question 1

3.1.1 Question 1 asks:

> *"What are the list of sites in Policy E4 based on, and what evidence is there to justify the threshold of 5,000 square metres?".*

3.1.2 Logicor supports the principle of Policy E4 and recognises the evidence set out in the Council's Affordable Workspaces Background Paper (June 2026, Examination Library Reference BGP.007) of a need for smaller, lower-cost workspace for start-up, SME and social enterprise occupiers in Oxford. Logicor's concern, as raised in its Regulation 19 representations (reference 117.4), is that the evidence does not justify the inclusion of the Unipart Site in the list of sites at criterion g), nor the application of a 5,000 sqm threshold irrespective of the Use Class proposed. We note that the wording of Policy E4 has not changed since the Regulation 19 consultation.

3.1.3 In respect of the sites listed in Policy E4, BGP.007 suggests that they're all capable of delivering larger schemes involving employment generating uses (paragraph 5.1), and acknowledges that the majority of them are focused on office/R&D uses rather than industrial and warehousing uses (paragraph 5.3). The rationale given for looking to these sites to provide affordable workspace, including the Unipart site, is the "*logic*" identified in the Oxford City – Employment Land Needs Assessment (January 2026) (ECON.001), prepared by Rapleys on behalf of the Council, of R&D uses contributing to an affordable workspace offer, because of the large difference between R&D values and those of general industrial and secondary office floorspace, and because R&D uses are displacing those lower value uses (paragraph 5.4).

3.1.4 Logicor considers that the requirement for affordable workspace should not be applied to Industrial and logistics (I&L) development in Use Classes B2 (general industrial) and B8 (storage and distribution). Alongside Use Classes B2 and B8, any application for the redevelopment of the Site would also seek permission for Use Classes E(g)(ii) and E(g)(iii), to provide flexibility for a range of industrial occupiers. BGP.007 identifies market failure in the R&D and office market, arising from the strength of the R&D market, which is redeveloping secondary office and older industrial premises and displacing lower-value occupiers (BGP.007, paragraphs 2.34, 2.44 and 5.4). The evidence in BGP.007 and the ELNA shows compelling reasons to require office and R&D development to provide affordable workspace, including:

- Prime office rents in Oxford have risen from £27 to £30 per sq ft in 2016 to £61 per sq ft in 2024, with R&D/lab rents recorded at £78.50 per sq ft in 2024 (paragraph 2.5);
- There is exceptionally high demand due to the presence of two world-class universities and a number of research hospitals, and a lack of quality office stock;
- There is a constrained supply, with a significant historic decline in office floorspace due to residential permitted development rights. Looking forward, R&D is expected to out-compete office development in Oxford.

3.1.5 In contrast, the evidence shows that the I&L market in Oxford has remained fairly static over the past five years. Rents have increased from circa £10 per sq ft to £13 per sq ft over the same period as above between 2016 and 2024 (BGP.007 Figure 2.3), which tracks against the Consumer Price Index and does not indicate market failure.

3.1.6 BGP.007 notes that "*the profile of the existing stock is not always the type of space typically sought by modern occupiers. However, due to the lack of credible alternatives, it remains well-occupied, with low reported vacancy rates*", meaning occupiers indeed require higher quality space, but again does not indicate a market failure.

3.1.7 BGP.007 also notes that "*should new stock become available, average rents are likely to increase over time*", indirectly implying that there would be a future need for affordable workspace. However, where new, high-quality stock becomes available, for example where existing I&L sites are modernised, intensified and redeveloped, and additional floorspace is delivered, it will be taken up by those occupiers requiring better-quality space (as confirmed in BGP.007 para 2.21). Those occupiers will in turn release the lower quality, and lower cost stock that they currently occupy to the market, and the increase in overall supply can relieve pressure on rents at the lower end of the market – making it even more affordable. Whilst the average rent may increase, from a very low baseline, the lower end of the market would remain available to those occupiers who need it.

3.1.8 Finally, paragraph 2.36 in BGP.007 notes that "*the industrial/ warehousing market is under pressure, most notably at Osney Mead, where there is an ambition to convert the existing industrial estate into an innovation district*" (paragraph 2.36). This is the only example given, both in BGP.007 and the Employment Land Needs Assessment (ECON.001). The scale of any displacement at Osney Mead is also likely to be overstated. As the ELNA records (paragraphs 5.68 and 5.69), a significant proportion of the estate is already occupied by non-industrial uses (some of which have been established for over a decade), including lab space, life sciences, engineering, conference and community uses, so redevelopment would not displace industrial occupiers across the whole estate. In any event, potential displacement arising from the redevelopment of one site provides no justification for requiring affordable workspace from I&L development elsewhere in the city, which would neither cause that displacement nor be directly related to it.

3.1.9 The policy looks to R&D-led sites to address that failure because they generate the value uplift that drives it (paragraph 5.4). The redevelopment of the Site for industrial and logistics uses does not. It would add modern floorspace to a market which has seen no new development for around 25 years (paragraphs 2.9 and 2.32), and which BGP.007 expects to tighten further as industrial land at Osney Mead is redeveloped (paragraphs 2.36 and 2.44). The Site therefore forms part of the response to the pressure on lower-cost employment space, rather than a cause of it. The Site's inclusion in the list is not explained or justified by the Council's own evidence.

3.1.10 Logicor considers that affordable workspace requirements should apply only where they are justified by robust evidence, which should demonstrate:

- The unmet need by use and location;
- The existing supply of lower-cost space;
- A clear link between the development on which the requirement is placed and the identified need; and

- Evidence of take-up.

3.1.11 This is consistent with the approach of the adopted London Plan (2021), Policy E3 of which is circumstances based. Policy E3 states that planning obligations may be used to secure affordable workspace "*in defined circumstances*" (Part A); consideration is to be given to the need for it in particular locations, including "*areas identified in a Local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace*" (Part B 2)); and boroughs are to consider detailed policies "*in light of local evidence of need and viability*" (Part C). The London Plan therefore ties affordable workspace requirements to evidence of the specific pressure that the policy is intended to address. BGP.007 does not provide that evidence for industrial and logistics floorspace, or for the Site.

3.1.12 The Draft London Plan (July 2026), although not yet adopted, maintains that evidence-led approach. Draft Policy GLE7 (Affordable workspace), which would replace Policy E3, extends the scope of affordable workspace policies to data centres and Use Class B8 development, but only "*where justified by strategic and local evidence of need and an assessment of viability*" (Part A). Neither the adopted nor the emerging London Plan therefore supports an affordable workspace requirement on industrial and logistics development in the absence of evidence of need specific to that use and location.

3.1.13 In respect of the 5,000 sqm threshold, we note that the Local Plan 2045 Viability Study (BNP Paribas, December 2025) (SUP.002) tested two approaches, including the provision of 10% of floorspace and the provision of 1,000 sqm, each at rent discounts of 25%, 50% and 100% (BGP.007, paragraphs 4.3 and 4.4). For industrial and warehousing uses, BGP.007 states that the results of the Study "*varied widely between the typologies tested*" (paragraph 4.6) and that only typologies of 5,000 sqm or more were "*better able*" to accommodate the tested amounts of affordable workspace than smaller typologies (paragraph 4.7). That is not evidence that industrial and logistics schemes of that size can viably do so. In industrial and logistics terms, a net gain of 5,000 sqm equates to a single mid-sized unit, so the threshold would be engaged by almost any development on the Site. The evidence does not justify applying the same threshold to Use Class B2 and B8 development, or to the flexible industrial floorspace across Use Classes B2, B8, E(g)(ii) and E(g)(iii) that would be applied for at the Site, as to office/R&D development.

3.1.14 BGP.007 also identifies the need for affordable workspace as a city-wide issue, arising from the strength of the R&D market across the city (BGP.007, paragraphs 2.43 to 2.45). If the need is city-wide, the Plan should allow it to be met in the locations best placed to meet it, rather than confining delivery to the sites that generate the requirement. This supports the provision of an off-site or financial contribution mechanism, as set out in further detail in response to Question 2.

3.2 Question 2

3.2.1 Question 2 asks:

> *"What is the justification for requiring an 'affordable workspace strategy' and is it supported by the viability evidence which underpins the Plan?".*

3.2.2 Logicor does not object in principle to the preparation of Affordable Workspace Strategies as a means of setting out how a development can contribute to the city's workspace offer. However, the justification for the requirement is drawn from the office and R&D market (see

response to Question 1), and neither Policy E4 nor its supporting text distinguishes between Use Classes.

3.2.3 Industrial, logistics and other specialist employment uses, including digital infrastructure, are typically designed for a single occupier, with shared yards, loading, security, servicing and power arrangements. Part of a unit cannot easily be separated and let on different terms to a different occupier. In practice, affordable workspace on an industrial site would need to take the form of a standalone unit with its own access and servicing arrangements.

3.2.4 BGP.007 identifies 1,000 sqm as generally the minimum floorspace required to operate a sustainable affordable workspace business model (paragraph 4.4). For a 5,000 sqm industrial or logistics scheme, that would equate to 20% of the floorspace, which is double the 10% tested in the Local Plan 2045 Viability Study. Given that the results for industrial and warehousing typologies "*varied widely*" (paragraph 4.6), the viability evidence does not demonstrate that on-site provision can be supported by industrial and logistics development at the threshold proposed.

3.2.5 Additionally, neither the Viability Study nor BGP.007 tests or considers off-site provision or a financial contribution in lieu. The supporting text to Policy E4 states that affordable workspaces "*should be delivered on-site*". That requirement does not appear in the policy itself, and this approach is not justified. It is also inconsistent with established practice in respect of affordable workspace provision in other plan making areas, where off-site provision or a payment in lieu is commonly provided for, including:

- **The London Plan (March 2021)**: Policy E3 (Affordable workspace) does not require affordable workspace to be delivered on-site. It provides that planning obligations "*may be used*" to secure affordable workspace "*in defined circumstances*" (Part A), and that boroughs should consider detailed affordable workspace policies "*in light of local evidence of need and viability*" (Part C). Paragraph 6.3.2 confirms that affordable workspace can be provided and/or managed through a range of arrangements, including directly by a dedicated workspace provider, a public, private, charitable or other supporting body, or through grant and management arrangements.

- **Lambeth Local Plan 2020 to 2035 (adopted September 2021)**: Policy ED2 (Affordable workspace) allows a payment in lieu in exceptional circumstances where it is demonstrated that on-site provision is not feasible and/or that a greater economic impact would be achieved, with payments to be used by the Council to support the provision of affordable workspace anywhere in the borough.

- **Southwark Plan 2019 to 2036 (adopted February 2022)**: Policy P31 (Affordable workspace) requires affordable workspace on-site, but allows a payment in lieu towards off-site provision where on-site delivery is not feasible.

3.2.6 Although not yet adopted, the Draft London Plan (2026) Policy GLE7 goes further. It provides that affordable workspace "*can be provided on-site, or in an off-site location*", particularly where on-site delivery is not practical or feasible, or where economies of scale or greater levels of discount and duration of provision could be achieved through alternative means and locations, in which case off-site provision and/or a financial contribution to a local authority affordable workspace fund should be made (Part D). Local Plans are to set out the circumstances in which off-site provision or payments in lieu are likely to be supported (Part C(7)), and the supporting text states that off-site provision and payments in

lieu "*may be particularly suitable for data centre and B8 storage or distribution development*" (paragraph 4.65).

3.2.7 Given that the need identified in BGP.007 is city-wide, a mechanism allowing off-site provision or contributions to be directed to the most suitable locations, including pooled contributions towards Council-led or provider-led schemes, would be more effective in meeting that need than a requirement confined to on-site provision only.

3.2.8 We would also highlight that neither Policy E4 nor its supporting text sets out the period for which affordable workspace is to be secured. A requirement to secure affordable workspace in perpetuity would be a fundamental obstacle for the funders of industrial and logistics development. Nor does BGP.007 indicate that the Viability Study tested the period for which affordable workspace would be secured, as opposed to the quantum and rent discount (BGP.007, paragraphs 4.2 to 4.7). Where affordable workspace policies are applied elsewhere, defined periods are commonly used. Even the Draft London Plan (2026), which seeks provision in perpetuity as a starting point, provides for a period of at least 15 years "*where this is not feasible or viable*" (paragraph 4.66), and requires Local Plans to set out the length of time for the affordable workspace provision (Policy GLE7, Part C(6)). Any requirement should be for a defined, viability-tested period, set out in the Plan.

3.3 Question 3

3.3.1 Question 3 asks:

> *"Precisely what is required of applicants to meet the requirements of Policy E4 and how will it be enforced? Is the policy effective?".*

3.3.2 As drafted, Policy E4 is not effective. It does not set out the quantum, rent discount, duration or form of affordable workspace required, and the Council confirms that no percentage or floorspace requirement is specified, even though the Viability Study indicates that one could be (BGP.007, paragraph 5.2). Applicants cannot therefore identify what is required of them, or reflect it in land values, contrary to paragraphs 16 d)[1] and 35[2] of the NPPF.

3.3.3 It is also unclear what Policy E4 requires. The policy itself states only that qualifying development proposals are "*expected to produce an affordable workspace strategy*", whereas the supporting text states that affordable workspaces "*should be delivered on-site*". The policy does not say whether an affordable workspace strategy must result in the provision of affordable workspace, or whether a strategy which demonstrates that provision is not practicable or viable would comply with it. That ambiguity should be resolved in the policy wording, rather than left to the supporting text or in an emerging Technical Advice Note.

3.3.4 Although Logicor welcomes the preparation of the Technical Advice Note, it will not form part of the statutory development plan and cannot introduce requirements which have implications for viability. The key parameters of the requirement must therefore be set out in the Local Plan itself.

[1] Paragraph 16 d) states that "*Plans should … contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*".
[2] Paragraph 35 states "*Plans should set out the contributions expected from development*".

3.3.5 This is consistent with the Draft London Plan (2026). Draft Policy GLE7 requires Local Plans themselves to set out the locations where the affordable workspace policy applies; the scale of floorspace that would trigger the requirement; the range of uses that can be delivered as affordable workspace; the amount to be provided (as a quantum or a percentage of floorspace); the expected average discount to market rents; the length of time for the provision; and the circumstances where off-site provision or payments in lieu are likely to be supported (Part C). Policy E4 sets out only the first two of these.

3.3.6 The Council states that it will usually use a legal agreement to secure affordable workspace commitments. Any such obligation must meet the tests at paragraph 58 of the NPPF. Where the identified market failure arises in the office and R&D market, it is not clear that a requirement placed on industrial and logistics development would be directly related to that development, or fairly and reasonably related to it in scale and kind.

3.3.7 To be effective, we consider Policy E4 and its supporting text should be modified to make clear:

- **Uses**: Which uses and Use Classes are expected to provide affordable workspace, and in what form.
- **Form of provision**: That provision may be made through a mix of units proposed (for example smaller units, makerspace or flexible lease terms), consistent with the glossary definition, which recognises that affordable workspace may be provided "*by providing suitable premises to meet end-user requirements*" (BGP.007, paragraph 3.8).
- **Off-site provision**: Introduce that off-site provision or a financial contribution in lieu will be accepted where on-site provision is not practicable or appropriate, with the basis of calculation set out in the Plan;
- **Net gain**: How the 5,000 sqm net gain is to be measured on a phased, masterplanned site such as the Site (Policy SPS17, criterion g)), which should be across the site as a whole against existing lawful floorspace;
- **Relationship with Policy E3 (Community Employment and Procurement Plans)**: That affordable workspace provided under Policy E3 criterion i) counts towards the requirements of Policy E4, to avoid duplicate obligations; and
- **Duration**: The defined period for which affordable workspace is to be secured.

3.3.8 There is every possibility that affordable workspace could come forward on the Unipart Site in due course, but any provision must respond to occupier demand in this location. Logicor does not yet have fixed redevelopment proposals, and Policy SPS17 anticipates a comprehensive, phased masterplan for the Site.

3.3.9 Policy E4 should therefore provide the flexibility to secure the benefit in the most effective way, so that it does not deter the modernisation and intensification that Policies E1 and SPS17 seek to support.

3.3.10 Logicor's suggested modifications to Policy E4 and its supporting text are set out in Section 4 of this Statement.

4 Modifications Sought

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

Table 4.1: Modifications Sought

No.	Modification Sought
Policy E3: Community Employment and Procurement Plans	
E3.1	**Policy E3 (preferred modification)**: replace the first paragraph of the policy with: "*Applicants 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 5,000 sqm (GIA) or more non-residential floorspace are encouraged to submit an Employment and Skills Plan (ESP), proportionate to the scale and nature of the development, setting out the employment, training and skills opportunities that the development will provide and how they will be promoted and delivered.*"
E3.2	**Policy E3 (alternative modification, should the Inspectors consider that a requirement is justified)**: replace the first paragraph of the Policy E3 with: "*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 5,000 sqm (GIA) or more non-residential floorspace should be supported by an Employment and Skills Plan (ESP), proportionate to the scale and nature of the development and having regard to the CITB Client Based Approach benchmarks (or any successor).* *The ESP should set out the employment, training and skills opportunities that the development will provide during the construction phase and, where the end user is known at the time of the application, during the operational phase, and how they will be promoted and delivered. ESPs should consider the following measures, where relevant to the development proposed:*"
E3.3	**Policy E3 criteria and securing mechanism**: delete criteria f), g) and i), and replace the paragraph beginning "*The City Council will usually use a legal agreement…*" with: "*ESPs will usually be secured by planning condition. Where the end user of the development is not known at the time of the application, the ESP will relate to the construction phase only. Where it is not practicable to deliver particular outputs directly, an alternative approach, including a financial contribution in lieu, may be agreed.*"
E3.4	**Supporting text**: insert a new bullet point under the 'Policy implementation' sub-heading:

	"*The City Council encourages developers, contractors and occupiers to pay the Oxford Living Wage, and will promote it through its wider partnership work to support an inclusive economy. The key requirements of ESPs are set out in Policy E3; the Technical Advice Note will provide guidance on preparing, implementing and monitoring ESPs within that framework.*"
Policy E4: Affordable Workspaces	
E4.1	**Policy E4**: insert the following text into the Policy after the list of sites: "*Affordable workspace should be provided on-site where practicable. Where on-site provision would not be practicable or appropriate, having regard to the operational requirements of the proposed use (including industrial, storage and distribution, and other single-occupier or specialist uses), or where greater benefit would be achieved, provision may be made off-site or through a financial contribution in lieu, secured through a legal agreement.* *Provision may include smaller units or premises suited to start-up and SME occupiers, consistent with the glossary definition of affordable workspace.* *The amount, form and duration of provision will be subject to viability, and affordable workspace will be secured for a defined period.*"
E4.2	**Supporting text (under the 'Policy implementation' sub-heading)**: amend the bullet point number 2 which states that "*Affordable workspaces should be delivered on-site*", to read: "*Affordable workspace should be delivered on-site where practicable and, where provided on-site, should be designed and fitted out to meet the needs of the sector for the future SME or Social Enterprise occupier (see glossary definition for more details).* *Where on-site provision is not practicable, including for industrial, storage and distribution and other single-occupier or specialist uses, off-site provision or a financial contribution in lieu will be accepted. Financial contributions will be used to support the provision of affordable workspace elsewhere in the city.*"
E4.3	**Supporting text (under the 'Policy implementation')**: insert a new bullet point to state that: "*The qualifying threshold will be measured as a net gain in floorspace across the site as a whole, against existing lawful floorspace, having regard to any agreed site-wide masterplan.* *Affordable workspace provided in accordance with Policy E3 criterion i) will count towards the requirements of Policy E4.* *The Technical Advice Note will set out the methodology for calculating financial contributions in lieu and the period for which affordable workspace is to be secured, within the parameters set out in the Plan.*"

5 Participation in Hearings

5.1 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:

- **Wednesday 2 December 2026** (morning) – Matter 8, Employment and Economic Development – Issues 1 and 2 (Policies E3 and E4) to assist the Inspectors on the modifications sought.

5.2 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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