

8. Ensuring Oxford is a vibrant and enjoyable city to live in and visit and providing facilities and services

8.1 Objectives

- Promote district centres as the hubs for local community focus and identity, with transport interchange and activity and provide a range of social, leisure, sport and cultural facilities appropriate to Oxford's diverse communities alongside housing and employment opportunities
- To ensure that development is supported by the appropriate infrastructure and community facilities
- Maintain the regional role of Oxford city centre as a primary focus for shopping, employment, leisure and cultural activities, with district centres playing an increased but complementary role
- To ensure the potential local benefits of Oxford's role as a major tourist destination are utilised

Ensuring Oxford is a vibrant and enjoyable city to live in

National Planning Policy says:

- 8.2 The *National Planning Policy Framework* (NPPF) states that planning policies should:
 - Recognise town centres as the heart of their communities and pursue polices to support their viability and vitality
 - Define a network and hierarchy of centres that is resilient to anticipated future economic changes
 - Define the extent of town centre and primary shopping areas based on primary and secondary frontages and set clear policies that make clear which uses will be permitted
 - Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
 - Retain and enhance existing markets and where appropriate reintroduce or create new ones
 - Allocate a range of suitable town centre sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed; then allocate edge of centre sites;
 - Recognise that residential development can play an important role in the vitality of centres
 - Where centres are in decline, plan for their future to encourage economic activity (paragraph 23).
- 8.3 The *Planning Practice Guidance* (PPG) sets out a list of "main town centre uses", these are: retail, leisure, entertainment, intensive sport and recreation uses, offices, arts, culture and tourism. The NPPF states that the Plan should define a network and hierarchy of centres together with the











- extent of both town centres and primary shopping areas. Within these centres primary and secondary shopping frontages should be defined.
- 8.4 Local Plans are required to assess and plan for the needs of main town centre uses and adopt a 'town centre first' approach to allocating sites to meet the identified need. A positive approach is needed to improve parking in town centres and where the vitality and quantity is threatened.

The Oxford story – background evidence and the Sustainability Appraisal:

- 8.5 The Retail and Leisure Needs Assessment (RLA) provides a thorough assessment of the performance of the city and district centres in Oxford. In creating and supporting a viable city, retail and the role of all the centres needs to continue to strive to achieve sustainable economic growth and encourage urban renaissance to deliver sustainable development.
- 8.6 The RLA shows that all these centres were performing well and each of the district centres had their own distinctive characteristics and strengths but that there was scope through future policy changes to positively promote a greater mix of uses including leisure, residential, employment and community activities.
- 8.7 The SA highlighted how policies which promote and support the city centre and a wider role for the district centres will have positive impacts on various SA objectives, especially in promoting vibrant communities, poverty, social exclusion and inequality, and essential services and facilities. The SA identified the potential for the loss of local retail facilities if there were no policy protections and it was left to the market to determine and the negative impact that would have. The SA also found that concentrating development in the city centre has the potential to harm the historic character of the area if not suitably managed and designed.

Responses to first steps consultation:

- 8.8 In relation to the city centre, there was strong support for pedestrianisation in creating a more pleasant environment. Suggestions were made for improvements to specific streets including Hythe Bridge Street, Queen Street and Cornmarket Street. Some were concerned about the need to consider cyclists and the management of these spaces. The impact of the new Westgate on other city centre streets should be reviewed, to ensure the entire city centre is supported to perform strongly.
- 8.9 District centres were very well supported and the need to enhance the distinct character of each centre, together with the range of facilities on offer was supported. Blackbird Leys, Templars Square (Cowley Centre), Cowley Road, and Headington were highlighted as ones which would benefit from greater range of facilities and creation of some central features. There was support for more local independent businesses and additional community facilities within district centres.

Potential policy responses:

8.10 The Hierarchy of Centres

The city centre will continue to be the major centre for a wide range of town centre uses throughout the plan period. The city centre performs a local function, providing a range of day-to-day facilities for those who live or work in the centre; however it also provides a much wider sub-regional function, offering higher-order facilities for those in the rest of the city and in the wider area. As referenced in earlier sections, the level of demand on

In relation to the city centre, there was strong support for pedestrianisation in creating a more pleasant environment. the city centre means that there are challenges in terms of congestion and transport capacity. Accommodating more of the forecast need for town centre uses in the city centre will offer benefits in terms of linked trips and in terms of longer distance sustainable travel (for example for those arriving from the wider area by train or by bus from neighbouring towns). Accommodating more growth in an already congested centre will need to be done sensitively and appropriately. It is clear that the city centre will not be able to accommodate all of forecast need for town centre uses.

- 8.11 Oxford already benefits from an established network of smaller district centres; the Local Plan's vision for the city is that these district centres play an important and extended role in the future and accommodate much of the forecast need for town centre uses. District centres offer the opportunity to provide facilities more locally for communities which can reduce the need to travel and ease the pressure on the arterial routes into the city centre. Including a range of town centre uses in district centres will offer (albeit on a smaller scale) many of benefits traditionally associated with the city centre. These include for example, ease of access (especially by public transport); the capacity for linked trips; a vibrancy related to a varied range of uses; activity throughout the day and evening; and providing a heart of the community.
- 8.12 In addition there are a series of local centres in Oxford. These centres generally have less opportunity to accommodate significant growth but play an important role in providing for local day-to-day needs. Local centres can offer a supportive role to the larger district centres.
- 8.13 It is important that new development proposals are appropriate to the role and function of the centre. The hierarchy of these centres is important as it directs developments to areas with best public transport accessibility and co-locates development with other popular uses therefore limiting the need to travel and promoting a sustainable approach. These centres act as a transport hub, where residents, visitors and workers can walk or cycle to and then link up with public transport services as part of an integrated and sustainable approach to travel. The NPPF calls centres 'town centres'. In Oxford these are proposed as:

It is important that new development proposals are appropriate to the role and function of the centre.

Table 3: Centre hierarchy

City centre	Currently defined on the Proposals Map by the city centre Commercial Area	
Primary district centre	Cowley Centre as currently defined by the primary district centre boundary	
District centres	Cowley Road; Headington; Summertown; Blackbird Leys as currently defined by the district centre boundaries	
Local centres	St Clements; Walton St and Little Clarendon St; High St (east); Rose Hill.	

8.14 Centre boundaries would be reviewed and defined on the Policies Map. The Local Plan 2001-2016 includes further centres called Neighbourhood Centres. These are not supported as 'town centres' by the NPPF so would not be included in the hierarchy of centres.

Opt 91: Hierarchy of centres for town centre uses

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a hierarchy of centres that defines areas/ centres that are suitable for a range of uses that attract a lot of people and to establish the priority locations for retail,	This option fully accords with national guidance (NPPF) which promotes competitive town centre environments and encourages 'town centres' to be placed at the 'heart of their communities' and be supported and delivered through a 'defined network of centres.' This approach promotes sustainable travel by directing major developments to the city centre and district centres,

cultural and tourism development:

- 1. City centre
- 2. Primary district centre (Cowley centre)
- 3. District centres
- 4. Local centres

which are 'transport hubs' accessible and well served by public transport, cycling and walking facilities.

This policy approach would apply to a range of uses which the NPPG terms "town centre uses". In addition it accords with national guidance which makes it necessary for Local Plans to 'define a network and hierarchy of retail centres'. This hierarchy would be used for the retail 'sequential approach' and 'impact assessment' to support their vitality and viability.

B) Rejected Option: Expand the hierarchy of centres (Option a) significantly to include centres of employment as well. Employment development that attracts a large number of people should be focused on city and district centres or existing major employment sites.

This option to expand the hierarchy to include centres of employment would not accord with national guidance (NPPF). In some cases these additional centres of employment may be in out-of-centre locations, such as the Oxford Business Park, which is not at present well served by public transport. Furthermore their designation within the hierarchy of centres could potentially attract other uses, such as retail and leisure which may then be competing with 'employment' uses for limited space. The Employment Land Assessment (ELA) makes it clear that there is a shortfall of 'employment land' within Oxford to meet future forecast demand.

C) Rejected Option: Expand the hierarchy of centres (Option a) to include Park and Ride sites.

This option to include Park and Ride sites would not be in conformity with national policy. Whilst they play an important role as 'transport hubs' they are all in out-of-centre locations and in some cases within areas of low lying land/flood plain. So to include them within the hierarchy could potentially attract further major development to these less sustainable areas compared to the hierarchy in Option a.

D) Rejected Option: Do not specify general areas for uses that attract a lot of people.

Policy approach

This option would clearly be contrary to national government policy. It would be in direct conflict with the 'town centre first' policy; and would not promote sustainable development or sustainable travel.

Opt 92: Widening the role of district centres

A) Preferred option: Define specific The Retail and Leisure Needs Assessment recognised that each district centre mix/role policies for each district centre had its own distinctive character. Whilst each of these centres is performing to reflect the local character/function/ well according to key indicators there was an acknowledgement that there are strengths and any development challenges facing these centres, not least from online trading that could threaten their future vitality and viability. This option responds by seeking to build on the opportunities. strengths of each centre but ensure positive measures are taken to promote Review the boundaries of the district economic growth through a greater mix of uses, both commercial and residential and ensure that they continue to provide the focus for the local community. The centres role of these centres as an important 'transport hub' should be recognised and

developed.

Consequences of approach/discussion

B) Rejected Option: Do not include a policy that defines a distinct mix/role for each district centre.

There is no acknowledgement of the distinctive role that each district centre performs and the opportunities that each has. This would not help develop the identities of the district centre and would continue the status quo.

8.15 The sequential approach and impact assessments

The NPPF states that local planning authorities should apply a sequential approach to the location of town centre uses, and a sequential test to planning applications for main town centre uses that are not in an existing centre. It further states that when assessing applications for retail, leisure and office development outside of centres, local planning authorities should require an impact assessment to demonstrate that they will not have a significant adverse impact (cumulatively with other commitments in the area) on any defined centres.



Opt 93: The "sequential approach" and "sequential test": location of town centre uses

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy which sets out the sequential approach based on: centres first, then edge of centres and only out-of-centre locations where no alternative sites are available. Require applicants to demonstrate how they have applied the sequential approach. Include criteria that will be used to assess applications for town centres uses outside of the existing centres. These could include accessibility by public transport; that negative impacts on the road network can be mitigated; and no harm to adjoining land uses.	The NPPF states that authorities should apply a sequential approach to the location of town centre uses. This option would set out the sequential approach that forms part of the strategy of the Local Plan and a policy that would be used to assess and determine planning applications that lie outside the defined 'centres'. This option provides a sequential preference in line with the NPPF by suggesting 'edge-of-centre' sites first and ensures that only out of centre locations are considered when they are considered acceptable in line with the criteria. The NPPF defines 'edge-of-centre' for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.
	(This links with the option on primary and secondary shopping frontages below.)
B) Alternative Option: Do not include a policy that sets criteria for town centre use proposals outside of centres.	This option relies on national policy to inform decisions on town centre use proposals outside the centres. The NPPF references accessibility and connectivity to the centres as criteria for assessing proposals but no further or locally specific criteria.

Opt 94: "Impact Assessment": threshold for requiring an impact assessment for applications for town centre uses that are not located in existing centres

Policy approach	Consequences of approach/discussion		
A) Preferred option: Require new retail developments of 350m ² gross and above to submit an impact assessment on the city centre and district centres and local centres.	The NPPF states that authorities should require an impact assessment for applications for town centre uses proposed outside of existing centres. This would be used to demonstrate that they will not have a significant adverse impact (cumulatively with other commitments in the area) on any defined centres in Oxford. The default threshold for this requirement is 2,500m² however the NPPF allows for a locally set threshold. The Retail and Leisure Study has identified the dynamic growth in smaller convenience stores operated by the major grocers. The main grocers are generally seeking new convenience stores with a minimum floorspace of around 372m² (4,000ft²) gross, which would be missed by the national default threshold but be picked up with a 350m² threshold. In addition, modern retailers selling a range of comparison goods have requirements for larger format shop		
	units with a minimum floorspace of circa 465m ² gross which provides operators with the necessary minimum 'critical mass' of sales needed.		
B) Alternative Option: Do not include a policy setting a locally defined threshold for requiring an impact assessment on the centres. Rely on the nationally set 2,500m ² threshold.	A reliance on the nationally set 2,500m ² would not capture a significant proportion of proposals for new development that are likely to come forward in Oxford.		

8.16 Maintaining the Vibrancy and Vitality of the city centre and district centres

The city centre: Over the past decade there have been many changes in the city centre. George Street and Gloucester Green have developed a leisure and cultural focus with an increase in the number of restaurants catering for the evening economy centred on the cinema and theatres. The traditional and vibrant Gloucester Green market remains popular.



- 8.17 The city centre's shopping 'heart' is currently centred on Cornmarket St, the Clarendon Centre and Oueen Street. The opening of the new Westgate Shopping Centre will result in changes, with occupiers shifting around. New occupiers may come forward and new independent retailers might also emerge. Policy will need to be flexible towards this.
- 8.18 The High Street remains a popular location for many high-end shops and the Covered Market is a unique asset as it increases the diversity of retail in the city centre. Broad Street is a focus for tourists as it is home to the Visitor Information Centre, specialist markets and acts as a gateway to the prime tourist attractions of the Sheldonian Theatre, Bodleian Library and Radcliffe Camera.
- 8.19 The Local Plan needs to recognise these changes and build on them to ensure that all areas of the city centre develop an identity, continue to remain vibrant during the day and night time and provide for the shopping and leisure needs of local people and visitors. The NPPF says that Local Plans should identify Primary Shopping Frontages (PSF) and Secondary Shopping Frontages (SSF) on the Policies Map and make clear which uses will be permitted in such locations.
- 8.20 PSF aim to maintain a high proportion and dominance of A1 (shops) whereas the approach to SSF is more relaxed and allows for a much wider variety of A Class occupiers (shops; professional; food and drink; drinking establishments; hot food takeaways). By categorising the streets as PSF or SSF enables a different level of control over their uses. PSF would protect A1 uses more strongly, SSF would have much more flexibility for other A uses.
- 8.21 The options below include two different proposals for the city centre PSF and SSF which are set out below and in the accompanying maps.

Opt 95: Primary and Secondary Shopping Frontages of the city centre

Policy approach

A) Preferred option: Identify the Primary and Secondary Shopping Frontages in the city centre.

PSF and SSF would remain broadly similar to the frontages in the Local Plan 2001-2016 with the main changes being:

- George St would become SSF from
- St Ebbe's would become SSF from PSF

Within these, adopt a flexible 'hybrid' policy that maintains A1 at 70% in PSF and 80% A Class in SSF across the whole city centre. Allows other uses as exceptions if criteria are met such as:

- Development would not have a significant adverse impact on the role and function of the centre
- Development would make more efficient use of the upper floors.

Allow no other uses other than A1. A3. A4 and A5 in the Covered Market.

Consequences of approach/discussion

This approach adopts the recommended shopping frontages and hybrid policy proposed in the Retail and Leisure Study. The hybrid policy allows more flexibility across the whole of the city centre. It incorporates the recommended percentages of A1 in the PSF and A Classes in the SSF.

By including the new Westgate Centre and the Clarendon Centre in the PSF calculations, it will establish a significant proportion of A1 in the PSF meaning that there will naturally be more flexibility within the remainder of the PSF, such as in Cornmarket St where there is a growing interest for food and drink establishments.

By classifying George St and Gloucester Green as SSF allows significant flexibility for all A uses with no specific requirement for a proportion of A1.

City centre PSF would include: Queen Street; High St (west); Cornmarket St; Broad St; Magdalen St; new Westgate Centre; Clarendon Centre; Market St (part); Golden Cross;

City centre SSF would include: George St; Gloucester Green; Gloucester St; St Aldate's (part); St Ebbes St; Bonn Sq; Market St (part at western end); Turl St; St Michael's St (part); Ship St (part); New Inn Hall St (part); Shoe Lane; New Inn Hall St (part).

See Map 4 for detailed map.



Support new residential and employment on upper floors.

Identify the shopping frontages and resulting Primary Shopping Area on the Policies Map.

The NPPF requires the definition of Primary Shopping Area that generally comprises the primary and secondary shopping frontages. The resultant boundary would be used in assessing proposals in edge of centre locations (see option on the "sequential approach" and "sequential test": location of town centre uses above).

B) Alternative Option: Identify the Primary and Secondary Shopping Frontages in the city centre.

PSF and SSF would alter significantly from the Local Plan 2001-2016 as follows:

- Queen Street and the High Street (from Carfax to the Covered Market) would remain as the only PSF
- All other shopping frontages would be SSF
- Exclude the new Westgate centre, Clarendon Centre and Covered Market from shopping frontages

Within these, adopt a flexible 'hybrid' policy that maintains A1 at 70% in PSF and 80% A Class in SSF across the whole city centre. Allows other uses as exceptions if criteria are met such as:

- Development would not have a significant adverse impact on the role and function of the centre
- Development would make more efficient use of the upper floors.

Support new residential and employment on upper floors.

Identify the shopping frontages and resulting Primary Shopping Area on the Policies Map.

C) Rejected Option: Do not include a policy to identify Primary and Secondary Shopping Frontages and do not place any restrictions on shop frontage but rely on the market and Permitted Development and Prior Approval process (gaining approval for a change of use without requiring planning permission).

This approach does not adopt the recommended shopping frontages in the Retail and Leisure Study. It adopts the Study's hybrid policy which allows more flexibility across the whole of the city centre. It incorporates the recommended percentages of A1 in the PSF and A Classes in the SSF.

By only classifying Queen St and the western end of the High St as PSF would grant significant flexibility for units within the SSF to change to any A Class use. This might provide more opportunities for the SSF to adapt to changes in the retail sector. Only Queen St and High Street would be afforded specific protection for A1.

The new Westgate Centre, Clarendon Centre and Covered Market would be excluded from the shopping frontages and left to manage themselves within the context of their bespoke management arrangements.

City centre PSF would include: Queen Street; High St (west);

City centre SSF would include: Cornmarket St; Broad St; Magdalen St; Market St (part); Golden Cross; George St; Gloucester Green; Gloucester St; St Aldate's (part); St Ebbes St; Bonn Sq; Market St (part at western end); Turl St; St Michael's St (part); Ship St (part); New Inn Hall St (part); Shoe Lane; New Inn Hall St (part).

See Map 4 for detailed map.

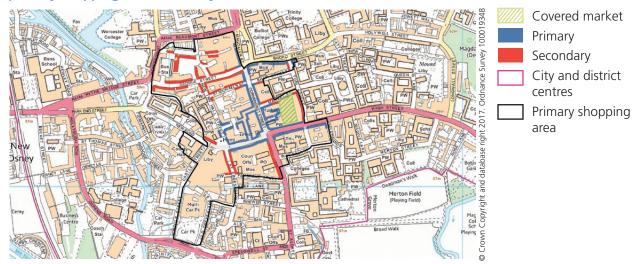
This approach would be contrary to the NPPF which requires Local Plans to set policies that identify PSF and SSF and make clear which uses will be permitted

For the purposes of assessing Prior Approval applications an indication would still be required of the proportion of A1 uses expected in the PSF to ensure that A1 loss would not impact upon shopping provision.

It would likely result in the erosion of key shopping streets to other non-A1 (shop) uses.



Map 4: Preferred Option primary and secondary retail frontages and primary shopping area in the city centre



- 8.22 **District and local centres:** Each of the district centres has a distinctive character and has strengths and opportunities on which to build. The Retail and Leisure Study has looked at each in detail as well as seeking feedback from household surveys and has made recommendations for how the Local Plan could help shape these centres. The NPPF looks to promote and strengthen 'town centres', which district centre are classed as, and says Local Plans should identify Primary Shopping Frontages (PSF) and Secondary Shopping Frontages (SSF) on the Policies Map and make clear which uses will be permitted in such locations.
- 8.23 Local centres include a range of shops and some services of a local nature serving a small catchment area.

Opt 96: Primary and Secondary Shopping Frontages of district and local centres

$\mathbf{p} \mathbf{n}$	IICI	<i>1</i> 21	nn	ro	ach
ı	110)	/ CI	μþ	ı U	ach

A) Preferred option: Include a policy identifying the Primary and Secondary Shopping Frontages for the district centres.

Within each district and local centre, adopt a flexible 'hybrid' policy that maintains a proportion of A1 in PSF and A Class in SSF across each District and local centre. Allows other uses as exceptions if criteria are met such as (criteria could vary depending on the district centre):

- Development would not have a significant adverse impact on the role and function of the centre
- Development would make more efficient use of the upper floors.

Support new residential and employment on upper floors.

Local centres would include St. Clements, Walton Street and Little Clarendon Street, High Street (east) and Rosehill.

Consequences of approach/discussion

Derived from the Retail and Leisure Needs Study, exceptions and Shopping Frontage requirements would be developed along these lines:

Cowley Centre (primary district centre): Providing the range of retail units and type of environment that will attract high quality operators; additional quality cafés, restaurants and bars; improving the pedestrian connections between the shopping centre and retail park. PSF should aim to maintain 70% of A1 Uses; SSF should aim to maintain 60% of Class A Uses.

Blackbird Leys: Improvement and investment including the surrounding services and facilities to bring forward a modern centre that is fit for purpose. PSF should aim to maintain 50% of A1 Uses; SSF should aim to maintain 85% of Class A Uses.

Cowley Road: Consolidation of a retail core and a clearer definition of the primary shopping area; acknowledge the current restaurant and leisure provision. PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses.

Headington: Improve the quality of the centre's comparison goods offer; develop restaurant cultural and leisure opportunities. PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses.

Summertown: build on its independent offer by enhancing the variety and choice of retailers; consider potential development sites. PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses



PSF and SSF boundaries to be based on the recommendation in the Retail and Leisure Study.

Local centres: PSF should aim to maintain 50% of A1 Uses; SSF should aim to maintain 85% of Class A Uses.

It would make more efficient use of land by encouraging residential and employment on upper floors.

The NPPF requires the definition of Primary Shopping Area that generally comprises the primary and secondary shopping frontages. The resultant boundary would be used in assessing proposals in edge of centre locations (see option on the "sequential approach" and "sequential test": location of town centre uses above).

B) Rejected Option: Do not include a policy to identify Primary and Secondary Shopping Frontages and do not place any restrictions on shop frontage but rely the market and Permitted Development and Prior Approval (gaining approval for a change of use without requiring planning permission).

This approach would be contrary to the NPPF which requires Local Plans to set policies that identify PSF and SSF and make clear which uses will be permitted in them.

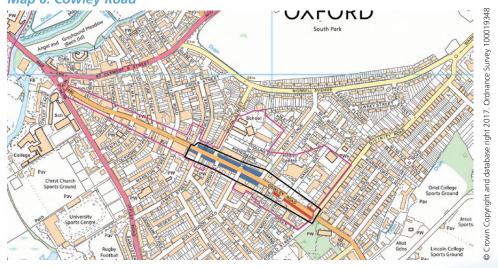
For the purposes of assessing Prior Approval applications an indication would still be required of the proportion of A1 uses expected in the PSF to ensure that A1 loss would not impact upon shopping provision.

It would likely result in the erosion of key shopping streets to other non-A1 (shop) uses.

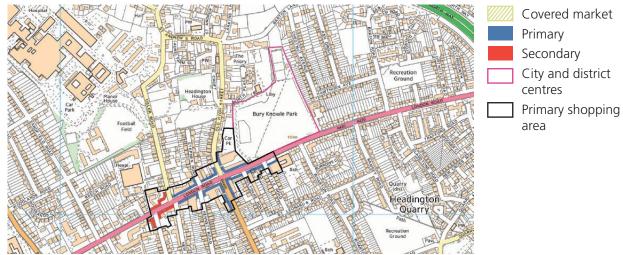
Map 5: Cowley Centre



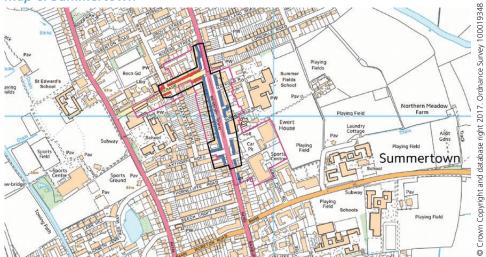
Map 6: Cowley Road



Map 7: Headington



Map 8: Summertown



8.24 Evening, cultural and social activities

Oxford has a rich infrastructure of cultural and social activities and venues, from theatres, museums, cinemas, galleries, sports and music venues to restaurants and pubs. These uses can help to keep a centre vibrant and active and add greatly to the local quality of life.

Opt 97: Evening economy: cultural and social activities

Policy approach	Consequences of approach/discussion		
A) Preferred option: Include a criteria based policy which protects existing venues, and provides a more detailed policy approach to determining new proposals (e.g. locational, clustering, and neighbourliness issues).	There is a national trend of music and other social venues closing in large part due to other non-cultural uses commanding higher land values. This approach would help guard against the unnecessary loss of valued social, recreational and cultural facilities and services. It would help ensure that such facilities are able to develop and modernise and are retained for the benefit of the community. It is important that evening economy uses can flourish and co-exist with other uses especially where they are found in close proximity to one another. A specific policy could vary across the centres in response to local character, to ensure that the appropriate approach is taken to locational and neighbourliness issues.		
B) Alternative Option: Do not include a policy on the evening economy but rely on other policies relating to the city and district centres.	Leisure, entertainment, cinemas, restaurants, night-clubs, bars and arts and cultural uses (among others) all fall within the NPPF definition of "main town centre uses". This means that they are generally appropriate in town centres (in Oxford these are the city and district centres) and are subject to the "sequential approach" and "hierarchy of centres" described above.		



Ensuring Oxford is a vibrant and enjoyable city to visit

National Planning Policy says:

- 8.25 The NPPF refers to tourism in relation to its acceptability as a town centre use in order to promote the vibrancy and competitiveness of these areas. The PPG notes that tourism is extremely diverse and covers all activities of visitors. It states that local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism.
- 8.26 The government's Tourism Action Plan (2016) supplements the industrial strategy and focuses on making the sector more internationally competitive and resilient and ensuring that the benefits of growth in the sector are felt widely. Aspects of the action plan particularly relevant to the Local Plan are improving skills in the sector and the quality of the public transport offer.

The Oxford story – background evidence and the Sustainability Appraisal:

- 8.27 Oxford has an increasing number of visitors and overnight stays and remains a crucial destination of the national tourism industry. However, Oxford has a very large number of tourists making very short visits, often only for part of, or one day. The economic benefits to the city of these short visits are slight, while the impact of these visits is significant. For example many of these short-visit tourists arrive on coaches for the day; these add to the pressures on the highway network, add to congestion and require land for parking. These transport impacts are addressed in Section 7 on Transport. Policies which facilitate increased overnight stays will result in greater spend in Oxford's shops and restaurants which will in turn boost their viability and Oxford's economy.
- 8.28 The SA highlighted how policies which support Oxford's tourist industry will have positive impacts on various SA objectives, especially in promoting sustainable tourism and a vibrant economy. However, the SA highlights potential conflicts between the enhancement of Oxford's attractiveness for visitor and the strain on the existing transport infrastructure and the potential damage to Oxford's communities if their needs are not supported alongside a growth in tourism.

Responses to first steps consultation:

8.29 Some respondents commented that they disliked the high levels of tourism Oxford attracts, that there were too many large groups of tourists and that Oxford needs quality businesses which caters to the needs of local residents rather than tourists. While the income from tourism is an important part of the city's economy, this is an indication that Oxford requires a better management of its tourists and, in particular, balancing the needs of visitors with the needs of residents.

Potential policy responses:

8.30 Visitor facilities

In addition to tourists the short-stay accommodation market is very strong for business travellers in the city and provision of more accommodation would additionally help support the economy objectives of the Local Plan. The hotel background paper highlights that when Oxford's hotel occupancy and room rates are compared with those of comparable cities,

Oxford has an increasing number of visitors and overnight stays and remains a crucial destination of the national tourism industry.



there is unmet demand and potential for growth in all varieties of short-stay accommodation. Oxford is an internationally significant tourist destination and needs robust tourism policies which both encourage longer-stay tourism and mitigate the negative effects of tourism (especially those of short visit tourism) on its residents and businesses. Policies will need to be clear in the stance taken in balancing these considerations.

8.31 Increasingly, short-term lets of domestic properties are being marketed as holiday lets and for those who work in Oxford during the week, through websites such as AirBnB and Tripadvisor. In 2016 524 properties were found to be available for short lets in Oxford on the AirBnB website. 300 of these were whole house lets. The way that properties are being let means that no planning application to change use from a domestic property is required. Currently few regulations apply and business rates are rarely applicable. The location of this type of accommodation also cannot be controlled. Consideration will be given to implementation of any legislation introduced that provides the ability to better control these uses.

Opt 98: Tourist/Visitor attractions

Policy approach	Consequences of approach/discussion		
A) Preferred option: Have a policy permitting new tourist attractions only where they will not increase road congestion, i.e. in locations easily accessible by public transport, and particularly the city and district centres, where they can be served by existing facilities, or through improvements to public realm or facilities.	This offers great benefits to all SA objectives it affects but most notably it has potential for reduced congestion and economic benefits as this option also lends itself to enhancing the vitality of the centres. It would be important not create attractions which conflict with the historic city centre and undermine Oxford's character.		
B) Alternative Option: Have a policy that does not permit new tourist attractions.	This option would limit the impact of tourism on Oxford's transport system and communities and could also help maintain the historic character of the city centre by limiting new developments . However, this will not contribute to the understanding and appreciation of Oxford's unique history nor make it more accessible. More damaging to Oxford would be, however, the damage to its tourism industry and thereby its economy.		
C) Alternative Option: Do not include a policy on tourist attractions.	Would be reliant on other policies to control the negative effects of potential developments.		
D) Rejected Option: Include a policy that is generally permissive of tourist attractions.	This would not limit development of new attractions to. This may help to support restoration projects and finance upkeep of historic buildings which could help to protect the historic character of the city centre; however, the potential implications on transport are severe. This option allows the possibility of locating attractions far from existing transport hubs which could generate more congestion.		

Opt 99: Short-stay accommodation (hotels and guest houses)

Policy approach	Consequences of approach/discussion	
A) Preferred option (Combination of A + B): Include a policy which seeks to prevent the loss of existing short-stay accommodation to other uses.	Given the importance of tourism to Oxford and the demand for hotel bed spaces, identified in the hotel background paper, it is important to seek to prevent the loss of existing visitor accommodation to other uses. Inclusion of criteria which must be met before a loss will be permitted (such as viability, marketing etc.) would ensure that existing sites that function poorly are not prevented from being redeveloped.	
B) Preferred option (Combination of A + B): Include a policy to permit new purpose-built short-stay accommodation in the city centre, district centres and on Oxford's main arterial roads.	This approach would encourage the provision of accommodation, which would contribute to Oxford's long-term goal of encouraging a higher percentage of visitors to stay overnight in Oxford and benefit the economy. Allowing short stay accommodation in the centres will also enhance the vibrancy of these areas; and the NPPF deems this an acceptable use for such areas. The pressure on the	



	centres to accommodate a wide range of uses could be alleviated by allowing short-stay accommodation additionally along arterial routes. This option could also apply to extension of existing premises in these locations. Potential risks to this approach could include an increase in traffic along arterial roads, or risk this use becoming dominant; the policy would need to consider how these risks could be mitigated.
C) Alternative Option: Allow new short-stay accommodation in the city centre and at district centres.	This approach will enhance the vibrancy of the city and district centres as supported by the NPPF. However only allowing short-stay accommodation in such a limited number of locations could result in this use squeezing other uses, resulting in a loss of variety which is so important in these centres. This option could also apply to extension of existing premises in these locations.
D) Alternative Option: Allow new short-stay accommodation across the city.	This will offer the potential for many more sites to be deemed appropriate for development for short-stay accommodation. It could potentially greatly encourage overnight stays in Oxford and add to Oxford's economy. This option could also apply to extension of existing premises. However, allowing these facilities across Oxford could result in sites coming forward that are poorly located in terms of adding to congestion or impacting on residential amenity for example.
E) Rejected Option: Include a policy to prevent new short-stay accommodation.	It is quite likely that this would in practice reinforce the current situation with more tourists opting to visit for the day only and limited if any effect on overall numbers. This option would enable more sites to be developed for other priorities, however it would hamper Oxford's long term, tourist objective of encouraging more overnight stays and increased visitor spends in Oxford. This could harm Oxford's economy.
F) Rejected Option: Include a policy which allows the loss of short-stay accommodation to other uses.	Given the range of other priority uses in the city it may be beneficial to consider alternative uses for existing short-stay accommodation. Short-stay accommodation sites are generally located in either city centre type locations, which could be redeveloped (for retail, office or residential uses for example) or residential areas and so could be converted or redeveloped to provide more homes. This option would however severely hamper Oxford's long term, tourist objective of encouraging more overnight visitation and increased visitor spends in Oxford.
G) Rejected Option: Do not include a policy on short-stay accommodation.	This approach fails to recognise the importance of the tourism sector and creates great uncertainty. It fails to promote Oxford's objective of encouraging overnight visitation. This means Oxford is reliant on market influences alone to provide adequate accommodation and the lack of direction also means any new facilities could be poorly located to serve their purpose.

Providing communities with facilities and services

National Planning Policy says:

- 8.32 The NPPF states that the planning system should seek to support: "strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being" (paragraph 7). It says that local authorities should plan positively for the provision and use of community facilities and other local services, guarding against loss of valued facilities and ensuring an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 8.33 The NPPF states "Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including



heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demand" (paragraph 162). It also states that "it is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (paragraph 177)

8.34 The PPG contains more details on the operation the Community Infrastructure Levy and the links with other forms of planning obligation.

The Oxford story – background evidence and the Sustainability Appraisal:

- 8.35 The Oxfordshire Clinical Commissioning Group is responsible for buying health services for those who live in Oxfordshire. All GP practices are members of OCCG, and the CCG's priorities are informed by the health professionals who work at these surgeries. Current priorities in the Oxfordshire CCG Strategy for 2014/15-2018/19 include delivering fully integrated care, close to home, for the frail elderly and people with multiple physical/mental health needs and continuing to provide preventative care and to tackle health inequalities for patients and carers.
- 8.36 The Oxfordshire Healthcare Transformation Programme is working towards development of plans for the next generation of integrated GP, community and hospital services. This is part of the Buckinghamshire, Oxfordshire and Berkshire Sustainability and Transformation Plan.
- 8.37 The programme's aims are to:
 - Provide innovative ways of delivering outcomes for a society that lives longer and expects more
 - Maximise the value of Oxfordshire's health and social care spend
 - Find ways to become better at preventing and managing demand
 - Help people to take greater responsibility for their own health and prevent avoidable disease
- 8.38 The Board behind the programme is made up of the Oxfordshire Clinical Commissioning Group, Oxford Health NHS Foundation trust, Oxford University Hospitals NHS Trust, South Central Ambulance NHS Foundation Trust, the Oxfordshire GP Federations and Oxfordshire County Council. The Local Plan will need to reflect the programme and outcomes of this work.
- 8.39 The SA indicates that policies which seek to provide communities with facilities and services will have positive impacts on wide range of SA objectives, especially in promoting vibrant communities, poverty, social exclusion and inequality and essential services and facilities, but also human health and education. The SA does not identify any negative impacts from these policy approaches on the SA objectives.

Responses to first steps consultation:

8.40 At the First Steps consultation there was concern about the pressure that new employment and housing development might place on infrastructure. There was a view that current infrastructure could not support growth and that new or improved infrastructure needs to be in place to facilitate the growth. Comments were made that any new areas of housing need access to community facilities and new infrastructure and that family accommodation should be near schools and that GP provision needs improvement. Many people felt that it was important for developers to contribute to the provision of infrastructure. It was suggested that the focus should be on improving facilities in the most deprived areas.

At the First Steps consultation there was concern about the pressure that new employment and housing development might place on infrastructure.

Potential policy responses:

- 8.41 Provision of infrastructure and facilities to support new development It is important that new development in Oxford is supported by sufficient infrastructure. The options below consider funding of the infrastructure and also some key facilities that will be needed to support new development. Some facilities, such as sports facilities, community facilities and schools, have been considered elsewhere in the *Preferred Options Document*.
- 8.42 It is intended that the Local Plan makes provision for the integration of any potential future sustainable urban extensions to the city. It may be that, as a result of the work of the Oxfordshire Growth Board and neighbouring Local Plans, housing is proposed on the edge of Oxford. It will be important therefore to ensure that connections and links, and access to infrastructure and facilities within the city are available to residents of the new homes.
- 8.43 The City Council will look at funding infrastructure across Oxford through a range of mechanisms including Growth Funds and the Local Enterprise Partnership.

Opt 100: Infrastructure and developer contributions

Policy approach	Consequences of approach/discussion		
A) Preferred option: Include a policy that sets out the approach to developer contributions (e.g. Community Infrastructure Levy and Section 106).	A policy will help to provide clarity and certainty about what is expected in Oxford. However the mechanism for requiring contributions from developers to pay for infrastructure needs is unlikely to remain the same during the Plan period. There is a risk that any policy will become superseded by changes to the regulatory framework. Any such policy will need to be carefully framed.		
B) Alternative Option: Do not include a policy on Infrastructure and developer contributions.	The mechanisms for infrastructure and developer contributions are set out clearly in Government guidance. The City Council intends to update its CIL charging schedule. This means that specific policy wording may be unnecessary. However, to make a clear link between further guidance and the Local Plan, a policy may be required.		

8.44 Utilities

Smart Oxford is a strategic programme of a wide range of city partners working together to develop and promote Oxford as a smart city. The aim of Smart Oxford is to build a stronger, safer, economically and environmentally sustainable city, to help its people to identify and be part of city solutions, to provide a test bed for world class researchers and innovators, to generate growth and jobs, to advance economic & social prosperity, and to help improve the quality, effectiveness and efficiency of city services⁵. The Council will seek to ensure that all new development and wherever possible all residents and business have ubiquitous access to superfast speeds of internet connectivity.

⁵ www.oxfordsmartcity.uk

Opt 101: Delivering High Quality Ubiquitous Digital Infrastructure

Policy approach	Consequences of approach/discussion	
A) Preferred option: Require all developers of employment floorspace over a certain threshold to include the necessary infrastructure to ensure that future business occupants can benefit from high quality digital facilities. Include a policy which is supportive of the expansion of high quality ubiquitous digital communications.	This will promote economic growth for businesses and encourage new businesses to Oxford. Improvements in the digital infrastructure should improve communications and remote working opportunities therefore reduce the need for car journeys.	

B) Rejected Option: Do not include a policy on digital infrastructure provision.

Not having a policy would not deliver Smart City objectives

Opt 102: Waste water and sewerage infrastructure

Policy approach	Consequences of approach/discussion		
A) Preferred option: Do not include a policy on water and sewerage infrastructure.	Thames Water comment on individual planning applications and can object if an area does not have sufficient water and waste water infrastructure capacity. If this occurs, the City Council would add a condition to a planning permission requiring that the infrastructure is provided which would be undertaken through other legislative requirements. When planning strategically, as through this Local Plan process, Thames Water would be consulted on proposed sites for development to ascertain infrastructure capacity. Any issues identified at these early stages would aim to be resolved through the Plan making process. The absence of a policy would not cause infrastructure issues because other		
	legislative frameworks exist to address this.		
B) Rejected Option: Include a policy that would permit development only where sufficient capacity exists or where extra capacity can be provided.	As explained above, other legislative requirement exist to ensure that development has adequate water and waste water capacity. A restrictive policy would conflict with the existing legislative process.		

8.45 Access to education (state primary and secondary schools), primary healthcare and community facilities

The provision of sufficient school places is the responsibility of Oxfordshire County Council as the Local Education Authority. The Local Plan's role is to ensure growth is supported by necessary infrastructure including education and it can protect sites and encourage intensification to increase school place capacity. Meeting school places has wider sustainability effects than simply education, it is also about reducing inequalities across Oxford, and schools are increasingly performing multi-functions in terms of being a wider community hub incorporating other social benefits such as access to sports facilities, community facilities or health services, as exemplified at Barton Park new community hub which incorporates the primary school.

- 8.46 Community facilities can include community centres, children's centres, meeting venues for the public or voluntary organisations, public halls and places of worship, leisure centres, pavilions, stadiums, public houses, club premises or arts buildings that serve a local community. Other types of buildings might also be classed as, and function as, community facilities.
- 8.47 These are important in meeting social, leisure, cultural and religious needs and help develop social inclusion and a high quality of life. Sometimes facilities might not be fit-for-purpose or provide poor accessibility where improvements on site or nearby might be more sustainable. Co-locating multiple facilities on a single site can be an efficient way to improve accessibility and quality.
- 8.48 Due to the changing nature of socialising habits a number of traditional pubs have struggled and closed. There are often other land uses which are more valuable or profitable. However the traditional pub has an important social function for the community they serve. It can provide a local meeting place, venue for entertainment and a focus for social gatherings. Pubs are often an integral part of an area's evening and night time culture and economy.



Opt 103: Access to education (state primary and secondary schools)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Protect existing state primary and secondary school sites and support extensions and more intensive uses on site.	This approach supports efficient use of land through intensification and modernisation. Provision on existing sites means that schools are not competing with housing or employment use elsewhere. It ensures adequate school places for local children. It may result in increased traffic/congestion on existing school routes and any additional pressures will need to be mitigated, but it could also offer potential to provide improvements to sustainable modes of travel.
B) Preferred option (Combination of A + B): Indicate through the site allocations which sites would be suitable for a school use and identify a site for a new school if considered necessary. Introduce criteria for assessing the suitability of unallocated sites that might be proposed for schools, which will include issues such as access, accessibility, size of site and neighbouring uses.	The Local Plan can identify sites that might be suitable for a school where there is an identified need in the local area. This would need to be supported by the County Council or it would not be deliverable.
C) Alternative Option: Do not allocate sites for schools but set out criteria against which school proposals will be judged.	An approach that uses a criteria based policy with no site allocations would help with making planning decisions but without being prescriptive on location, This option would mean that opportunities may be missed to help deliver school sites (which can be challenging) and that there would be less certainty that locations will be proximate to demand/need.

Opt 104: Primary healthcare services

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Have a policy approach that is generally permissive of new primary healthcare facilities if certain criteria are met, for example that they are in accessible locations.	Primary health care facilities will not be suitable in all locations, so it is sensible to include criteria so that proposals can be assessed. However, adequate provision of health care facilities is important for residents' quality of life, so new facilities should be generally supported by the Plan. Facilities shared with other providers are likely to be particularly suitable given the constrained nature of Oxford.
B) Preferred option (Combination of A + B): Identify specific areas or development sites that will need to provide primary healthcare facilities.	Substantial population growth is expected in the city over the Local Plan period and new homes will be delivered placing increasing pressure on primary healthcare services. Where there are large new developments occurring or where primary healthcare facilities are closing there will be added pressure. The Plan could identify development sites where a new GP surgery would be supported.
C) Rejected Option: Do not include a policy on new primary health care facilities.	This would mean that no expectation of delivery of new facilities would be included in the Plan, and there would also be no criteria set out to aid assessment of any proposals for new facilities. As there is a need for new facilities which will not necessarily be suitable in all locations, it is sensible to include a policy relating to primary health care facilities.

Opt 105: Community facilities

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + C): Have a criteria based policy to protect community facilities, allowing loss under only certain exceptional circumstances, such as replacement nearby, or significant improvement to nearby facilities, or demonstration they are surplus to requirements and that	Because circumstances change it is sensible to have a certain amount of flexibility in the policy approach, rather than a blanket protection. This approach will enable greater flexibility in the way community facilities are provided, to reflect population growth and changing needs. In a city with limited space, this should help to ensure the best possible provision overall.

opportunities have been explored for multi-use or other community uses.	
B) Alternative Option: Include a blanket protection of all community facilities.	This approach is not flexible enough to the changing needs of Oxford's neighbourhoods. These facilities are valued and very important. However, reprovision may have the potential to provide a facility better suited to modern needs. Not all facilities are in the best locations, well-used or suitable for a flexible and wide range of uses.
C) Preferred option (Combination of A + C): Require a community use agreement for all new community facilities.	This would apply to community facilities that are not public facilities. This will maximise the accessibility of facilities to local communities.
D) Rejected Option: Do not include a policy on community facilities.	This will mean that the Local Plan will not set out an expectation that community facilities will be retained, or set out criteria that allow a judgement to be made about the suitability of alternative provision.

Opt 106: Pubs

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a policy to protect pubs, using a criteria based approach. This would include evidence of diversification to establish a wider customer base; lack of viability; with marketing a key component. There should also be demonstration of a lack of need for a pub, for example because of the availability of other pubs in the area and an assessment of the community value of the pub and the importance of its design, character and heritage to the wider streetscape and local area.	This option offers a balanced approach to the protection of pubs considering firstly whether the owners have sought to diversify to widen the customer base (e.g. restaurant focus, community hub, visitor accommodation). Secondly whether these is a viability argument, including appropriate marketing having been undertaken. Thirdly, whether there are other pubs within a defined area that would still serve the catchment area. Fourthly the importance of the pub as a community facility in the area. It would also be useful to consider the economic role of the public house, how it functions in serving the local community or wider city-wide role.
B) Alternative Option : Have a policy to protect pubs relying on marketing evidence only.	This option weakens the protection that could be afforded to public houses, since whilst viability is a very strong criteria that does need to be satisfied equally consideration should be whether there are any other public houses in the area. This second factor recognises the role that pubs play in sustaining vibrant communities.
C) Alternative Option: Do not include a policy to protect pubs but rely on a general protection of community facilities policy.	This option would offer less protection and given the high land values of properties in Oxford would inevitably result in the loss of a significant number of public houses.