

1 DEFINITION OF SHOPPING FRONTAGES & BOUNDARIES

1.1 This Appendix reviews and provides recommendations on the most appropriate definition of Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs), and Primary Shopping Areas (PSAs) in Oxford City Council. This has been carried out in accordance with the advice set out in the NPPF.

POLICY CONTEXT

1.2 In setting out policies for the management and growth of centres over the plan period, and promoting competitive town centre environments, local planning authorities are required by the NPPF (paragraph 23) to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.

1.3 The NPPF (Annex 2) defines primary and secondary frontages as follows:

- **Primary Shopping Frontages (PSFs)** - likely to include a high proportion of retail uses, which may include food, drinks, clothing and household goods.
- **Secondary Shopping Frontages (SSFs)** - provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

1.4 The difference between the definition of the Primary Shopping Area and Town Centre Boundary is defined by NPPF (Annex 2) as follows:

- **Primary Shopping Area (PSA)** - the area where retail development is concentrated and generally comprises the PSFs and those SSFs which are “adjoining and closely related to the primary shopping frontage”.
- **Town Centre Boundary (TCB)** – defined as the area on the local authority’s proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

1.5 The definition of a centre’s PSA and TCB is important in retail planning terms in a number of important respects:

- First, for the purposes of plan-making and development management, sites and applications for new retail, leisure and other main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan will be subject to the sequential and impact ‘tests’ in accordance with the NPPF (paragraphs 24-27).
- Second, in terms of applying the sequential approach for both plan-making and decision-taking, an ‘edge-of-centre’ site is defined for retail purposes by the NPPF (Annex 2) as a location that is “well connected and up to 300 metres of the primary shopping area”. For all other main town centre uses it is a location “within 300 metres of a town centre boundary”; and for office development, it includes “locations outside the town centre but within 500 metres of a public transport interchange”. The NPPF states that in determining whether a site falls within the definition of edge of centre, “account should be taken of local circumstances”, and preference should be given to “accessible sites that are well connected to the town centre” (NPPF, paragraph 24).
- Third, defining the extent of the PSF and PSA for town centres will also enable local planning authorities to manage Permitted Development Rights (PDR), principally from retail to residential use.

1.6 It is against this policy background and guidance that we have necessarily reviewed and identified the extent of each centre’s primary and secondary shopping frontages, PSA and Town Centre Boundaries. Our assessment has been based on the robust evidence provided by Oxford City Council, including audits detailing the current mix of Class A uses in each of the main centres on a street-by-street basis. This has been further supplemented by our health checks and site visits of the main centres during 2016.

Existing Frontage Policies

1.7 As highlighted in **Section 2** of this report, the current Development Plan contains a number of policies that are relevant to frontages.

Table 1: Current Frontage Policies

Policy Reference:	
Policy CS1 ‘Hierarchy of Centres’	<p>Defines the Oxford’s hierarchy of centres as follows:</p> <ol style="list-style-type: none"> 1. City centre 2. Primary district centre (Cowley centre) 3. District centres (Blackbird Leys, Cowley Road, Headington and Summertown) 4. Neighbourhood centres <p>The city centre and district centres are defined on the Policies Map 2013 (formerly known as the Proposals Map).</p>
Policy WE23: Retail	<p>Refers to the Primary Shopping Area for Oxford Centre, which is defined on the Policies Map 2013. It states that planning permission will be granted for new retail floorspace within the Primary Shopping Area. Outside the Primary Shopping Area, planning permission will not be granted for additional retail floorspace except for small-scale local shops, facilities ancillary to cultural attractions such as galleries and new interactive museums, or facilities that enhance the cultural offer in their own right. Planning permission will only be granted for a small amount of new convenience (food) retail use in the West End if it does not exceed Oxford’s total additional need, and only if it is in the Primary Shopping Area.</p>
Policy RC.3 ‘Primary Shopping Frontage’	<p>States that within the Oxford City Centre PSF, permission will only be granted for:</p> <ol style="list-style-type: none"> a) Class A1 (shop) uses; b) Class A2 (financial and professional) uses where the proportion of units at ground (or main pedestrian entry) level in A1 use does not fall below 80% of the total number of units; c) Class A3-A5 (food and drink) uses where the proportion of units at ground (or main pedestrian entry) level in A1 use does not fall below 75% of the total units.
Policy RC.4 ‘District Shopping Frontages’	<p>States that “within the District Shopping Frontage, planning permission will only be granted for:</p> <ol style="list-style-type: none"> a) Class A1 (shop) uses b) Other Class A uses only where the proportion of units at ground level in A1 use does not fall below 65% of the total ground level units in the centre; and c) Other uses only where the proportion of units at ground level in Class A use does not fall below 95% of the total ground level units in the centre”.
Policy RC.5 ‘Secondary Shopping Frontage’	<p>States that “within the Secondary Shopping Frontage, planning permission will only be granted for:</p> <ol style="list-style-type: none"> a) Class A1 (shop) uses; b) Other Class A uses only where the proportion of units at ground floor level in A1 use does not fall below 50% of total units; and c) Other uses only where the proportion of units at ground level in Class A uses does not fall below 95% of the total units in that frontage”.

<p>Policy RC.6 Street Specific Controls</p>	<p>States that “planning permission will be granted within the following streets for Class A1 uses. Other Class A uses will only be granted planning permission subject to the following criteria:</p> <p>a) High Street east area: Class A1 (shop) uses not falling below 70% of the total number of ground floor units;</p> <p>b)The Little Clarendon Street area: the level of Class A1 (shop) uses not falling below 65% of the total number of ground floor units;</p> <p>c) The Walton Street area: the level of Class A1 (shop) uses not falling below 50% of the total number of ground floor units; and</p> <p>d) Park End Street and Hythe Bridge Street area: the level of Class A1 (shop) uses not falling below 35% of the total number of ground floor units.” It is noted that Park End Street and Hythe Bridge Street area are not displayed on The Policies Map 2013.</p>
<p>Policy RC.7 ‘Covered Market’</p>	<p>States that “within the Covered Market, planning permission will only be granted for:</p> <p>a) Class 1 (shop) uses; and</p> <p>b) Class A3-5 (food and drink) uses where the proportion of units at ground floor level in A1 use does not fall below 80% of total units”.</p>
<p>Policy RC.8 ‘Neighbourhood Shopping Centres’</p>	<p>States that “planning permission will only be granted for the loss of a Class A1 (shop) use in Neighbourhood Shopping centres when:</p> <p>a)Evidence of a lack of viability is demonstrated to support a change of use;</p> <p>b)The proportion of units at ground floor level in A1 retail use does not fall below 50% of the total units in the neighbourhood shopping centres;</p> <p>c)Non-residential uses such as other commercial or community uses will be considered on their individual merits and their added value in providing additional local facilities; and</p> <p>d)Changes of use to residential use are supported with substantial proof that commercial or community uses are not viable”.</p>
<p>Policy RC.18 ‘Public Houses’</p>	<p>States that “Planning permission will only be granted for the change of use of a public house if one or more of the following criteria are met:</p> <p>a) No other potential occupier can be found following a realistic effort to market the premises for its existing use;</p> <p>b) Substantial evidence of non-viability is submitted; and</p> <p>c) It is demonstrated that suitable alternative public houses exist to meet the needs of the local community”</p>
<p>The Policies Map 2013</p>	<p>Displays: Oxford City Centre’s Primary Shopping Area (Policy WE23), Primary Shopping Frontage (Policy RC.3), Secondary Shopping Frontage (RC.5) and Street Specific Shopping Frontages (Policy RC.6)</p> <p>Cowley Primary District Centre boundary (Policy CS1) and the District Shopping Frontage (Policy RC.4). There are no defined Secondary Shopping Frontages.</p> <p>Cowley Road District Centre boundary (Policy CS1), District Shopping Frontages (Policy RC.4) and Secondary Shopping Frontages that are located adjacent to the District Centre.</p> <p>Headington District Centre boundary (Policy CS1) and District Shopping Frontages (Policy RC.4).</p> <p>Summertown District Centre boundary (Policy CS1) and District Shopping Frontages (Policy RC.4).</p> <p>Little Clarendon Street in Oxford, Sections of High Street (east area) in Oxford; Walton Street area, controlled by Policy RC.6 - Street Specific Controls.</p>

Oxford City Centre

- 1.8 The Policies Map 2013 displays Oxford City Centre’s Primary Shopping Area (Policy WE23), Primary Shopping Frontage (Policy RC.3), Secondary Shopping Frontage (RC.5) and Street Specific Shopping Frontages (Policy RC.6)
- 1.9 In July 2015 the Council undertaken a survey of Class A Use Class premises within Primary Shopping Frontages and Secondary Shopping Frontages, compared to the total composition. The results are summarised in the tables below.

Table 2: Oxford Centre' Primary Frontages breakdown of Class A premises.

LOCATION	Total Number of Units	A1 USE	A2 USE	A3 USE	A4 USE	A5 USE	A1/A3 USE	SUI/ GEN	
Broad Street	2	100%	0%	0%	0%	0%	0%	0%	
Magdalen Street	7	100%	0%	0%	0%	0%	0%	0%	
Shoe Lane	1	100%	0%	0%	0%	0%	0%	0%	
Clarendon Centre	22	95%	0%	5%	0%	0%	0%	0%	
Queen Street	20	90%	5%	5%	0%	0%	0%	0%	
New Inn Hall Street	11	82%	9%	9%	0%	0%	0%	0%	
Cornmarket Street	40	78%	13%	0%	0%	8%	3%	0%	
High Street	37	70%	19%	5%	3%	0%	3%	0%	
The Golden Cross Cornmarket St.	13	69%	8%	23%	0%	0%	0%	0%	
George Street	19	37%	11%	32%	16%	0%	0%	5%	
Carfax	2	0%	50%	50%	0%	0%	0%	0%	
St. Ebbe's Street	0	0%	0%	0%	0%	0%	0%	0%	
Westgate Centre	Under Reconstruction								
TOTAL	174	75%	10%	9%	2%	2%	1%	0%	1%

Source: Oxford City Council, Adopted Oxford Local Plan Shopping Policy RC 3 (Primary Frontage) Survey Date July 2015

1.10 Policy RC.3 'Primary Shopping Frontage' states that permission for Class A2 (financial and professional) uses and Class A3-A5 (food and drink) will only be granted where the number of A1 units does not fall under 80% and 75% respectively. Whilst the policy is based on measuring the percentage of A1 units in relation to the total number of units in the Primary Shopping Frontage (PSF), it is clear from the analysis above that High Street, The Golden Cross Cornmarket St, George Street, Carfax and St. Ebbe's Street would fall below the set thresholds.

Table 3: Oxford Centre: Secondary Frontages breakdown of Class A premises.

LOCATION	Total Number of Units	A1 USE	A2 USE	A3 USE	A4 USE	A5 USE	SUI/GEN A1/A3 USE	B1 USE	C1 USE	D1 USE	D2 USE	SUI/GEN	
Ship Street	2	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Turl Street	14	86%	7%	0%	0%	0%	0%	0%	0%	0%	0%	7%	
Broad Street	20	80%	5%	5%	5%	0%	5%	0%	0%	0%	0%	0%	
Market Street	5	80%	0%	20%	0%	0%	0%	0%	0%	0%	0%	0%	
New Road	5	60%	20%	0%	20%	0%	0%	0%	0%	0%	0%	0%	
St. Ebbes	11	55%	18%	0%	18%	0%	0%	0%	0%	0%	9%	0%	
Gloucester Green	13	54%	0%	38%	0%	0%	8%	0%	0%	0%	0%	0%	
St. Aldates	15	47%	27%	0%	13%	0%	0%	0%	0%	7%	0%	7%	
New Inn Hall Street	5	40%	0%	20%	0%	0%	0%	0%	0%	20%	0%	20%	
Gloucester Street	3	33%	0%	0%	33%	0%	0%	0%	0%	0%	0%	33%	
St. Michael's Street	13	23%	0%	38%	8%	0%	0%	0%	8%	8%	0%	15%	
George Street	14	14%	0%	57%	14%	0%	0%	0%	0%	0%	7%	7%	
Castle Street	2	0%	0%	50%	50%	0%	0%	0%	0%	0%	0%	0%	
Friar's Entry	3	0%	0%	33%	67%	0%	0%	0%	0%	0%	0%	0%	
King Edward Street	2	0%	0%	50%	50%	0%	0%	0%	0%	0%	0%	0%	
Pennyfarthing Place	1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	
St. George's Place	4	0%	0%	50%	0%	25%	0%	0%	0%	0%	0%	25%	
TOTAL	132	49.24%	6.82%	19.70%	10.61%	0.76%	1.52%	0.00%	0.76%	2.27%	1.52%	6.82%	
Class A		89%											

Source: Oxford City Council, Adopted Oxford Local Plan 2001-2016 Shopping Policy RC 5 City Centre Secondary Area Survey
Date July 2015

1.11 Policy RC.5 'Secondary Shopping Frontage' states that permission for Class A uses other than A1 would be granted where the proportion of units at ground floor level in A1 use does not fall below 50% of total unit; and for other (i.e. non Class A) uses only where the proportion of units at ground level in Class A uses does not fall below 95% of the total units in that frontage. Whilst the policy is based on measuring the percentage of A1 units in relation to the total number of units in the Secondary Shopping Frontage (SSF), it is clear from the analysis above that the majority of SSF streets contains less than 50% of A1 units, and hence would fall below the set thresholds. Additionally the Class A units currently make up 89% of all the units, falling below the threshold.

Street Specific Controls

1.12 Policy RC.6 - Street Specific Controls sets frontage policies for Little Clarendon Street, Sections of High Street (east area), Walton Street area, Park End Street and Hythe Bridge Street area, all of which are located in close proximity to Oxford's Primary Shopping Area. In January 2016, the Council undertook a survey of Use Class composition within these streets. The results are presented in the tables below, against the current policy threshold.

Table 4: Street Specific Controls

Little Clarendon Street Area							
Use Class	A1	A2	A3 - A5	Mix of Class A uses	Class A Total	Other Uses	Totals
No. of units	32	4	12	0	48	0	48
Percentage	67%	8%	25%	0%	100%	0%	100%
Policy RC.6 -A1 minimum threshold for allowing other Class Uses	65%						
High Street Area							
Use Class	A1	A2	A3 - A5	Mix of Class A uses	Class A Total	Other Uses	Totals
No. of units	34	1	6	1	42	1	43
Percentage	79%	2%	14%	2%	98%	2%	100%
Policy RC.6 -A1 minimum threshold for allowing other Class Uses	70%						
Walton Street Area							
Use Class	A1	A2	A3 - A5	Mix of Class A uses	Class A Total	Other Uses	Totals
No. of units	16	5	14	0	35	2	37
Percentage	43%	14%	38%	0%	95%	5%	100%
Policy RC.6 -A1 minimum threshold for allowing other Class Uses	50%						

1.13 It is noted that whilst Policy RC.6 applies to Park End Street and Hythe Bridge Street area, stating that the level of Class A1 (shop) uses should not falling below 35% of the total number of ground floor units, these frontages are not displayed on the Policies Map 2013 and have not been surveyed by the Council for Use Class composition. As such, we are unable to comment on their composition.

Covered Market

1.14 The Policies Map 2013 displays Covered Market in Oxford City Centre, and Policy RC.7 ‘Covered Market’ states that “within the Covered Market, planning permission will only be granted for: Class A1 (shop) uses; and Class A3-5 (food and drink) uses where the proportion of units at ground floor level in A1 use does not fall below 80% of total units. In July 2015 the Council undertook a survey of Use Classes present at the Market. This is summarised in the table below.

Table 5: Covered Market: Use Classes Analysis

Use Class	Number of Units	Percentage
A1	51	88%
A3	6	10%
A5	1	2%
Total	58	100%

Source: Adopted Oxford Local Plan 2001-2016
Shopping Policy RC7 Oxford Covered Market City Centre July 2015

Cowley Primary District Centre

1.15 The Policies Map 2013 displays Cowley Primary District Centre boundary (Policy CS1) and the District Shopping Frontage (Policy RC.4) which are concentrated within the Templars Square Shopping Centre and the adjacent Templars Shopping Park. There are no defined Secondary Shopping Frontages.

1.16 In July 2015 the Council undertook a survey of Class A Use Class premises within the District Shopping Frontage, compared to the total composition. The results are summarised in the table below.

Table 6: Cowley District Shopping Frontage Composition

LOCATION	Total Number of Units	A1 USE	A2 USE	A3 USE	A4 USE	A5 USE	SUI/GEN A1/A3	B1 USE	D1 USE	D2	SUIGEN	
The Square	21	95%	0%	5%	0%	0%	0%	0%	0%	0%	0%	
Pound Way	22	91%	0%	0%	0%	0%	0%	5%	5%	0%	0%	
Templars Shopping Park	12	83%	0%	8%	0%	0%	0%	0%	0%	8%	0%	
Upper Barr	17	76%	0%	12%	0%	0%	0%	0%	0%	0%	12%	
Barns Road	6	33%	17%	0%	0%	0%	0%	0%	0%	0%	50%	
Between Towns Road	11	18%	27%	0%	18%	36%	0%	0%	0%	0%	0%	
Bank Court	4	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	
TOTAL	93	72%	9%	4%	2%	4%	0%	1%	1%	1%	5%	
Class A		91%										

Source: Adopted Local Plan 2001-2016 Shopping Policy RC 4 Templars Square Survey July 2015

1.17 Policy RC.4 'District Shopping Frontages' states that permission for Class A uses other than A1 would be granted where the proportion of units at ground floor level in A1 use does not fall below 65% of total unit; and for other (i.e. non Class A) uses only where the proportion of units at ground level in Class A use does not fall below 95% of the total units in that frontage.

Cowley Road District Centre

1.18 The Policies Map 2013 displays the Cowley Road District Centre boundary (Policy CS1), District Shopping Frontages (Policy RC.4) and Secondary Shopping Frontages that are located adjacent to the District Centre.

1.19 In July 2015 the Council undertook a survey of Use Classes within the District Shopping Frontage, and of the adjacent Secondary Shopping Frontages. The tables below summarise the results compared to the total composition.

Table 7: Cowley Road District Shopping Frontage composition

LOCATION	Total Number of Units	A1 USE	A2 USE	A3 USE	A4 USE	A5 USE	SUI/GEN A1/A3	B1 USE	SUI/GEN
COWLEY ROAD	53	58%	9%	13%	8%	6%	0%	0%	6%
Class A		94%							

Source: Adopted Oxford Local Plan 2001 - 2016 Shopping Policy RC 4 District Shopping Frontage for Cowley Road Survey Date July 2015

1.20 Policy RC.4 'District Shopping Frontages' states that permission for Class A Uses other than A1 would be granted where the proportion of units at ground floor level in A1 use does not fall below 65% of total unit; and for other (i.e. non Class A) uses only where the proportion of units at ground level in Class A use does not fall below 95% of the total units in that frontage. Whilst the policy is based on measuring the percentage of A1 units in relation to the total number of units in the District Shopping Frontage, it is clear from the analysis above that Cowley Road falls below the set thresholds at the moment. Additionally the percentage of Class A units also falls below the set threshold with 94%.

Table 8: Cowley Road adjacent Secondary Shopping Frontages composition

LOCATION	Total Number of Units	A1 USE	A2 USE	A3 USE	A4 USE	A5 USE	SUI/GEN A1/A3	B1 USE	C1 USE	D1 USE	SUI/GEN
COWLEY ROAD	105	51%	7%	25%	3%	10%	2%	0%	0%	2%	1%
THE PLAIN	2	50%	50%	0%	0%	0%	0%	0%	0%	0%	0%
ST. CLEMENTS'	44	48%	16%	9%	9%	5%	0%	0%	5%	7%	2%
TOTAL	151	50%	10%	20%	5%	8%	1%	0%	1%	3%	1%
Class A		94%									

Source: Adopted Oxford Local Plan Shopping Policy RC5 Secondary Shopping Frontage July 2015 **Checked In Uniform **

1.21 As Policy RC.5 'Secondary Shopping Frontage' states that permission for Class A uses other than A1 would be granted where the proportion of units at ground floor level in A1 use does not fall below 50% of total unit; and for other (i.e. non Class A) uses only where the proportion of units at ground level in Class A use does not fall below 95% of the total units in that frontage. Whilst the policy is based on measuring the percentage of A1 units in relation to the total number of units in the Secondary Shopping Frontage (SSF), it is clear from the analysis above that the secondary shopping frontages are currently at about 50% which is in line with the set thresholds for Class A uses other than A1, and slightly below the Class A threshold (i.e. 94% compared with 95% in Policy RC.5)

Headington District Centre

1.22 The Policies Map 2013 displays Headington District Centre boundary (Policy CS1) and District Shopping Frontages (Policy RC.4). There are no secondary frontage in Headington District Centre, or adjacent to it.

1.23 In July 2015 the Council undertook a survey of Use Class composition within the District Shopping Frontage. The table below summarises the results compared to the total composition.

Table 9: Headington District Centre Class Composition

LOCATION	Total Number of Units	A1	A2	A3	A4	A5	SUI/GEN A1/A3	B1	C1	SUI GEN
Windmill Road	23	78%	9%	9%	0%	0%	0%	0%	0%	4%
Old High Street	5	60%	0%	0%	0%	0%	40%	0%	0%	0%
London Road	82	59%	18%	6%	2%	4%	2%	1%	1%	6%
Osler Road	2	50%	0%	0%	50%	0%	0%	0%	0%	0%
TOTAL	112	63%	15%	6%	3%	3%	4%	1%	1%	5%
Class A		93%								

Source: Adopted Local Plan 2001 - 2016 Shopping Policy RC4 Headington Survey

1.24 Policy RC.4 'District Shopping Frontages' states that permission for Class A uses other than A1 would be granted where the proportion of units at ground floor level in A1 use does not fall below 65% of total unit; and for other (i.e. non Class A) uses only where the proportion of units at ground level in Class A use does not fall below 95% of the total units in that frontage. Whilst the policy is based on measuring the percentage of A1 units in relation to the total number of units in the District Shopping Frontage, it is clear from the analysis above that Headington falls below the set thresholds at the moment. Additionally the percentage of Class A units also falls below the set threshold with 93%.

Summertown District Centre

1.25 The Policies Map 2013 displays Summertown District Centre boundary (Policy CS1) and District Shopping Frontages (Policy RC.4). There are no secondary frontages in Summertown District Centre, or adjacent to it.

1.26 In July 2015 the Council undertook a survey of Use Class composition within the District Shopping Frontage. The table below summarises the results compared to the total composition.

Table 10: Summertown District Centre Class Composition

LOCATION	Total Number of Units	A1 USE	A2 USE	A3 USE	A4 USE	A5 USE	SUI/GEN A1/A3	D1 USE	SUI GEN
Banbury Road	79	63%	24%	6%	1%	0%	3%	1%	1%
South Parade	19	58%	11%	16%	5%	5%	0%	0%	5%
Oakthorpe Road	2	100%	0%	0%	0%	0%	0%	0%	0%
TOTAL	100	63%	21%	8%	2%	1%	2%	1%	2%
Class A		97%							

Source: Adopted Oxford Local Plan 2001 - 2016 Shopping Policy RC 4 Summertown Vacant Units Survey Date July 2015

1.27 Policy RC.4 'District Shopping Frontages' states that permission for Class A uses other than A1 would be granted where the proportion of units at ground floor level in A1 use does not fall below 65% of total unit; and for other (i.e. non Class A) uses only where the proportion of units at ground level in Class A use does not fall below 95% of the total units in that frontage.

Blackbird Leys District Centre

The Policies Map 2013 displays Blackbird Leys District Centre boundary (Policy CS1), however no PSF or SSF are defined and hence there no corresponding policies on frontages. It is noted that retail uses are concentrated on Blackbird Lays Road. The Council has not undertaken a survey of the centre recently.

FRONTAGE POLICIES TRENDS

1.28 To inform this Study we have reviewed the Development Plan Documents that have been adopted by other Local Planning Authorities in 2015 and 2016. This was done in order to understand how frontage policies are dealt with by others and to establish general trends for dealing with this matter. The following Local Plan Documents have been found particularly useful as part of the exercise, reflecting a variety of types of frontage policies:

- Chorley Local Plan 2012-2026 Site Allocations and Development Management Policies Development Plan Document, adopted in July 2016.
- Tunbridge Wells Borough Site Allocations Local Plan, adopted in July 2016
- Hinckley and Bosworth Borough Council Local Plan 2006 – 2026 Site Allocations and Development Management Policies DPD, adopted in July 2016.
- North Somerset Council Development Management Policies Sites and Policies Plan Part 1, adopted in July 2016.
- Fareham Local Plan Part 2: Development Sites and Policies, adopted in June 2015.
- Rochford District Council adopted its Rochford Town Centre Area Action Plan in April 2015.
- South Ribble Borough Council adopted its Local Plan in July 2015.

1.29 As part of this review, it has been recognised that in general, recently adopted policies seek to control the combination of retail and town centre uses as defined by the Framework. The following three trends in frontage policies have been identified:

1. **Minimum Use Class threshold**

A minimum threshold policy can be adopted to control the composition of the shopping frontages in centres. This is where certain Use Classes, typically non-A1 uses, are not permitted if they would result in the reduction of A1 uses below a certain level. This can either be a measured proportion of a particular frontage of a certain area of the centre (i.e. the length of individual shop fronts compared to the total frontage length, or the number of units measured against the number of units in a particular frontage) or the centre as a whole.

The minimum threshold can be set to any use, which the Council desires to maintain, or a combination of uses.

Such an approach is very precise in application and monitoring, but does not offer the flexibility that may be desired to adapt to changing town centre trends and consumer demands and habits. As such, the use of these types of policies is increasingly becoming less popular with Local Planning Authorities. Nevertheless, as an example the following recently adopted development plan documents contain this type of policies:

- Broadland District Council, Development Management DPD, 2015 – see Policy R1
- London Borough of Brent, Local Plan, 2016 – see policy DMP2
- Newham Council, Newham's Local Plan Detailed Sites and Policies Development Plan Document, 2016 – see policy SP10

2. **Qualifying Criteria**

In seeking to control the composition of the shopping frontages in their centres, it is possible to employ a number of criteria, which would need to be met before certain uses are permitted. This would typically

apply to non-A1 uses or even the wider “town centre uses” as defined by the Framework. The latter is more commonly employed for Secondary Frontages, however not in all cases.

The wording of the qualifying criteria differs depending on the Local Planning Authority to reflect their local circumstance. However, below we provide examples of the themes that such policies cover:

- a. Permit proposals where they do not adversely impact either individually or cumulatively, on the function, vitality and viability of a particular type of frontage, specific area of the centre or the centre as a whole. or
- b. Permit proposals where they maintain and enhance the vitality of the particular type of frontage, specific area of the centre or the centre as a whole for example by:
 - i. Promoting evening and daytime economy;
 - ii. Providing for (independent) retailers that contribute to the overall vitality of the centre;
 - iii. Not resulting in such a concentration/ excessive concentration as to lead to a significant interruption in the shopping frontage, reducing its character/ attractiveness/ function. Some local plans defined “concentration” by stating a maximum number of adjoin units in the same Use Class;
 - iv. Retaining active shop window display;
 - v. Opening (staying open) between certain hours;
 - vi. Promoting diversity of offer/ extend the range of activities available to shoppers/ other uses as to enhance the experience of visiting the centre;
 - vii. Increasing footfall/ not resulting in the reduction of footfall;
 - viii. Not resulting in an over proliferation of any one use type;
 - ix. Maintaining the dominant shopping character;

As an example, the following recently adopted development plan documents contain these type of policies:

- Chorley Council, Local Plan 2012-2026 Site Allocations and Development Management Policies, 2016 – see Policy EP6.
- North Somerset Council, Development Management Policies Sites and Policies Plan Part 1, 2016 – see Policy DM63
- Fareham Local Plan Part 2: Development Sites and Policies, 2015 – see Policies DSP21, DSP22
- Hinckley and Bosworth Borough Council, Local Plan 2006 – 2026 Site Allocations and Development Management Policies DPD, 2016 – see Policy DM22
- Blackburn with Darwen Borough Council, Local Plan Part 2 Site Allocations and Development Management Policies, 2015 – see Policy 27
- Bristol City Council, Bristol Central Area Plan, 2015 – see Policies BCAP16, BCAP 17
- Taunton Deane Borough Council, Taunton Deane Adopted Site Allocations and Development Management Plan, 2016 – see Policy TC1

3. A mixture of the above – Hybrid

1.30 In seeking to control the composition of the shopping frontages, it is possible employ a combination of the above options. For example the following Local Plan documents use “hybrid” frontage policies:

- Tunbridge Wells Borough Site Allocations Local Plan , July 2016 - see Polices CR5 to CR12

- Hackney Council, The Hackney Development Management Local Plan, 2015 – see Policy DM9
- Hastings Borough Council, Hastings Development Management Plan, 2015 – see Policy SA1
- South Ribble Borough Council, Local Plan, 2015 – see Policy E3
- Rochford District Council, Rochford Town Centre Area Action Plan, 2015 - see Policy 2

1.31 In order to allow for more flexibly it is common for the minimum A1 Use Class threshold to be supplemented by an “exception” policy where other Use Classes are allowed subject to passing a set of criteria. It should also be noted that in such hybrid cases some policies do not set a fixed threshold, but rather encourage achieving / maintaining a certain threshold.

1.32 It is also possible to supplement a minimum A1 Use Class threshold with criteria based polices, where a proposal would have to pass both sets of tests before being permitted. This is considered to be a very rigid approach that allows for no flexibility.

Recommended Changes to the Policies Map 2013

1.33 In light of the findings above, the recommended changes to frontage policies are set out below. The recommended frontages are shown on the Plans attached to this appendix.

Oxford City Centre

1.34 It is recommended that the Policies Map 2013 is amended to better reflect the primary and secondary nature of a number of frontages in the Primary Shopping Area. The recommended key changes consist of the following:

- The majority of George Street should be classed as Secondary Shopping Frontages (SSFs), to reflect the proliferation of A3 and A4 uses.
- Units on Friars Entry should be lost as a Secondary Shopping Frontage, as these are well segregated from the other Secondary Shopping Frontages.
- Given the ongoing redevelopment of the Westgate Shopping Centre, it is currently not possible to make recommendations on frontages within the shopping centre and the area around it. Whilst south of New Inn Hall Street’ Shoe Lane currently should not be part of a protected frontage, due to lack of connective and active frontages, it is likely that this could be a primary route connecting the Clarendon Centre with Westgate. As such in the future this could become a PSF or a SSF.

Cowley Primary District Centre

1.35 It is recommended that the Policies Map 2013 is amended by way of reducing the extent of the District Shopping Frontage: it is proposed that the eastern frontages are re-classed as SSF due to the limited retail offer. It is also recommended that the term “District Shopping Frontage” is changed to “Primary Shopping Frontage” (PSFs)

Headington District Centre

1.36 It is recommended that the Policies Map 2013 is amended by way of reducing the extent of the District Shopping Frontage: it is proposed that the Southern Parade is re-classed as SSF due to the limited retail offer. It is also recommended that the term “District Shopping Frontage” is changed to “Primary Shopping Frontage” (PSFs). It is also recommended that the extent of the District Centre boundary is expanded to include Bury Knowle Park, as it has an important community function.

Summertown District Centre

- 1.37 It is recommended that the Policies Map 2013 is amended by way of reducing the extent of the District Shopping Frontage: it is proposed that the western frontages are re-classed as SSF due to the limited retail offer and the focus on leisure related uses such as restaurants and cafes. It is also recommended that the term “District Shopping Frontage” is changed to “Primary Shopping Frontage” (PSFs). Furthermore, it is recommended that the extent of the District Centre boundary is expanded westwards along South Parade to include Summertown Library and the North Wall Arts Centre.

Cowley Road District Centre

- 1.38 It is recommended that the District Centre boundary is expanded to in both directions of Cowley Road, and to include community uses to the north of Cowley Road. It is recommended that the centre benefits from both Primary and Secondary Shopping Frontages, where the PSA is contained within the 2013 District Boundary area.

- 1.39 It is also recommended that St Clement Street becomes a Local Centre, with the Primary Frontage focused around the Plain / west end of St Clement’s Street and the rest being SSF.

Blackbird Leys District Centre

- 1.40 It is recommended that the District Centre is re-classed as a Local Centre, with the PSF covering Blackbird Lays Road where there is currently a parade of retail units.

Other Shopping Areas

- 1.41 It is considered that The Little Clarendon Street area and The Walton Street area should become Local Centres, given their localized function and geographical location.
- 1.42 High Street east area could also become a Local Centre, however the retail frontage is fragmented and the area does not have a typical centre character / identity.

Recommended Changes to the Frontage Policies

- 1.43 The ongoing redevelopment of the Westgate Shopping Centre creates uncertainties in the possible changes to the nature and functions of the individual shopping streets in the Primary Shopping Area in Oxford City Centre.
- 1.44 The general trends, described in **Section 2**, also show that the ratio of A Uses is changing with an inclination towards leisure related uses such as bars, cafes and restaurants, as well as other entertainment establishments.
- 1.45 As such it is advised that to ensure the centres’ ability to adapt to future changes, the current PSF and SSF policies are replaced with more flexible wording. Each assessed centre could benefit from a policy that aims to retain a certain threshold of A1 uses in the PSF, yet allows, as an exception, other town centre uses (as defined by the NPPF) where these would not have a significant adverse impact on the role and function of the centre in question assessed against a set list of criteria. A similar approach could be used to control development of Secondary Shopping Frontages where a certain percentage of Class A uses is retained. The table below sets out our recommendations on set thresholds:

Table 13: Recommended Use Class retention

Centre	Recommended Use Class retention
Oxford City Centre	It is recommended that PSF should aim to maintain 70% of A1 Uses; SSF should aim to maintain 85% of Class A Uses
Cowley Primary District Centre	It is recommended that PSF should aim to maintain 70% of A1 Uses; SSF should aim to maintain 60% of Class A Uses.
Cowley Road District Centre	It is recommended that PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses
Headington District Centre	It is recommended that PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses
Summertown District Centre	It is recommended that PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses
Local Centres Walton Street Area Little Clarendon Street St Clement Street Blackbird Leys	It is recommended that PSF should aim to maintain 50% of A1 Uses; SSF should aim to maintain 85% of Class A Uses.
Covered Market	To maintain the integrity of the Market it is recommended that no other uses other than A1, A3, A4 and A5 be allowed.

CONCLUSION

- 1.46 This Appendix has reviewed and provided recommendations on the most appropriate definition of Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs), and Primary Shopping Areas (PSAs) in Oxford City Council.
- 1.47 We recommend that both a town centre boundary and PSA are defined for the District Centres. It is noted that in some centres the two may be the same but in order to arrive at the most up to date position we recommend the Council draws up the PSA in line with the NPPF definition, utilising the findings of the study in relation to the recommended frontages.
- 1.48 Changes to the Policies Map 2013 are recommended. It is also recommended that the current frontage policies are also amended to allow for greater flexibility and the ability to adapt to the changing nature of retail and leisure in centres.
- 1.49 The key recommendation is to adopt a “to setting out frontage polices: in order to allow for more flexibly it is advised that a minimum A1 Use Class threshold is set, which is then supplemented by an “exception” policy which allows other Use Classes subject to passing a set of criteria.
- 1.50 To accommodate the uncertainties the redevelopment of the Westgate Shopping Centre could bring to the individual shopping streets in the Primary Shopping Area in Oxford City Centre, as well as to account for the general inclination towards leisure related uses in centres, the need for frontage policies to adapt to future changes is recognised. As such, it is advised that the current PSF and SSF policies are replaced with more flexible wording, delivered via a the “Hybrid” approach. Each assessed centre could benefit from a policy that aims to retain a certain threshold of A1/ A uses, yet allows, as an exception, other town centre uses as a long as

they pass a set of criteria to show that they would not have a significant adverse impact on the role and function of the centre in question.

- 1.51 As part of our advice, we have set out the recommended Use Class retention level for each centre, and provided possible examples of the exception criteria that can be used. It would be for the Council to then use this information to inform the detailed frontage policy wording formulation.