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

Matter 10 Written Statement – 'Climate Change'

10 November 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 Logicor Cowley Investments Limited ('Logicor') (Respondent 117) in respect of the Oxford Local Plan 2045 ('the Plan') Examination.

1.2 The Plan was submitted for Examination on 14 July 2026. In accordance with the transitional arrangements 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 are therefore to the December 2024 version, and soundness is considered against the tests at paragraph 36.

1.3 Logicor controls the Unipart site at Watlington Road / Garsington Road, Cowley ('the Site'), which extends to approximately 32 hectares. The Site is a Category 1 Employment Site in the adopted Oxford Local Plan 2036 (Policies E1 and SP7) and a Key Employment Site in the submitted Plan (Policies E1 (Employment Strategy) and SPS17 (Unipart Site)).

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

1.5 Logicor does not seek to participate in the Matter 10 Hearing Session and asks the Inspectors to take this Written Statement into account in their consideration of Matter 10, Issue 1.

1.6 In summary, Logicor's position is that:

- Logicor supports the principle of net zero carbon buildings in operation and of new buildings not relying on fossil fuels for space heating, hot water and cooking. The outstanding concerns relate to how Policy R1 applies that principle to employment development, in particular Use Class B2 and B8 (alongside Use Classes E(g)(ii) and E(g)(iii), which would also be applied for at the Site), which could be unintentionally penalised, which could in turn impact on deliverability.

- The Council has not evidenced that Policy R1 can be achieved for industrial and logistics development. A single non-residential Energy Use Intensity ('EUI') target of 70 kWh/sqm/year has not been tested against Use Class B2 and B8 typologies, for which energy demand varies significantly by use and occupier and, on speculative schemes, will not be known or controlled by the applicant when a planning application is submitted.

- The renewable energy matching, offsite provision and offsetting requirements of Policy R1 criterion e) go beyond established carbon offsetting approaches. No offsite delivery mechanism has been identified, and the offsetting price and mechanism are deferred to a Technical Advice Note outside the Development Plan.

- The Council's Local Plan Viability Assessment Update (Document SUP.002) tests a less demanding policy position than the submitted Plan, and its conclusion that the Plan is viable relies on flexibility in Policy S4 (Plan Viability), which is not reflected in Policy R1 itself.

- In several respects, the policies depart from the Council's own evidence base without explanation or justification. These include the single non-residential EUI target, the uses eligible for a higher target, the offsetting mechanism, the absolute prohibition on fossil fuel usage and the test for demolition.

- Policies R2 and R3 also do not appear to have been drafted with Use Class B2 and B8 development in mind. The test for demolition in Policy R2a) is unclear, the Whole Life Cycle Carbon threshold is not supported by evidence, and Policy R3c) is a process requirement rather than a test of acceptability.

2 Response to the Inspectors' Questions within Matter 10, Issue 1

2.1 Question 1

2.1.1 Question 1 asks:

> *"Is the principle of net zero carbon buildings, including preventing the use of fossil fuels for cooking and heating, justified by available evidence and consistent with national planning policy?".*

2.1.2 Logicor supports the Council's ambition to reduce carbon emissions from new development and does not object to the principle of net zero carbon buildings in operation, or to the use of alternatives to fossil fuels for space heating, hot water and cooking. These objectives are consistent with paragraph 162 of the NPPF, which requires plans to take a proactive approach to mitigating and adapting to climate change, and with Section 1(1)(c) of the Planning and Energy Act 2008, which enables local planning authorities to set energy efficiency standards above those required by Building Regulations.

2.1.3 However, where a local plan seeks to impose standards that exceed national requirements, those standards must be supported by robust evidence that demonstrates they are feasible, deliverable and would not undermine viability. This principle is reflected in the Written Ministerial Statement on local energy efficiency standards dated 13 December 2023[1] and has been carried forward into Policy PM13 ('Setting Standards') of the NPPF published in August 2026.

2.1.4 Logicor recognises that the Plan is being examined against the December 2024 NPPF. However, the Written Ministerial Statement pre-dates that version of the NPPF and remains a material consideration. This was recognised by the Inspector examining Policy 2 ('Net-zero carbon development') of the Salt Cross Garden Village Area Action Plan,[2] a case study referenced in the Council's Net Zero Carbon Technical Feasibility Literature Review (2026). At paragraph 62 the Inspector stated "*I acknowledge that the WMS is a material consideration. It does not override the plan making obligation to address climate change and should be read in the context of wider national policy and legislative considerations*".

2.1.5 The key issue is therefore whether the specific requirements of Policy R1 are justified by proportionate evidence and deliverable across the development typologies anticipated by the Plan. For the reasons set out under Questions 2 to 4, we do not consider that the evidence before the Inspectors demonstrates this for employment development.

2.1.6 The limitations of the evidence base are acknowledged within the Council's own supporting documents. Background Paper 008 ('Carbon Reduction and Climate Resilient Design') recognises that the preferred approach to net zero buildings would "*risk not aligning with central government expectations (because it sets energy standards for development that exceed national standards)*" but concludes that the approach is necessary to support the

[1] Department for Levelling Up, Housing and Communities, Written Ministerial Statement: Planning - Local Energy Efficiency Standards Update (HLWS120), House of Lords, 13 December 2023.
[2] Report on the Examination of the Remitted Part of the Salt Cross Garden Village Area Action Plan, January 2026.

city's net zero objectives (paragraph 6.4). Similarly, Background Paper 008 acknowledges that requiring unregulated energy use to be addressed *"is not in line with the government's current policy guidance for Local Authorities*" (Table 5.1, option c).

2.1.7 In respect of the use of fossil fuels, we note that criterion d) of Policy R1 requires that no fossil fuels are "*directly utilised in the operation of the development*" and gas is referenced for heating and cooking. However, as drafted, the policy requirement would also apply to fuels used in industrial processes within Use Class B2 where a practicable electric alternative may not yet exist, and to emergency standby generation required by occupiers whose operations depend upon resilient power supplies. To be effective (NPPF paragraph 16(d)), the criterion should be limited to space heating, hot water and cooking only and should expressly exclude industrial processes where no alternative to fossil fuel currently exists and to standby generation used only in emergencies.

2.1.8 Criterion d) is also more restrictive than the Council's own evidence supports. Background Paper 008 acknowledges that "*there may be circumstances where there is a need for relying on fossil fuel systems – potentially where grid constraints are unable to support fully electric systems*" (Table 5.1, option a). The Background Paper also notes existing electricity network constraints across Oxfordshire (paragraph 3.11). However, criterion d) contains no flexibility to address either circumstance.

2.1.9 Finally, Logicor does not object to the encouragement of using low carbon energy centres and heat networks in Policy R1. However, this is guidance and should be moved to the supporting text, rather than included as a policy requirement.

2.2 Question 2

2.2.1 Question 2 asks:

> *"What evidence is there to demonstrate that the requirements of Policy R1 can be achieved from the development types supported by the Plan including high-energy uses such as commercial and economic development?".*

2.2.2 The principal evidence supporting Policy R1 is the Net Zero Carbon Technical Feasibility Studies Literature Review (2026). The review draws together studies prepared for other local planning authorities, rather than the modelling of development typologies in Oxford, and does not test B8 storage and distribution uses or large-format B2 buildings against the requirements of Policy R1.

2.2.3 The industrial typologies in the Literature Review demonstrate a wide range of outcomes, including: an EUI target of 35 kWh/sqm/year to an industrial unit in Essex; a light industrial unit having an EUI of just over 100 kWh/sqm/year in Central Lincolnshire; and EUI targets of 100 and 120 kWh/sqm/year for industrial units in Newham.

2.2.4 The evidence therefore demonstrates significant variation in energy demand between forms of employment development. It does <u>not</u> demonstrate that Policy R1 can be achieved consistently across the employment uses supported by the Plan.

2.2.5 The literature review itself has acknowledged these limitations. It notes that non-residential typologies "*have often not been looked at in the same level of detail*" (as residential typologies) and that "*it is not always clear how much of this is precautionary, due to lack of detailed evidence*" (paragraph 5.1). The review also relies principally on studies prepared

for other authorities between 2020 and 2023 and appears to carry forward the literature review prepared for the withdrawn Oxford Local Plan 2040. It does not reflect more recent updates to the case studies identified that are relevant to Policy R1, for example, the Salt Cross Garden Village Area Action Plan 2024 High Court judgment[3], the Inspector's report of January 2026 or the adoption of the Area Action Plan in February 2026.

2.2.6 Employment led development is typically speculative and often comes forward in outline, so the end occupier and the unregulated energy demand it will use is not always known at application stage. An Energy and Carbon Statement for such a scheme can only be indicative, but Policy R1 makes no provision for this. It should allow an indicative Statement based on reasonable assumptions, with detailed compliance secured by condition at pre-occupation stage, once an occupier is known.

2.2.7 Criteria a) and e) require all energy needs to be met through renewable sources, ideally generated onsite. For employment development, onsite generation can be constrained by roof area, orientation, structural loading and the capacity of the local electricity network. The supporting text recognises that "*some land uses and development typologies will inevitably struggle to achieve net zero carbon in operation through onsite solutions alone".*

2.2.8 The Council's own evidence recognises the need for flexibility. The literature review identifies energy-intensive non-residential uses requiring specific consideration, *"including"* research laboratories, leisure uses, commercial uses with high refrigeration or heating demands, convenience stores and data centres (paragraphs 4.18, 4.31, 4.32 and 5.8) and concludes that policy "*potentially needs to factor in additional flexibility to address the variable nature of non-residential uses*" (paragraph 5.9). However, criterion b)iii) provides clear flexibility only for "*R&D/labs/hospitals*". Hospitals are not identified in the evidence base, while other uses that are, have been omitted. The criterion therefore reflects neither the evidence base nor the range of employment uses that may come forward on Key Employment Sites and is not justified (NPPF paragraph 36(b)), while the policy and evidence base does not explain how "*exceptionally high*" demand (or technical infeasibility) will be assessed.

2.2.9 Criterion c) sets a space heating demand limit of 20 kWh/sqm/year. The literature review links the 15 to 20 kWh/sqm/year range to residential guidance (the Committee on Climate Change's UK Housing: Fit for the Future report) and notes that the UK Net Zero Carbon Buildings Standard has not yet set space heating targets for most non-residential typologies, which remain "*subject to further work*" (Table 1).

2.2.10 Logicor acknowledges that as per the literature review industrial units modelled in the Essex and Newham achieved lower space heating demand. However, Central Lincolnshire considered the target "*potentially challenging*" for some retail and industrial typologies (paragraph 4.5), and Greater Cambridge identified heat losses from "*large, open entrances/loading bays*" as a particular challenge (paragraph 4.31). Unlike criterion b), criterion c) contains no exception where the target is technically unfeasible to achieve, and on this basis, we do not consider this is justified (NPPF paragraph 36(b)).

[3] R (Rights: Community: Action Ltd) v Secretary of State for Levelling Up, Housing and Communities [2024] EWHC 359 (Admin). By order dated 4 March 2024, the Inspectors' report on the Salt Cross Garden Village Area Action Plan (1 March 2023) and the associated main modifications were quashed insofar as they related to Policy 2.

2.2.11 Criterion f) requires metering and post-completion monitoring. Logicor supports the objective of addressing the gap between designed and in-use performance of developments and accepts that a metering strategy can be provided at application stage. However, monitoring of multi-let and speculative buildings depends on occupiers' energy data, which the applicant may not be able to obtain, and the policy does not explain what would follow if performance differed from the design-stage assessment. Neither Background Paper 008 nor the literature review provides evidence supporting these requirements.

2.2.12 At the Salt Cross Garden Village Area Action Plan examination, we note that the Inspector found comparable metering, monitoring and data-sharing requirements to be unjustified and ineffective in their original form. They were made sound only by requiring the energy strategy to establish the scope and methodology for metering and monitoring, agreed on a case-by-case basis, and secured through planning conditions or obligations. We consider criterion f) should be amended on a similar basis, limited to landlord-controlled systems for speculative and multi-let buildings, and should not make compliance dependent upon occupiers' operational energy performance.

2.2.13 The paragraph following criterion f) also applies to extensions, conversions and changes of use. Extensions to employment buildings must meet criteria a) to c), and any conversion or change of use that creates a self-contained non-residential unit must meet every criterion. Refurbishment and subdivision are common ways of modernising industrial estates and applying new-build EUI and space heating standards to existing building fabric may be technically unachievable and risks discouraging re-use, which is contrary to Policy R2a) that promotes re-use over demolition.

2.3 Question 3

2.3.1 Question 3 asks:

> *"What is the justification for using a total Energy Use Intensity ('EUI') figure, rather than, for example, a Target Emission Rate ('TER')? What are the EUI targets based on and are they justified and achievable?".*

2.3.2 The NPPF is not prescriptive on a metric for local energy efficiency standards. However, Building Regulations are and Part L requires both dwellings and non-domestic buildings to meet a Target Emission Rate ('TER') and a Target Primary Energy Rate, using an approved dynamic simulation model for non-domestic buildings.

2.3.3 The Written Ministerial Statement of 13 December 2023 stated that any local standard going beyond Building Regulations should be expressed as a percentage uplift on a dwelling's TER. That approach is carried forward in Policy PM13 ('Setting standards') of the NPPF published in August 2026. Although that policy refers to dwellings, the same reasoning applies to non-residential development.

2.3.4 A TER-based approach can be assessed using calculations already required for Building Regulations. Policy R1 instead introduces a separate EUI-based framework, to be set out in a Technical Advice Note that is yet to be drafted, which will create a parallel compliance regime with its own assumptions and modelling requirements.

2.3.5 This may be particularly challenging for employment development because a total EUI target captures both regulated and unregulated energy demand. Where regulated energy

is influenced by the design of the building, unregulated energy is largely determined by the occupier's operations. For speculative and outline employment schemes, unregulated energy cannot be predicted with any certainty at application stage and may change significantly over time.

2.3.6 The Council's own evidence acknowledges this limitation. Background Paper 008 notes that unregulated energy use is "*predominantly determined by occupant behaviour within the building once in operation, something that planning policy and the design/construction process has limited influence on*" (Table 5.1, option c) and that unregulated energy demand may account for "*up to 50% of energy demand in a new building*" (paragraph 4.5). As set out in Logicor's Regulation 19 representations, Policy R1 should therefore focus on regulated energy performance, with measures to reduce unregulated energy encouraged rather than mandated by policy.

2.3.7 Logicor acknowledges that EUI targets have been adopted elsewhere, including in the Salt Cross Garden Village Area Action Plan. However, at Salt Cross, the Inspector accepted the use of an EUI target because it was justified by the evidence, including specific typology modelling and viability testing for the Garden Village. Even then, the Inspector recognised that energy demand is difficult to predict for some uses and EUI targets were only set for residential, school and office development. Targets for other uses are to be agreed with the Council, and it's recognised within the Area Action Plan that technical and viability constraints may prevent compliance.

2.3.8 Oxford's evidence is materially different. The literature review contains no Oxford-specific typology modelling and does not test industrial or logistics development against Policy R1. Neither Policy R1 nor its supporting text explains the basis for the non-residential EUI target of 70 kWh/sqm/year. The literature review indicates that the figure corresponds with the office target used in the Essex study and the adopted Salt Cross Area Action Plan and falls within the UK Net Zero Carbon Buildings Standard range for general offices of 64 to 80 kWh/sqm/year. The target therefore appears to be specific to offices. If the Council intends that the target should apply to office development only, which the evidence would support, the policy should say so and explain how targets for other employment uses will be set. Without that clarity, the policy is not effective (NPPF paragraph 16(d)).

2.4 Question 4

2.4.1 Question 4 asks:

> *"Have the requirements of Policies R1 and R2 been subject to appropriate viability testing? Combined with other policy requirements, will the development proposed by the Plan be viable and developable?".*

2.4.2 Logicor does not consider that the Local Plan Viability Assessment Update (Background Document SUP.002) ('the Viability Assessment') assesses Policies R1 and R2 as drafted across the employment typologies supported by the Plan and in several respects, it tests a less demanding policy position. For operational net zero, the Viability Assessment applies a single cost uplift of 5% of base build costs to all development types, including residential and non-residential (paragraph 4.21), which is derived from studies prepared for other local authorities rather than typologies tested in Oxford (paragraphs 4.19 and 4.20). Additionally, the Viability Assessment does not separately cost the requirements of criteria b), c) and e) of Policy R1, including the EUI targets, the space heating demand limit and the requirement to match total energy demand through renewable generation.

2.4.3 The Viability Assessment is also inconsistent on the effect of those costs. The summary and conclusions state that the allowance reduces residual land values by "*typically 8%*" (paragraphs 1.7 and 7.2), whereas paragraph 6.40 records a typical reduction of "*circa 15%".*

2.4.4 The Viability Assessment assumes that developments in Oxford will not generally need to rely on offsetting measures and that any offsetting costs, estimated at approximately 0.8% to 0.9% of construction costs, can be accommodated within the overall 5% allowance (paragraph 4.23). However, this assumption has not been tested against employment uses with high or process-driven energy demand.

2.4.5 For some, critical supply chain industrial processes, including cold storage, advanced manufacturing or digital infrastructure, onsite renewable generation is unlikely to match total energy demand, so offsite provision or offsetting under criterion e) would be the norm rather than the exception. Where onsite generation is insufficient, criterion e) requires equivalent renewable generation to be provided at an offsite location and for this to be secured and operational when the development is completed. The Council has not identified any delivery mechanism for achieving this outcome and the supporting text refers only to sites "*elsewhere in the city where sites are available*".

2.4.6 This raises significant viability and deliverability concerns. In a tightly constrained urban area such as Oxford, where the Council's Growth Strategy is focussed on the delivery of housing on any windfall sites that may come forward over the Plan period, applicants for employment development may have no access to suitable offsite land for energy generation. The infrastructure and grid connection costs of dedicated offsite generation could fall entirely on individual schemes, and requiring the energy generation to be operational on completion of the development, could introduce programme risks outside the applicant's control. In addition, the policy does not recognise renewable electricity procurement through the grid, or the continued decarbonisation of the national electricity network.

2.4.7 The proposed offsetting mechanism is also insufficiently defined. Policy R1 requires all residual energy demand, including unregulated energy demand, to be offset, which goes significantly further than established approaches for offsetting, for example, London Plan Policy SI2 ('Minimising Greenhouse Gas Emissions'), where offsetting relates to residual regulated carbon emissions remaining after on-site reductions.

2.4.8 The price of offsetting, the calculation methodology and the arrangements for spending contributions are also not set out in the Plan. They are deferred to an Energy and Carbon Technical Advice Note, which is not yet available, will not form part of the Development Plan and is not before this Examination. Given that these matters directly affect development costs and viability, they should be set out in the Plan itself.

2.4.9 The Council's evidence is also inconsistent on the purpose of offsetting. Background Paper 008 ('Carbon Reduction and Climate Resilient Design') describes an "*energy offsetting*" mechanism funding retrofit projects within the city, while the literature review recommends contributions towards additional renewable generation. Retrofit may reduce energy demand elsewhere but does not generate renewable energy, so would not achieve the policy objective of matching energy demand through renewable generation. The Plan does not explain how offset projects would be identified, managed or monitored, or how a genuine one-to-one offset would be achieved.

2.4.10 In relation to embodied carbon, the Viability Assessment tests Policy R2 on the basis that embodied carbon would be measured, with reductions addressed principally through Building Regulations and future national standards (paragraphs 2.43, 6.39 and 6.53). However, the submitted policy imposes stricter requirements:

- Criterion g) requires specified reductions in embodied carbon for schemes above particular thresholds; and
- Criterion a) requires applicants to robustly demonstrate that re-use is unfeasible before demolition will be supported.

2.4.11 Neither requirement appears to have been separately costed.

2.4.12 Where the Viability Assessment has tested embodied carbon reductions, through a combined 15% build-cost uplift, residual land values fell by approximately 18% for B2 and B8 typologies and approximately 67% for light industrial development, with some previously viable schemes becoming unviable (Table 6.42.1; paragraphs 6.43 and 6.53).

2.4.13 The Viability Assessment's conclusion that the Plan is viable also depends on flexibility provided through Policy S4 ('Plan Viability'), which states:

> *"Where it is clearly demonstrated that any offsetting against the targets in Policy R1 Net Zero Buildings in Operation cannot be fully achieved, payments towards energy offsetting should be reduced incrementally until viability is achieved. The development itself must remain free of fossil fuel use to ensure that it is net zero carbon ready and does not conflict with Net Zero Carbon targets for the city and nationally*".

2.4.14 Policy R1 itself contains no equivalent viability exception, allowing departure only where requirements are technically unfeasible. If the Plan's viability relies on that flexibility, it should also be included in the wording of Policy R1 itself (Modification R1.10).

2.4.15 In summary, we do not consider that Policies R1 and R2 have been subject to sufficient viability testing in respect of employment development, including Use Classes B2 and B8, and the evidence base does not demonstrate that the Plan's combined requirements will be viable across employment development contrary to NPPF paragraph 36 b).

2.5 Question 6

2.5.1 Question 6 asks:

> *"What is expected of development proposals under Policy R2a)? Is the policy requirement justified and effective?".*

2.5.2 Policy R2a) requires that re-use of any existing buildings on a site "*has been explored and robustly demonstrated to be unfeasible before resorting to demolition*". The supporting text describes a lesser test. It states that the policy "*does not mandate retention of existing buildings*", and that criterion a) seeks to ensure applicants "*have considered whether it is feasible*" to retain and re-use buildings. It goes on to give examples of where replacement may be justified. Applicants and decision-makers cannot tell which test applies, so the policy is not clear or effective (NPPF paragraph 16(d)).

2.5.3 The test also departs from the Council's evidence. Background Paper 008 recognises that the question "*is it more sustainable to retain an energy inefficient building or demolish to provide a highly energy efficient replacement?*" is one to which "*there are not always definitive answers*" (paragraph 3.9). The preferred option for the policy was framed around "*the importance of retaining existing buildings where possible*", with principles that "*need to retain a level of flexibility*" and "*remain flexible enough to respond to the varying context*" of each application (Table 5.2, option a; paragraph 6.8). The "*robustly demonstrated to be unfeasible*" test in the submitted policy is not that approach.

2.5.4 As with Policy R1, Policy R2 does not appear to have been drafted with B2 and B8 development in mind. Much existing industrial and logistics stock on Oxford's existing employment sites is functionally obsolete for modern occupiers, because of eaves heights, floor loading, yard depth, servicing arrangements and energy performance (including the minimum energy efficiency standards for letting) and in many cases, refurbishment alone cannot address these constraints.

2.5.5 Logicor supports the principle of considering re-use before demolition. However, for Policy R2 a) To be justified and effective, criterion a) should require re-use to have been considered, with any demolition justified proportionately, having regard to the condition, functionality and energy performance of the existing buildings, the operational requirements of the proposed use and the Plan's objectives for the intensification of employment sites.

2.6 Question 7

2.6.1 Question 7 asks:

> *"What are the thresholds in Policy R2 based on?".*

2.6.2 Policy R2 requires proposals comprising 100 or more dwellings, or 10,000 sqm or more of non-residential floorspace, to provide a measurement of total embodied carbon, including a Whole Life Cycle Carbon Assessment ('WLCCA') (criterion f). Such proposals must also demonstrate the specific quantitative reductions in embodied carbon secured through the design process (criterion g).

2.6.3 The evidence for these thresholds is limited. Background Paper 008 acknowledges that WLCCAs "*can be resource intensive*" and that "*setting an alternative/appropriate threshold for where these would be required may require further consideration*" (Table 5.2, option b). The evidence nor the Plan does not explain why 10,000 sqm was selected for all non-residential development and does not assess the implications for different uses.

2.6.4 A single floorspace threshold does not reflect the characteristics of industrial and logistics development. Warehouses are predominantly single-storey, and the 10,000 sqm threshold could capture a relatively modest, mid box industrial and logistics scheme, and treat it in the same way as a multi-storey office or laboratory of equivalent floorspace, despite there being substantial differences in construction, embodied carbon and the scope for design-led reductions. The evidence does not support a common threshold, and it is recommended Use Classes B2/B8 are excluded.

2.6.5 Policy R2 also does not reflect how speculative employment development is delivered. The applicant typically constructs a shell (with the occupier undertaking the fit-out), meaning the applicant cannot reasonably assess at application stage the embodied carbon of works that are unknown.

2.6.6 This is particularly relevant to criterion g), which requires "*specific quantitative reductions*" in embodied carbon but does not identify the baseline against which they are to be assessed. Background Paper 008 acknowledges that this approach "*risks a lack of clarity for applicants about how far the Council expects them to go*" (Table 5.2, option b), and the detail is deferred to the Technical Advice Note, which is not before the Inspectors.

2.6.7 To be justified and effective, the thresholds should be supported by evidence that they are appropriate for the different employment typologies supported by the Plan. For speculative employment development, criteria f) and g) should apply only to the base build, and the benchmark against which reductions are measured should be set out in the Plan.

2.7 Question 8

2.7.1 Question 8 asks:

> *"What is the justification for Policy R3c), which refers to "professional advice"? How does this relate to the acceptability of a development proposal? Is the policy justified and effective?*

2.7.2 Policy R3 c) requires that "*professional advice has been sought from historic* environment and energy/climate experts to inform proposals where necessary/appropriate". The policy also refers to "*traditional buildings, including heritage assets*" without defining "*traditional buildings*".

2.7.3 Seeking professional advice should not determine a proposal's acceptability. Policy R3 does not define when advice is required, who qualifies as an expert, or how advice should be evidenced. Criterion c) is therefore unclear and would be more appropriately included as supporting guidance rather than policy.

2.7.4 Logicor supports retrofit measures that improve energy efficiency. However, the policy should clarify that the additional whole building approach requirements apply only to traditional buildings and heritage assets, not modern employment buildings. This is consistent with the Council's evidence in Background Paper 008.

3 Modifications Sought

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

Table 3.1: Modifications Sought

No.	Modification Sought
Policy R1: Net Zero Buildings in Operation	
R1.1	**Outline and speculative proposals:** add provision for outline and speculative proposals to submit an indicative Energy and Carbon Statement based on reasonable assumptions, with detailed compliance secured by condition at pre-occupation stage, once the occupier is known.
R1.2	**Criterion b):** express the energy standard as a percentage improvement on the Building Regulations Target Emission Rate, consistent with the national framework. If an EUI metric is retained, apply it to regulated energy only, with measures to reduce unregulated energy encouraged.
R1.3	**Criterion b)iii):** extend to "*other non-residential uses with exceptionally high or process-driven energy demands, including R&D/labs/hospitals*, *uses with high refrigeration demand such as (but not limited to) cold storage, data centres and advanced manufacturing*".
R1.4	**Criterion c):** apply the space heating demand target to residential and office development only, with targets for other non-residential uses to be agreed with the Council on a case-by-case basis having regard to the nature of the use.
R1.5	**Criterion d):** limit use of fossil fuels for space heating, hot water and cooking. Exclude industrial uses where it is evidenced that no alternative fuel currently exists, standby generation used only in an emergency and allow an exception where grid constraints prevent a fully electric solution, as recognised in the Council's own evidence base in Background Paper 008.
R1.6	**Criterion e):** delete the requirement for offsite provision to be "*fully secured and in operation upon completion*". Recognise grid connection supported by renewable electricity procurement. Set out the offsetting price, method of calculation and use of payments in the Plan, with offsetting limited to residual regulated energy and payments used to fund new offsite renewable generation, consistent with the literature review.
R1.7	**Criterion f):** require the energy strategy to set out the scope of metering and monitoring, with the methodology agreed with the Council and proportionate to the development.
R1.8	**Heat networks:** move the paragraph on low carbon energy centres and heat networks to the supporting text.

R1.9	**Criterion g):** allow a case for less than full compliance to be made on viability grounds, as well as technical feasibility, consistent with the flexibility provided by Policy S4 on which the Viability Assessment relies.
Policy R2: Embodied Carbon in Construction	
R2.1	**Criterion a):** replace with a requirement that re-use of existing buildings has been considered and that any demolition is justified proportionately, having regard to the condition, functionality and energy performance of the existing buildings, the operational requirements of the proposed use and the Plan's objectives for the intensification of employment sites.
R2.2	**Thresholds:** justify the 10,000 sqm non-residential threshold for criteria f) and g) with evidence and review the effectiveness and necessity for single-storey industrial and logistics development.
R2.3	**Criteria f) and g):** for speculative non-residential development, apply to the base build only. Set out in the Plan the baseline or benchmark against which "*quantitative reductions*" are to be measured.
Policy R3: Retro-fitting Existing Buildings	
R3.1	**Criterion c):** delete from the policy and move to the supporting text as guidance on preparing applications.
R3.2	**Traditional buildings:** define "*traditional buildings*" and confirm that the whole building approach requirements do not apply to modern employment buildings.

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