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OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Dr Thomas Rocke

Organisation (if applicable): Rocke Associates Ltd on behalf of Oxford Westgate Alliance

Address: [redacted]

Email: [redacted]

Date: 13 March 2026

Data protection:
Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☐ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☒ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number		Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	○ Yes	☒ No
(b) is sound?	☒ Yes	○ No
	○	○

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☐	(d) consistent with national policy?	☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

OXFORD LOCAL PLAN 2045

SUBMISSION DRAFT (REGULATION 19)

JANUARY 2026

REPRESENTATIONS

PREPARED ON BEHALF OF

WESTGATE OXFORD ALLIANCE

Rocke Associates

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Date of Issue: March 2026

1. Introduction

1.1 These representations have been prepared by Rocke Associates on behalf of the Westgate Oxford Alliance (WOA) who own and manage the Westgate Centre in Oxford City Centre.

1.2 The representations on behalf of the WOA comprise the following documents:

- Representation Forms (Parts A and B)
- Representations prepared by Rocke Associates (current document)

2. Representations

Policy C1 (City, District and Local Centres)

Policy C1	• Whether the Plan's hierarchy of centres is sufficiently defined • Whether the policy provides sufficient protection for the designated centres
Soundness Test(s)	• Positively Prepared • Justified • Effective • Consistent with National Policy

2.1 WOA are in broad agreement with the hierarchy of centres defined in the Plan. However, the city centre should be differentiated from the District Centres as the highest order centre in the hierarchy.

2.2 WOA are generally supportive of the 'town-centre' first approach. However, it is unclear from the fifth bullet on page 2 of Chapter 7 whether the plan is setting a sequential priority for the city centre followed by the district centres, local centres, edge of centre and then out of centre.

2.3 The presumption in favour of the full range of Class E uses within centres identified in the hierarchy is supported. The imperative for flexibility for units comprising a centre to change between the widest range of uses has never been greater under the extremely challenging retail and leisure market circumstances that continues to be impacted by the recent world events (Covid 19 Pandemic / Brexit / cost of living crisis / War in Ukraine / Middle East conflict) and the exponential rise in online competition.

2.4 WOA endorses the need for compatibility with other policies in the Plan, and in particular the contribution of investment in high quality public realm to sustaining city centre vitality and viability. Through draft Policies S2 (High Quality Design) and HD1 (Principles of High

Quality Design) the Council is urged to establish a proactive approach to delivering investment in new and upgraded public realm throughout the city centre. Such investment should include improved wayfinding and directional signage from Oxford Central Station to key town centre amenities, and enhanced connectivity between key spaces, including the pedestrianisation of Queen Street.

2.5 Provisions should also be included for securing contributions from appropriate out-of-centre developments to enhance the robustness of the city centre against out-of-centre competition, particularly where the latter is preferentially located in terms of accessibility by private cars and / or with dedicated car parking and / or not subject to the congestion charge.

2.6 Where out of centre development is proposed, the implications of its comparative accessibility by non-sustainable modes of transport, particularly in locations that have an additional competitive advantage due to freedom from the congestion charge that affects more central locations, should be included as a policy criterion and reflected in the assessment of its impacts on the city centre. Accessibility to the city centre is poor, and the introduction of the congestion charge has accentuated its disadvantages relative to more peripheral locations. If a higher level of dedicated parking provision is deemed necessary than for equivalent uses in the city centre, then this should be identified as a conflict with Draft Policy C8 (Motor Vehicle Parking Design Standards) since it confers competitive advantage on such locations, particularly those that are outside the congestion charge zone, and would be contrary to the sustainable transport objectives of the Plan. As such, it will require a commensurately higher level of public benefits in the overall planning balance to outweigh the policy conflict.

2.7 The policy framework should also provide for contributions to be made to enhancements to the city centre public realm where out-of-centre developments are to be approved to reinforce the robustness of the city centre against out-of-centre competition.

2.8 The requirement for retail impact assessment for proposals for out-of-centre developments exceeding 350m^2 should be justified in the Plan given the default threshold of 2,500m^2 in the NPPF. It is assumed to reflect to the oversupply of retail and leisure floorspace in the city, as evidenced through widespread repurposing of such floorspace in the city centre, and endorsed by the evidence base[1]. This needs to be clearly stated in the Plan.

[1] Stantec, Oxford Retail, Leisure and Town Centre Needs Study, June 2023

2.9 WOA would caution against limiting the flexibility to change between uses within Class E, if that is what is foreshadowed in bullet 4 on page 4, which would be contrary to the Government's intentions through the Use Classes Order and permitted development regime, and prejudicial to the commercial imperative to be able to respond to rapid changes in the retail and leisure industries as foreshadowed in the NPPF[2]. It is unclear how setting thresholds above the current levels of Use Class E will be effective since the Council has no power to increase the proportion to the minimum threshold level.

Changes Sought	
Policy C1	• Clearer definition of the retail hierarchy, with the City Centre differentiated as the top tier. • Reinforcement of the provisions for resisting out of centre development which would have a comparative trading advantage due to the availability of dedicated and proximal car parking and freedom from the congestion charge and/or supporting the city centre through contributions to public realm enhancements where out-of-centre developments are approved.

Policy C2 (Maintaining Vibrant Centres)

Issue	• Whether the provisions of the Plan are sufficient to support vibrant centres
Soundness Test(s)	• Positively prepared • Justified • Effective • Consistent with National Policy

[2] NPPF, para. 90(a)

2.10 WOA supports the encouragement of densification and growth in the city centre.

2.11 The policy requirements set out in criteria a) – l) should only apply where 'relevant and justified by the development proposed'. It should be confirmed that out-of-centre developments will be required to contribute to criterion f) through Section 106 Obligations.

2.12 The threshold for the % of class E uses in the primary and secondary frontages will need to be clearly justified. Retention of existing thresholds that are a snapshot of current trading profile, operator representation and market circumstances may not facilitate the essential and rapid response to dynamic retail and leisure markets and could impact negatively on the longer term vitality and sustainability of centres. Again, the ongoing repurposing of class E floorspace within the city centre for non-class E purposes is evidence of over-supply, and makes an important contribution to its overall vitality and viability and maintaining investment that protects against its physical decline. This, in turn, supports other policy objectives, and in particular to protect and enhance heritage assets and their settings. The planning permission granted for the redevelopment of the Clarendon Centre is a manifestation of this essential process of change and renewal, and which is held in the evidence base to be 'transformative' of a prominent site[3].

2.13 The vitality and viability of the city centre will be best served by a consolidation of retail floorspace together with a clear strategy for public realm enhancements to which out-of-centre developments should contribute. Additional, new build retail floorspace will simply compete for existing tenants and poses a risk to the efficient use of existing capacity. Moreover, the provision of floorspace for food and drink establishments (Class E(b)) is at saturation point. Therefore, the threshold for the % of class E uses should not preclude further transitioning of parts of the centre away from such uses where alternative uses are an imperative to avoid stagnation and decline.

Changes Sought	
Policy C2	• Amend the policy to confirm that the development criteria will be applied flexibly and only where justified by the development proposed.

[3] Ibid, para. 1.18, second bullet

	• Confirm that out-of-centre developments will be expected to contribute to city centre public realm enhancements. • Confirm the justification for a threshold % of Class E uses which represent a snapshot of a moment in time and risk restricting the ability to respond to the dynamics of the retail market and commercial imperatives.

Policy C8 (Motor Vehicle Parking Design Standards)

Issue	• Whether the provisions are consistent for all developments
Soundness Test(s)	• Positively Prepared • Justified • Effective

2.14 See paragraph 2.6 in response to Policy C1 above. Draft Policy C8 should include a presumption against out-of-centre developments that are not in accordance with an up-to-date Development Plan for purposes within Class E that would require other than operational and accessible parking. The evidence of the retail study supports a 'strong stance' regarding out-of-centre development.

2.15 To be consistent with the objective to sustain and enhance the vitality and viability of town centres, out-of-centre developments should not be afforded comparative advantage by benefitting from dedicated, surface level car parking, accentuated by freedom from the congestion charge.

Changes Sought	
Policy C8	• Amend the wording of the reasoned justification to confirm that, in the case of out-of-centre development for town centre uses (Class E), no dedicated parking, except for operational and accessible

	purposes, will be permitted, and it will be considered to be in conflict with Policy C8 if the transport assessment indicates that dedicated parking would be necessary to make the transport impacts of the proposed development acceptable.

Policy I1 (Digital Infrastructure to Support New Development)

Issue	• Whether the policy provides a satisfactory framework for supporting all digital infrastructure needs and requirements
Soundness Test(s)	• Positively Prepared • Justified • Effective • Consistent with National Policy

2.16 This policy is too narrowly focused on broadband and data centres associated with new developments. The policy framework in the Plan should be broadened to provide support for the full range of contemporary digital infrastructure requirements, including digital screens associated with existing developments, which are essential to sustaining the vitality of contemporary city centres and ensuring inclusivity and equality.

2.17 As evidenced through recent planning applications in the city centre, there is pressure for the installation of such technology, many in inappropriate locations, which is likely to escalate. A policy approach, with identification of opportunities in key locations for the installation of digital screens working collaboratively with key city centre stakeholders, such as WOA, will ensure that such pressures are managed and this essential infrastructure can be delivered in an appropriate and coordinated manner to support the needs of existing investors and key stakeholders.

Changes Sought	
Policy I1	• Amend the policy to provide express support for the installation of

	digital screens to meet the requirements of key stakeholders in the city centre and other appropriate locations

Policy G5 (Delivering Onsite Ecological Enhancements)

Issue	• Whether the requirements of this policy are onerous, particularly in relation to minor commercial developments
Soundness Test(s)	• Positively Prepared • Justified • Effective • Consistent with National Policy

2.18 The requirement to deliver ecological enhancements associated with 'all' new development is onerous and unnecessary. Moreover, it exceeds the statutory requirements. On its face, it would require changes of use and minor works such as shopfront replacements to deliver onsite ecological enhancements, that would be neither reasonable nor practical to provide.

Changes Sought	
Policy G5	• Amend the policy to exclude minor commercial developments

Policy HD1 (Principles of High Quality Design)

Issue	• Whether the policy provisions are proportionate to the scale and nature of development proposed
Soundness Test(s)	• Positively Prepared • Justified • Effective • Consistent with National Policy

2.19 The categories of development that are excluded from the requirements to be supported by a constraints and opportunities plan with supporting text and/or visuals to explain their design rationale, is too limited. They should be extended to exclude minor commercial developments which will have limited impacts on their context and do not need to be burdened by such requirements.

Changes Sought	
Policy HD1	• Amend the policy to include minor commercial developments amongst the categories that are excluded from the requirement to be supported by material to explain their design rationale which would be consistent with the proportionate approach intended by the policy.

Policy E5 (Hotel and Short Stay Accommodation)

Issue	• Whether this policy is inconsistent with national policy aimed at ensuring the vitality of town centres
Soundness Test(s)	• Justified • Effective • Consistent with National Policy

2.20 National planning policy requires main town centre uses to be located in town centres, then in edge of centre locations. Only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered[4] Hotels are identified as 'main town centre uses'[5].

[4] NPPF, para. 91
[5] Ibid, Glossary, p.75

2.21 Policy E5 is therefore inconsistent with national policy since it does not set out a sequential approach that affords priority to city centre locations, and only on out-of-centre sites where it has been demonstrated that suitable within- or edge-of-centre sites are not available. The evidence base has not applied a sequential test to confirm that out-of-centre sites, along the main arterial roads, are required.

Changes Sought	
Policy E5	• Delete criterion d) from the policy • Include additional wording to confirm that proposals on out-of-centre sites on Oxford's main arterial roads will be considered favourably only where it has been demonstrated, through a sequential test, that suitable sites are not available within existing centres or edge-of-centre locations • The reasoned justification should confirm that dedicated car parking will be restricted to provision for operational and accessible purposes only

Chapter 8 (Site Allocations)

Issue	• Whether the site allocations that include provisions for town centre uses are appropriate and justified
Soundness Test(s)	• Positively Prepared • Justified • Effective • Consistent with National Policy

2.22 A significant number of the site allocations that are made in the Plan include provision for town centre uses. In particular:

- SPN1 (Diamond Place and Evans House)
- SPS16 (Templars Square)
- SPE1 (Churchill Hospital)
- SPE5 (John Radcliffe Hospital)
- SPE16 (Thornhill Park, Phase 2)
- SPCW2 (Botley Road Sites)
- SPCW7 (Nuffield Sites)
- SPCW9 (Oxford Railway Station and Becket Street Car Park)
- SPCW10 (Oxpens)

2.23 None of the allocations that include town centre uses specify the floorspace quanta for those uses that it is anticipated will be delivered on the respective sites. Moreover, there is no evidence that the potential impacts, including cumulative impacts, on the city centre and other designated centres, have been assessed, nor has the sequential approach been applied.

2.24 In addition to the above provisions, the majority of allocations for non-town centre uses also specify 'other complimentary uses will be considered on their merits'. This provision could be used to justify town centre uses if they are deemed to be complimentary, for example to residential and employment uses, and the cumulative floorspace quanta arising from which could be considerable.

2.25 The 2023 needs study[6] indicated a very precarious position for town centre uses:

> *Most developers are building less retail floorspace, in line with reducing operator demand. Existing retail floorspace is being converted into alternative uses and the COVID-19 pandemic has accelerated a number of trends within the retail and leisure markets. Brexit-related uncertainty remains in some parts of the economy and the ongoing Russia-Ukraine conflict has resulted in high inflation, low growth and supply chain disruptions. The cost-of-living crisis has had a negative impact on retail sales. The retail market has experienced a significant decrease in rents although there are signs that rents in some stronger locations are stabilising. Regarding the convenience retail market, the 'Big Four' concept is outdated with Aldi now*

[6] Oxford Retail, Leisure and Town Centre Needs Study, Main Report, Stantec, June 2023

accounting for the same proportion of the UK grocery share as Morrisons. There has been a significant reduction in average weekly household spending across all leisure sub-sectors (a result of repeated lockdowns).[7]

2.26 Within this context, the 2023 study identified a negative requirement for additional comparison retail sales area floorspace in the period to 2033, and only a limited positive requirement over the longer term period to 2042[8]. Moreover, the study found there to be no quantitative requirement for new convenience retail floorspace during the entirety of the period to 2042[9].

2.27 Whilst the October 2025 needs study update portrays a slightly more positive outlook[10], it has already been superseded by real world events that could further destabilise already precarious and volatile market circumstances. In particular, the ongoing and escalating conflict in the Middle East is, once again, threatening to destabilise the World economy and to fuel inflation with oil and gas prices escalating exponentially, and the recent downward trend in mortgage rates indicating signs of reversal. It has the potential to impact significantly on the future economic outlook and consumer confidence, and in the context of UK economic growth unexpectedly flatlining in January 2026 in the recently published figures[11].

2.28 Against this backdrop, it is imperative to apply the precautionary principle to the provision of new floorspace for town centre uses to protect the investment in existing assets. Since there is no, or very limited, need for additional floorspace in the period to 2033, and therefore beyond the five year time period within which the current Plan will need to be reviewed, then it would be prudent to postpone provision for any new floorspace until the time of that review.

2.29 The current evidence is that there is an over-provision of floorspace in town centre uses within the city, as reflected in current initiatives to reduce it through, for example, the repurposing of the Clarendon Centre. The process of adjusting to the recent events that are acknowledged in the 2023 needs study and cited above is ongoing. The even more recent events that post-date both the 2023 and 2025 needs studies pose further shocks and threats to the already precarious and volatile market circumstances. The planning policy provisions

[7] Ibid, para. 1.1.2
[8] Ibid, para. 1.1.6
[9] Ibid
[10] Oxford Retail, Leisure and Town Cnetre Needs Study Update, Rapleys, October 2025
[11] ONS, 13 March 2026

should therefore respond accordingly with a precautionary approach unless and until there is clear evidence of a positive long term outlook.

Changes Sought	
Chapter 8	• Review the allocations that make specific provision for town centre uses, and consider their removal; • Where specific provision is to be retained, identify a maximum floorspace quanta that has been subject to robust impact assessment and sequential testing; • Introduce clarification within Chapter 8 to confirm that the 'other complimentary uses' considered appropriate within the site allocations policies will not normally include town centre uses, and which will be subject to the impact and sequential tests set out in Policy C1.


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