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

Matter 11 Written Statement – ‘Infrastructure and Viability’

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 Logicor does not seek to participate in the Matter 11 hearing session and asks that the Inspectors take this Written Statement into account in their consideration of the Matter.

1.3 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.

1.4 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).

1.5 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.

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

1.7 Table 1.1 details the questions this Written Statement responds to.

Table 1.1: Questions Responded To

No.	Question
Matter 11, Issue 1: Infrastructure Delivery (Policy S3)	
1	What is the justification for requiring financial contributions from trip-generating uses within a 1,500m buffer of the proposed Cowley Branch Line stations, and is the buffer based on appropriate evidence?
Matter 11, Issue 2: Viability (Policy S4)	
1	Does the Local Plan Viability Assessment Update demonstrate that the growth proposed will remain viable across all typologies in all locations?

2	Is reliance on trade-offs between policy objectives, and site-specific viability testing, at the development management stage consistent with the NPPF (paragraph 59) and the PPG?

1.8 In summary, Logicor's position is that:

- Logicor supports the reopening of the Cowley Branch Line, but the current approach to the contribution requirement set out in Policy S3 is not proportionate or justified. Neither the Plan nor the Infrastructure Delivery Plan sets out the share of cost to be met by development, or the rate or method on which contributions are based; the 1,500m buffer is not supported by evidence and makes no provision for sites that fall only partly within it; and a single requirement does not reflect the trips generated by different uses or the net additional trips (i.e. change in impact) generated by redevelopment.

- The Local Plan Viability Assessment Update ('the Viability Assessment') does not demonstrate that the growth proposed will remain viable across all typologies in all locations. It does not test employment uses with high energy demand or the phased redevelopment of operational employment estates, and its industrial benchmark land value understates the existing use value of such sites.

- Deferring trade-offs between policy objectives to the development management stage is inconsistent with paragraphs 35 and 59 of the NPPF and the Planning Practice Guidance ('PPG'). The employment-generating uses cascade in Policy S4 does not address all the contributions sought from employment development.

- Logicor seeks the modifications set out in Table 4.1.

2 Response to the Inspectors' Questions within Matter 11, Issue 1: Infrastructure Delivery

2.1 Question 1

2.1.1 Question 1 asks:

> *"What is the justification for requiring financial contributions towards public transport enhancements, from trip-generating uses within a 1,500 m buffer zone of the proposed Cowley Branch Line stations? How has the zone been established and is it based on appropriate available evidence?"*

2.1.2 Logicor supports the reopening of the Cowley Branch Line to passengers. The Site is within the Cowley Branch Line Area of Focus and only part of the Site lies within the 1,500m buffer of the proposed Oxford Cowley station, with the majority of the Site more than 1,500m from it. Logicor's concern, as set out in its Regulation 19 representations, is that contributions sought from development must be proportionate and fairly and equitably distributed amongst all responsible developers. As drafted, Policy S3 (Infrastructure Delivery in New Development) does not achieve this and Logicor does not consider that the Infrastructure Delivery Plan ('IDP') (CSD.006) provides the evidence needed to justify it.

2.1.3 Policy S3 expects financial contributions from all new trip-generating development within the 1,500m buffer "*in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL*". The Policy does not identify the cost of the infrastructure to be funded, the share expected from development, or the rate or method by which contributions will be calculated. The supporting text states that "*certain sites within the Cowley Branch Line Area of Focus*" will be expected to contribute, which is narrower than Policy S3 itself.

2.1.4 The Infrastructure Delivery Schedule in the IDP identifies two Cowley Branch Line schemes:

1. **Scheme T7** (including passenger reopening, mainline capacity works and two new stations) is costed at £155 million, of which £120 million of Government funding is confirmed; and

2. **Scheme T8** (a public realm and connectivity programme, including a pedestrian bridge and active travel improvements) is costed at £20 million, with no funding confirmed.

2.1.5 Taken together, these indicate a remaining gap of around £55 million.

2.1.6 The IDP does not identify what proportion of that gap is to be met by developer contributions, how contributions are to be apportioned between developments, or the area from which they will be sought. It makes no reference to the 1,500m buffer or to a contribution rate. Network Rail is the only delivery body listed for either scheme, whereas developer contributions are identified for other South Area infrastructure schemes, such as the Cowley Road / Garsington Road / Watlington Road corridor improvements (Scheme T19).

2.1.7 The Viability Assessment tests a Cowley Branch Line contribution of £36.18 per sqm on employment floorspace (paragraph 4.34). Neither the Plan nor the IDP explains how that figure has been derived or how it relates to the funding gap. Without that evidence, the Council cannot demonstrate that contributions meet the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended), to which Policy S3 itself refers, and which are reflected in paragraph 58 of the NPPF. Nor does the Plan "*set out the contributions expected from development*", as paragraph 35 of the NPPF requires, or make clear how a decision maker should react to proposals (paragraph 16(d)).

2.1.8 The IDP classifies Schemes T7 and T8 as 'Transformational' rather than 'Critical' or 'Essential' infrastructure. Transformational infrastructure is defined in the IDP as that which "*brings significant additional social, environmental or economic benefits in addition to the mitigation or wider benefits delivered by the traditional infrastructure categories*" (paragraph 8.6), whereas Essential infrastructure is that which "*will mitigate impacts arising from development*" (paragraph 8.5). Logicor notes that the IDP states its prioritisation should not be read as indicating that lower priority schemes are not necessary to make development acceptable (paragraph 8.4). Nonetheless, the Council's own evidence characterises the Cowley Branch Line as delivering benefits beyond the mitigation of development impacts. That does not demonstrate that a contribution from every trip-generating development within the buffer is necessary to make the specific development acceptable in planning terms.

2.1.9 The scope of the requirement is also unclear. Policy S3 refers to "*public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL*", and the IDP identifies several other public transport schemes in the South Area, including Schemes T10 and T19. The IDP confirms that the Community Infrastructure Levy ('CIL') is the Council's main source of developer funding for infrastructure, supplemented by Section 106 contributions for specific schemes where the Regulation 122 tests are met (paragraph 3.24). Neither the Plan nor the IDP identifies which schemes are to be funded through Policy S3 contributions and which through CIL, so there is a risk that development could contribute twice towards the same infrastructure (i.e. "double recovery").

2.1.10 The Policy applies a single requirement to all trip-generating uses. The Cowley Branch Line will principally serve people travelling to and from employment and residential development; the supporting text refers to Oxford Science Park and ARC Oxford. Industrial and logistics uses (Use Classes B2 and B8) have low employment densities and generate far fewer person trips per sqm than office, research and development or laboratory uses. Any redevelopment of the Site would also seek flexibility for Use Classes E(g)(ii) and E(g)(iii) alongside Use Classes B2 and B8; a single requirement takes no account of the mix of uses proposed or the trips that mix would generate. A contribution that does not reflect the trips a development generates is not fairly and reasonably related in scale and kind to it.

2.1.11 The Policy also refers to "*new trip-generating development*" without defining whether this means net additional trips. The redevelopment, intensification or reconfiguration of existing employment sites, including the phased redevelopment of the Unipart Site, will in part replace trips that already occur.

2.1.12 Trips generated by an existing lawful use are part of the baseline and are not an impact of the new development, therefore, requiring a contribution from them would not be necessary to make the development acceptable in planning terms, nor would it be fairly and reasonably

related to the impact in scale and kind (Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended); NPPF paragraph 58).

2.1.13 This is consistent with how transport impacts are assessed, in that transport assessments measure the change of a proposed development in relation to existing, baseline trip generation. This approach is also consistent with the Community Infrastructure Levy, where floorspace in lawful use is deducted from the chargeable area (Schedule 1 to the 2010 Regulations). Charging financial contributions on gross floorspace, without having due regard for any existing floorspace, would also penalise the modernisation and renewal of existing employment sites relative to new development on vacant land. That could potentially prevent the modernisation and intensification of Key Employment Sites that Policies E1 and SPS17 of the Plan support and the effective use of previously developed land. We consider contributions should therefore apply only to the net additional trips generated.

2.1.14 Logicor is not aware of evidence in the examination library, including the IDP, explaining how the 1,500m buffer has been established. Walking catchments commonly applied to rail stations are shorter. For example, Transport for London's Public Transport Accessibility Levels methodology uses a 960m (12-minute) walk to a rail or Tube station[1].

2.1.15 The Policy is also unclear as to how it applies to sites that fall only partly within the buffer. The majority of the Site lies more than 1,500m from the proposed Oxford Cowley station, with only part of the Site within the buffer. As drafted, Policy S3 could be read as requiring a contribution from all trip-generating development across the whole Site, irrespective of where that development is located in relation to the station. By contrast, a site lying immediately beyond the edge of the buffer, at a materially similar distance from the station, would not be required to contribute at all. Applying the buffer as a rigid line in this way would not produce contributions that are fairly and reasonably related in scale and kind to the development (Regulation 122(2)). A proportionate approach is required, whereby contributions are sought only in respect of development within the defined area, having regard to its actual accessibility to the station, rather than from the entirety of any site that is partly within it.

2.1.16 The contribution is significant for employment development. At £36.18 per sqm, it exceeds, and effectively doubles, the CIL rate for B2 and B8 uses (£35.24 per sqm) and accounts for over a third of the non-build policy costs assumed in the Viability Assessment's employment appraisals. It is not included in the employment-generating uses viability cascade in Policy S4 (see Section 3).

2.1.17 To be justified and effective, Policy S3 and the IDP should:

i. Identify the schemes to be funded through contributions and the share of their cost to be met by development;

ii. Set out the rate and method by which contributions will be calculated;

iii. Relate contributions to the net additional trips generated by the development and the nature of the use;

[1] Transport for London (2015) Assessing transport connectivity in London, Section 2.5 and Table 2.1, p.18. Available at: https://content.tfl.gov.uk/connectivity-assessment-guide.pdf

iv. Define and map any buffer by reference to evidence, and confirm that, where a site lies only partly within the buffer, contributions will be sought only in respect of development within it; and

v. Provide for contributions to be returned if the Cowley Branch Line is not delivered within a reasonable period.

2.1.18 Modifications S3.1 and S3.2 are set out in Section 4.

3 Response to the Inspectors' Questions within Matter 11, Issue 2: Viability

3.1 Question 1

3.1.1 Question 1 asks:

> *"Does the Local Plan Viability Assessment Update demonstrate that the growth proposed in the Plan will remain viable across all typologies in all locations?"*

3.1.2 The Viability Assessment does not demonstrate that the growth proposed in the Plan will remain viable across all typologies in all locations, but Logicor accepts that it does not claim to. The findings of the Viability Assessment that the cumulative results are "*hugely variable*" and that trade-offs between policy objectives will be required acknowledge that not all relevant policies can be delivered on all sites.

3.1.3 The employment typologies tested in the Viability Assessment are light industrial (Typology 20), office and research and development (Typologies 23 and 24), and two generic B2/B8 schemes of 20,000 sqm on 3.33 hectares and 1,000 sqm (Typologies 25 and 26) (Table 4.1.1). There is no typology for employment uses with high or process-driven energy demand, such as advanced manufacturing, cold storage or data centres, and nothing for the conversion, subdivision or phased redevelopment of an existing, occupied employment estate. These are the forms of development most likely to come forward on Key Employment Sites, including at the Site.

3.1.4 The Viability Assessment's testing of the climate change policies shows that even small increases in build costs significantly reduce the viability of employment development. The 5% build cost uplift applied for Policy R1 (Net Zero Buildings in Operation) sits below the top of the Viability Assessment's own range of 4 to 7% for industrial uses (paragraph 4.20) and reduces residual land values by around 6% for B2 and B8 and around 22% for light industrial (Table 6.40.1). Where operational and embodied carbon requirements were tested together (a 15% uplift), residual land values fell by around 18% for B2 and B8 and around 67% for light industrial, and some schemes that were viable became unviable (Table 6.42.1; paragraphs 6.43 and 6.53).

3.1.5 The Viability Assessment also assumes that energy offsetting under Policy R1 will be exceptional (paragraph 4.23), which will not be the case for high-energy uses, as set out in Logicor's Written Statement on Matter 10.

3.1.6 The Viability Assessment therefore only concludes that the Plan's policies are viable because Policy S4 allows them to be applied flexibly (paragraph 6.54; Appendix 1) – although this shows that the policies can be viable if they are relaxed on a site-by-site basis, it does not show that the growth proposed will remain viable across all typologies and locations with the policies applied as drafted.

3.2 Question 2

3.2.1 Question 2 asks:

"The Viability Assessment states that where the cumulative impact of policies is concerned, the results are "…hugely variable and it is likely that some trade-offs between policy objectives will be required at the development management stage". It then goes on to recognise that "…this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage". However, is this approach consistent with the Framework and the PPG? Paragraph 59 of the Framework advocates that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable".

3.2.2 Paragraph 59 of the NPPF provides that, where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable, and that it is for the applicant to demonstrate whether particular circumstances justify a viability assessment at the application stage.

3.2.3 The PPG states that viability should be assessed primarily at the plan-making stage, to ensure that "*the total cumulative cost of all relevant policies will not undermine deliverability of the plan*" (paragraph 002). The circumstances the PPG gives for site-specific assessment include development of a type not tested in the plan-wide assessment or a significant change in economic conditions (paragraph 007).

3.2.4 An approach that anticipates a higher volume of site-specific viability testing because the cumulative policy burden is "*hugely variable*" conflicts with that position. Viability would need to be resolved application by application, rather than through the Plan, and compliance with the Plan would no longer provide the assurance of viability that paragraph 59 of the NPPF requires.

3.2.5 Paragraph 35 of the NPPF requires plans to set out the contributions expected from development and states that such policies should not undermine the deliverability of the plan. The PPG confirms that different requirements may be set for different types or locations of site, as well as for different types of development (paragraph 001). If trade-offs between policy objectives are needed, the Plan should set out which requirements are to give way, in what order and for which types of development. Leaving them to negotiation on a case-by-case basis is inconsistent with paragraph 16(d) of the NPPF.

3.2.6 For example, Policy S4 (Plan Viability) does not do this for employment development. The first paragraph of Policy S4 states that compliant applications will "*generally*" be assumed to be viable. However, the employment-generating uses cascade in the policy has two steps only, including reducing energy offsetting payments under Policy R1 and then reducing affordable housing contributions (the latter of which is not applicable to Use Class B2 and B8 development). Policy S4 does not address Cowley Branch Line contributions under Policy S3, affordable workspace requirements under Policy E4, community employment and procurement plans under Policy E3, nor the on-site energy generation requirements of Policy R1.

3.2.7 To be consistent with national policy, the Plan should set out in Policy S4 the order in which all relevant requirements on employment development may be relaxed in order to achieve viability for a development, as well as the types of development not tested where site-specific assessment may be justified. Modifications sought are set out in Section 4.

3.2.8 Logicor's Written Statement on Matter 10 also seeks a related modification to Policy R1.

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 S3: Infrastructure Delivery in New Development	
S3.1	Replace the final two sentences of the Cowley Branch Line paragraph with: *"Proportionate financial contributions will be sought from development within the defined area of the proposed CBL stations, as shown on the Policies Map, that generates a net increase in trips, towards the public transport enhancements identified in the Infrastructure Delivery Plan, including the delivery of the CBL.* *Contributions will be calculated in accordance with the methodology set out at Appendix X, having regard to the net additional trips generated by the development and the nature of the use.* *Contributions will only be sought where they meet the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) and paragraph 58 of the NPPF (or updated equivalent)."* Add supporting text, and update the IDP, to set out the schemes to be funded (with reference to Schemes T7 and T8), the share of the funding gap to be met by developer contributions, the contribution rate, the approach to sites lying only partly within the defined area, and the evidence for the extent of the area.
S3.2	Add to Policy S3: *"Contributions secured towards the Cowley Branch Line that have not been committed to its delivery within X years of receipt will be returned, unless otherwise specified in the relevant planning obligation."*
Policy S4: Plan Viability	
S4.1	Amend the first paragraph of Policy S4 and add a new paragraph after it: *"The policies in the Plan have been viability tested and planning applications that fully comply with them will be assumed to be viable.* *Site-specific viability assessment may be justified where development is of a type not tested in the Local Plan Viability Assessment, including employment uses with high or process-driven energy demand and the phased redevelopment of existing, occupied employment sites."*

S4.2	Extend the employment-generating uses viability cascade to cover all contributions sought from employment development, by adding: *"Step 3), other contributions – If the development remains unviable after step 2, contributions towards public transport enhancements under Policy S3 and affordable workspace provision under Policy E4 should be reduced incrementally until viability is achieved."*

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