# Background paper 013

## Liveable city

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| **This paper addresses community and cultural facilities, healthcare, schools, leisure and recreation and retail.** |
| **Relevant Local Plan 2042 Objectives:**<br>• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city.<br>• Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. |
| **Relevant SA Objective(s):**<br>6. To provide accessible essential **services and facilities**. |
| **SEA theme(s):** Material Assets, Human Health |

# 1. Introduction

1.1     This paper focuses on Oxford as a liveable city looking more specifically at the community and cultural facilities that help foster a sense of community and belonging, enhancing health and wellbeing.

1.2     The paper provides a context for considering the subject by providing a brief summary of the relevant national and local plans, policies and programmes that currently exist and will influence change in the future. This paper identifies some of the key challenges and future trends that will impact on these facilities. The paper then explores what would happen without a plan and the potential difficulties that the city would face.

# 2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

## Plans Policies and Programmes

## National Planning Policy Framework (NPPF)

2.1     The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 recognises that this comprises achieving three overarching objectives, which are independent but need to be pursued in mutually supportive ways. These comprise economic, social and environmental objectives. The social objective is required 'to support strong, vibrant and healthy communities, …. and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being' (para 8b); 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of development, and make sufficient provision for:... c) community facilities (such as health, education and cultural infrastructure)' (para 20).  'Non- strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level....' (para 29). Chapter 8 of the framework addresses the promotion of healthy and safe communities suggesting that planning policies and decisions should aim to achieve healthy, inclusive and safe places which 'enable and support healthy lives' (para 96c).

2.2     The framework also states that 'to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities(such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and

other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services' (para 98). Finally the framework suggests that 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed' (para 200).

## Oxford Local Plan 2036

2.3     The Oxford Local Plan 2036 is the current adopted Local Plan.  The policy approach to cultural and community facilities is to make accessible a diverse range of facilities; seek to protect existing facilities; and support improvements and more intensive use of existing sites.   Section 8 contains strong policies to help realise this strategy:

2.4     Policy V7 on infrastructure and cultural and community facilities seeks to improve access to social and community infrastructure in particular from new development and protect and retain existing cultural and community facilities.  The policy also indicates that planning permission will be granted for the alteration and expansion of existing schools, primary healthcare facilities and community centres; and that new schools, primary healthcare facilities and communities centres will receive planning permission where the City Council is satisfied that a number of criteria have been met.

2.5     Policy G5 on existing open space, indoor and outdoor sports and recreation facilities seeks to protect indoor sport and leisure facilities.  The policy also indicates that the City Council will, where the opportunity to do so arises, seek public access to private and institutional facilities (e.g. those owned by colleges and private schools) through sharing schemes and joint user agreements. This is considered further within the Public Open Space and Outdoor Sport topic paper.

## Corporate Plan

2.6     Oxford City's Council's Strategy 2024-28 was approved by the Council's Cabinet in July 2024.  Its five priority areas of focus are:

- Good, affordable homes;

- Strong, fair economy;
- Thriving communities;
- Zero Carbon Oxford; and
- Well-run Council

2.7     To help support thriving communities the Council Strategy aims to focus on areas of highest inequality to improve health, wellbeing, skills and employment opportunities and equal access for everyone.  The priorities are:

- working in partnership with communities, organisations, and agencies to reduce inequalities and create thriving communities
- Championing diversity and inclusion in our own work and community partnerships
- Helping people live healthily by providing services, support, and facilities to prevent and manage physical and mental health conditions

2.8     The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators. In turn the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

Oxford City Council's Thriving Communities Strategy

2.9     The Thriving Communities Strategy 2023-2027 brings together leisure, culture, and Oxford City Council's work with communities to tackle inequalities.  These inequalities are detailed in Oxfordshire's Joint Strategic Needs Assessment (June 2023) which provides information about the county's population and the factors affecting health, wellbeing, and social care needs.  The City Council aims to tackle inequalities by encouraging well-designed neighbourhoods and parks where healthy lifestyles are the norm (sometimes called healthy place shaping), developing skills, ensuring growth is inclusive, strengthening communities and improving access. The strategy is about connectivity and collaboration – ensuring we effectively join up our efforts to help create a more equal city.  The strategy sits alongside the Housing, Homeless and Roughsleeping Strategy, Citizen Experience Strategy, Oxford's Economic Strategy, and the Net Zero Action Plan.

# 3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

## Existing community and leisure facilities
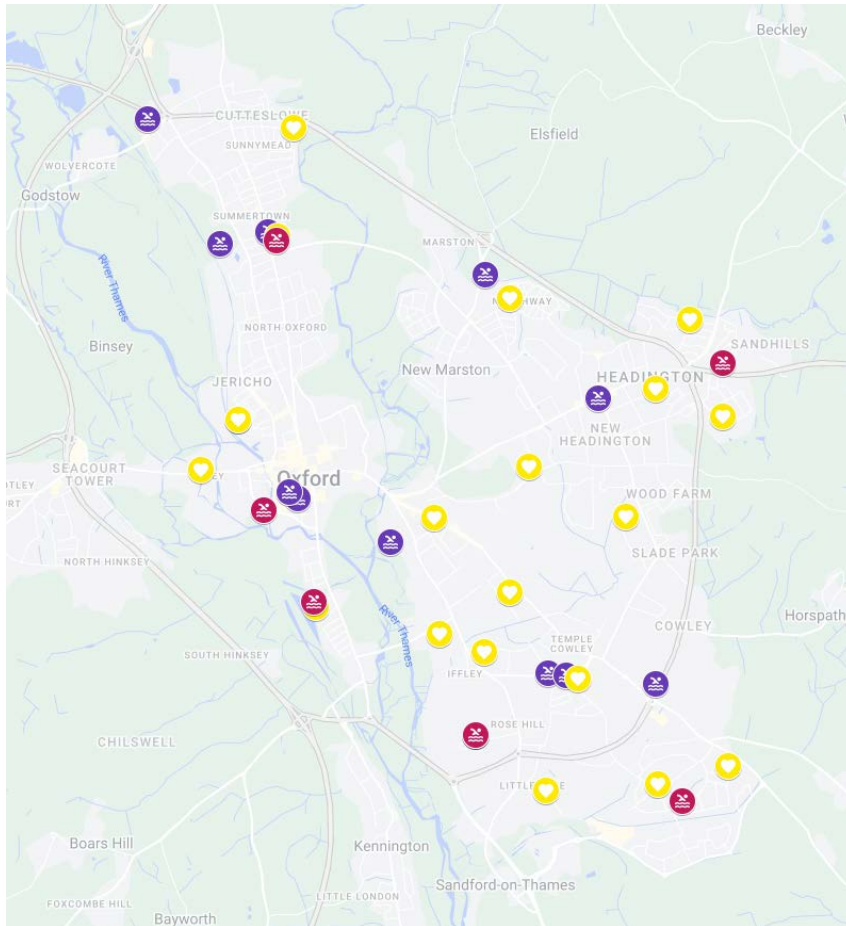
**Figure 1.** Existing community and leisure facilities ([Google, 2024](#))

🔴 City Council leisure centre

🟣 Commercial leisure centre

🟡 Community centre

3.1     Oxford's leisure centres provide a range of indoor sports including swimming pools, gyms, sports halls, crèches, spinning studios, children's soft play, community and group exercise halls and squash courts. A number of these leisure centres operate on a commercial basis (e.g. provide private membership options).  Some leisure centres also provide opportunities for outdoor sports but this is not addressed within this topic paper.

3.2     Oxford City Council Leisure Centre Locations:
- Barton Leisure Centre,
- Ferry Leisure Centre,
- Leys Pools and Leisure Centre,
- Rose Hill Community Centre Gym,
- Hinksey Heated Outdoor Pool,
- Oxford Ice Rink

3.3     There are 23 community centres located across the city owned by the City Council but managed by Community Associations: Barton Neighbourhood Centre, Blackbird Leys, Bullingdon, Cheney, Cuttleslowe, Donnington, East Oxford, Florence Park, Headington, Jericho St Barnabas, Jubilee 77, Littlemore, North Oxford, Northway Sports Centre, Regal, Risinghurst, Rose Hill, South Oxford, The Asian Cultural Centre, The Venue@Cowley, West Oxford, and Wood Farm Community Room.   These community centres offer welfare, educational and recreational activities that residents can get involved in.  These can include health and fitness opportunities (e.g. yoga classes), sports (e.g. judo and dance), dedicated groups/sessions for parents and children and the elderly, junior and youth entertainment (e.g. Scouts and Guides) and religious groups. Tenants are granted community leases subject to a number of criteria being met by applicant organisations.

3.4     In addition to leisure and community centres there are a number of commercial facilities in the City that overlap with leisure. These include cinemas and theatres, public houses (including social enterprise venues), live music- venues, nightclubs, bowling, karting, laser kombat, private leisure centres/ gyms, children's soft play areas (Partyman), escape rooms, indoor golf and cricket and climbing walls.
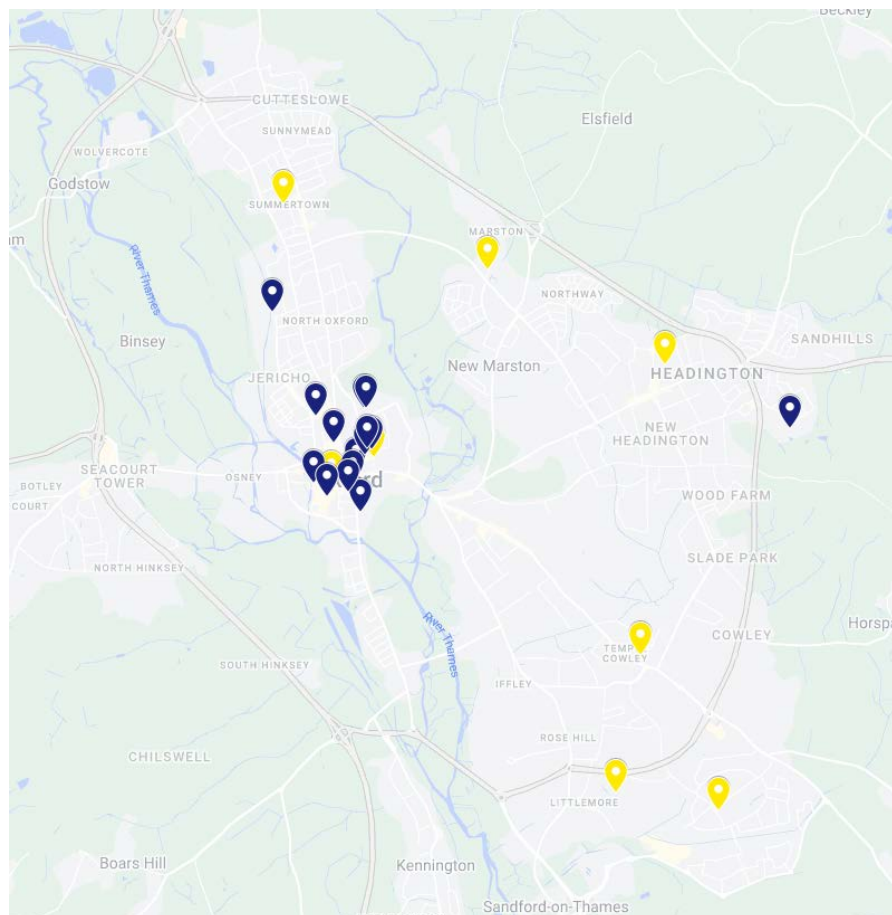


**Figure 2:** Existing Cultural facilities in Oxford (Google 2024)

 Museums and Attractions   Libraries

3.5     Cultural facilities in the city include 8 libraries (Barton, Blackbird Leys, Cowley, Headington, Littlemore, Old Marston, Oxford Westgate and Summertown), 13 museums and numerous places of worship. Some of these facilities are commercial, e.g. 6 theatres.  Oxford City has a rich variety of religious communities. As well as offering dedicated places of worship many of the religious facilities offer opportunity for more general community use in a similar way to community centres e.g. church halls.

3.6     There are also a number of leisure and community facilities across the City's schools and universities which are made available for community use through user agreements.  There are clearly links between leisure and community facilities and infrastructure: further information can be found in the Infrastructure Topic Paper (015).

## Existing Schools and Colleges

3.7     Oxford has over 50 primary schools which are well distributed across the city, allowing easy access to local schools. Secondary schools in Oxford are also distributed fairly evenly across the city, meaning they are also easily in reach of where people live. Secondary schools include Cheney School, Greyfriars Catholic School, Matthew Arnold School (just outside the city boundary, in Botley), Oxford Spires Academy, The Cherwell School, The Oxford Academy, and The Swan School.  In addition, there are a number of public schools across the city. The secondary schools vary considerably in terms of their performance. In 2023 (the most recent year performance comparison information is available for) the Cherwell School had an attainment 8 score of 59.2, well above the English state school average of 46.3. At the other end of the scale, The Oxford Academy had an attainment 8 score of 32.6, which is below average.

## Existing GP practices

3.8     The 2022 Health and Care Act set up new Integrated Care Systems (ICSs) across England, with each ICS having two core parts, an Integrated Care Board (ICB) and an Integrated Care Partnership (ICP). Oxford city is part of the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB).  The ICB decides how to spend the NHS budget and plans how to improve people's health, deliver high quality care and get better value for money.

## Importance of retail to Oxford's economy

3.9     Oxford is a sub-regional centre which provides a wide range of services and facilities to both the city's residents and those living in the sub-regional catchment area. As such it plays an important role in Oxford's economy. The vibrancy and vitality of Oxford's centres needs to be maintained and enhanced in the future to ensure that they can continue to perform their function and continue to make a significant contribution towards the economic, social and environmental objectives for achieving sustainable development. Oxford is a world-class city with a prosperous economy and a historic core that attracts tourists from around the world. The city centre fulfils many functions both regional and local and will continue to be the main focus for retail together with a wide range of leisure and cultural uses.

## Recent changes in shopping habits

3.10    Retail patterns and behaviours have been changing in recent years with a growth in online shopping, which was only accelerated by the impacts of the Covid-19 pandemic. However, market predictions indicated that there will still be an important role of destination shopping where shopping

becomes part of a broader day out linked with eating out and other leisure activities. When online shopping is so easy there must be other draws to encourage people to visit centres.

**Footfall and vacancy rates**

3.11    The continued success of Oxford city centre highly reliant on footfall from tourists, students and office workers, although the impact on spend is not that closely linked to footfall in Oxford, as many of those who usually visit the city centre are not high spenders. For example, students, day tourists and office workers contribute to a lot the footfall in the city centre in normal times, but do not spend very much money. The Authority Monitoring Report 2023/24 shows a city centre footfall comparison of the 2022/23 and the 2023/24 monitoring periods. This comparison shows that for the majority of the year footfall is higher each month during 2023/24 than 2022/23. On average 2023/24 saw more than 100,000 more people per month than in 2023/24. The highest footfall was in August 23, with about 3 million people recorded over that month, surpassing pre-pandemic levels. The vacancy rate of units in the city centre was 5.6% in 2023, compared to an average of 12.5 across the south.  This compares to 12.6% in September 2020.

3.12    Therefore, there are many signs that change can be managed in a way that is bespoke to the city's needs, and that will maintain a successful and vibrant centre. The flexible policies introduced in the Oxford Local Plan 2036 have enabled us to respond to the changing retail scene in a way that is appropriate to Oxford; for example the conversion of the Boswell's department store to a hotel has maintained an active frontage with a restaurant open to the public on the ground floor.

# 4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1    It is important that we continue to protect and enhance the City's existing leisure and community facilities, otherwise there is a risk that these facilities could be lost to or replaced with another land use (e.g. housing).  This could be detrimental not only to people's health but also their wellbeing.  In the absence of a new Local Plan, we would be reliant on the planning policies within the existing Local Plan 2036.  Beyond 2036 it would only be national policies that would offer protection and these may not necessarily be detailed or specific enough to protect the diverse range of leisure and community facilities across the city. It seems that demand for retail and service floorspace in key locations such as the city centre and district centres may reduce and change in the future, reflecting the continued growth in online shopping and changes to working practices.

# 5. Options for Local Plan 2042 policies

5.1    The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 should include several policies to help ensure Oxford remains a

vibrant and liveable city. This will not only be important for delivering upon a number of Local Plan 2042 objectives

- Our neighbourhoods will have the facilities we need to support our daily lives within a short walk from our homes, to support a liveable city.
- We will have thriving local centres that support a variety of uses and foster activity throughout the day and night.
- We value diversity whilst fostering greater inclusivity within our communities.
- We support modal shift, to more sustainable/active forms of transport, including by limiting the need to travel, supporting good bicycle parking facilities and reducing on and off-street car parking where possible across the city.

5.2     The Local Plan 2042 therefore includes proposed policies in response to three topics:

- Focusing town centre uses in existing centres and maintaining activity at ground floor level in these centres
- Protecting and allowing new community, education and cultural facilities.

5.3     For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4     Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

## Policy options set 013a (draft policy C1): Focusing Town Centre Uses in Existing Centres

5.5    Town centre uses include shops, cafes and restaurants, offices, health centres and gyms, which are uses that attract a lot of people. They therefore need to be located in accessible locations and preferably in a cluster so that a variety of needs can be met in one place, making travel simpler and more likely to be by sustainable modes. The uses also then help to support each other and maintain the strength of community centres, helping them thrive.

5.6    The NPPF sets out that there should be a sequential approach to locating new town centre uses based on: centres (city, district and local) first, then edge of centres and only out-of-centre locations where no alternative sites are available. This is to limit the potential for town centre uses to be located in places that may draw people away from established centres, for example to out-of-town retail generally served by car. Town centre uses are defined in the NPPF and include a wide range of uses such as shops, restaurants, gyms, health centres and offices. Applicants would be required to demonstrate how they have applied the sequential approach if they are proposing town centre uses outside the centres, looking at edge of centre first.

5.7    To be able to apply this approach it is necessary to define the centres. Being a compact city, Oxford already has a range of centres that are in easy reach of people across the city. If local centres are defined, these should be considered the same as district centres and the city centre in terms of them being a preferred location for town centre uses. However, the NPPF is very clear that it should not include small parades of shops of purely neighbourhood significance.

5.8    In addition to town centre uses there are other uses that are best suited to highly accessible locations and to mixed-use areas. Other policy approaches and the spatial strategy of the plan may also direct particular uses to centres. The policy approach may treat the hubs of the district centres and city centre differently to local centres.

*Table 5.1: Policy options set 013a: Focusing Town Centre Uses in Existing Centres*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
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| Option a<br>Allow and protect town centre uses in the city centre, and district centres first. | This supports the city centre and district centres and encourages them to be placed at the heart of their communities. This promotes sustainable travel, and helps ensure that facilities are focused in these locations that can be easily reached by sustainable modes. | The wide range of uses allowed in district centres could lead to competing demands or a particular use could become dominant, which may not be that which is most needed by the community (for example student accommodation or hotels). The policy options relating to active frontages, below, will be |

| | The concentration of uses also means various needs can be fulfilled in one trip, encouraging people to stay longer. This approach helps to ensure town centre uses are concentrated in existing centres, where there are already good transport facilities (and other facilities such as public toilets, as well as parking for those who need to use it). | important in mitigating this. Use Class E covers a wide variety of facilities, and it includes healthcare such as GPs. This approach would mean new GP surgeries would be expected to be located in district centres and would need to work through a sequential test to show other options are not feasible, which may limit options for locating GPs. However, it is important that GPs are easily accessible, so this approach is justified. |
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| **Option b**<br>As well as larger district centres, also define local centres. | Local centres are significantly smaller than the district centres, with less variety of uses, but they should be supported as they provide facilities locally in enough variety to serve a range of needs and they help ensure local access. These locations are less likely to be transport hubs and are more tightly woven into residential areas, so may need a slightly different policy approach to district centres. | These local centres vary in character. Defining them as centres means that restaurants and gyms could be introduced into quieter areas and they may attract more people than can easily access the centres. |
| **Option c**<br>Apart from for town centre uses, distinguish between city and district centres and local centres in terms of the other types of uses permitted. For example, do not allow student accommodation in local centres, but in larger centres only (if local centres are defined, according to the NPPF they are 'town centres' and so suitable for all main town centre uses). | This ensures that the uses that are most likely to be unsuitable for smaller centres are concentrated only in larger centres, minimising disruption and negative impacts, whilst still encouraging town centre uses in smaller centres to maintain good access to facilities and services. | This limits sites available for sui generis uses, which might still be popular locally. |
| **Option d** | This increases the range of uses that would be accepted in local centres and increases the | Local centres are small and not as suitable for hotel uses, visitor attractions and student |

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| Do not distinguish between centres at all and allow the same uses in any defined centre. | locations where needs for student accommodation, hotels and visitor and cultural venues could be met. | accommodation. They generally don't have such strong accessibility and uses that attract a lot of people at once and are less compatible with quiet residential areas could create negative impacts. |
| **Option e**<br>Require an impact assessment for retail and leisure proposals outside of centres of a smaller threshold than the default 2,500m2 in the NPPF (currently required in OLP2036 for those of 350m2 or more), demonstrating that there will be no adverse impact on the vitality and viability of the existing centres, and that there is good accessibility by walking, cycling and public transport, and potentially including other criteria such as that there would not be unacceptable harm to adjoining land uses. | In the context of Oxford, a proposal of 2,500m2 is large, and much smaller proposals outside of centres could potentially have negative impacts. This approach would pick up a larger number of proposals, ensuring negative impacts are avoided or mitigated. | This approach involves an oversight of a larger number of retail and leisure proposals. |
| **Option f**<br>Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres. | The NPPF sets out this approach, so there may be no need to repeat it in local policy. | The NPPF references accessibility and connectivity to centres as criteria for assessing proposals but there are no other locally specific criteria. The Local Plan gives the opportunity to define centres and expectations for them. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? - a, a with b, c with a&b, d with a&b, e with a/a&b/a&b&c, f** |

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| **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The NPPF directs town centre uses to town centres. The local plan can define these areas where town centre uses are to be directed. Town centres may or may not include local centres. There are uses that are not town centre uses that may be most suited to accessible locations. The options explore various ways of defining centres and suitable uses. The options relate primarily to criterion 6. Essential facilities, and criterion 12. Economic growth. Also, they are supporting of the air quality/transport criterion, because protecting centres/guiding uses to these areas helps to support a public transport network and helps people access their needs in sustainable ways. There are slightly different approaches within the options, but largely they all represent minor positives, apart from option for no policy which will be neutral. | |

## Policy options set 013b (Draft Policy C2): Maintaining vibrant centres

5.9        As well as considering what types of uses should be permitted in what types of centres, it is necessary to consider how to protect those existing centres so that they remain vibrant and sustain people's local access to facilities and services.

*Table 5.2: Policy options set 013b: Maintaining vibrant centres*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
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| **Option a** Designate frontages in the city centre and all district and local centres and require that a high proportion of this remains as Use Class E on the ground floor. The proportion to be set based on maintaining current thresholds, with some leeway for flexibility. | Having 'active' uses at the ground floor helps maintain the vibrancy of centres. Commercial, business and services are uses that attract a lot of people, so these are most beneficially located in the centres, where there are good transport connections, and where there is the benefit of people accessing a variety of facilities at the same time. There would still be a lot of flexibility with this approach to have other uses such as housing on the upper floors. | Permitted development rights that allow a change from Use Class E to housing could mean that the policy threshold is breached without any planning permissions being granted, and that would remove any flexibility for the remaining frontage, and limits the potential of the policy to maintain an active frontage. This will need a strong definition of an active frontage. |
| **Option b** Designate frontages in the city centre and all district and local | This approach allows complete flexibility, in the spirit of the change to the Use Class Order. It has flexibility to be applicable whatever future | Because the locations where many commercial uses can be located will be so limited, it is important to try to protect them where they are most suitable. |

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| centres but do not require a proportion to remain as commercial, business and services uses - only set criteria for what is expected in a ground floor frontage to bring activity and vibrancy to centres in terms of design and uses. | changes to the Use Class Order may occur. Criteria can help to ensure that shop fronts contribute to the design and character of existing buildings and their surroundings and give protection to Oxford's historic shopfronts. | Without this protection, there could be a weakening of district centres and the city centre as places where people can access a broad range of facilities at once, and easily, by walking, cycling and public transport. |
| **Option c** Do not designate active frontages. | Checking the proportion of active frontages, or assessing whether a proposal maintains an active frontage, does take some time, which would be avoided with this approach. | This approach does nothing to protect the vitality of local centres, so would not help to achieve the aim of a 15-minute city. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? - a, b or c, or a with elements of b**<br>**High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts<br>**Screened in for detailed appraisal? -** No<br><br>**Rationale:** Key criteria are **6. Services** and **12. Economic growth** (keeping high streets alive), potentially indirect impacts on 11. Urban design. Option a and b are both likely to have a minor positive for criterion 6 and criterion 12 because it would support protecting thriving centres (local and district) and maintaining a vibrant street atmosphere. Option b potentially also might have a minor positive impact against 11. Urban Design because incorporating criteria could include considerations about design of shop fronts and reflecting local character. Option c (no local policy) means no protection and would be scored as a neutral impact (it would not actively make the frontages disappear, just means no further protection through local policy). Overall, these are not scoped in for detailed appraisal because impacts are unlikely to be significant. |

# Policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities

5.10    Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

*Table 5.3: Policy options set 013c: Protection and Alteration of Existing Local Community facilities*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
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| **Option a** Protect local shared spaces and community assets with a policy that would resist their loss, unless set criteria can be met, for example they are to be replaced. | This approach recognises the importance of local community assets and shared spaces and that these make a valued contribution to the health and wellbeing of local residents. The starting position is that these should be protected from loss. The approach recognises that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate market-led research and evidence to be provided to underline this case. Promoting 15-minute city concepts is a key aspiration for the Local Plan, defining accessibility in these terms will help to ensure that any re-provision does not force people to use less sustainable modes of transport to continue to use the facility (e.g. car). | It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need or overriding demand. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations. |

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| **Option b** Include a policy where planning will be granted for alteration and expansion of existing local community assets with relevant evidence from market research, although potentially preventing F2 shops from expanding so they become Use Class E and could be lost to housing or other commercial uses. | This would recognise the particular importance of community assets to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service. | The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit. |
| **Option c** Do not have a policy protecting local community assets - rely on national policy, or future national development management policies. | The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support communities. It highlights the importance of achieving healthy, inclusive and safe places which 'enable and support healthy lifestyles' and 'promote social interaction'. It is likely that new national development management policies could set out a framework for when loss of facilities is acceptable and may make a local policy redundant. | This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? -** **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No |

**Rationale:** With the absence of a specific national policy, it would be appropriate to consider having a policy. The local context supports the inclusion of such a policy, with several potential approaches for its formulation. The options under consideration by the Council explore different strategies for protecting and modifying existing community facilities. These approaches aim to safeguard these facilities, ensuring they are preserved unless it can be demonstrated that they are no longer needed or that a suitable replacement exists.

In terms of sustainability impacts, the different options all score against **criterion 5. inequalities** and **criterion 6. services and facilities** and the level of sustainability impact is unlikely to vary significantly between the options. Option a would have a neutral impact as it offers a cohesive approach to protecting existing local community facilities and outlines a strict criterion which needs to be met in order for the loss of a facility. However, there is still a chance that a community facility could be lost which poses social inequality and health threats, outlined in criterion 5, as communities won't have easily accessible facilities to socialise and exercise. Option b offers a minor positive impact as there is opportunity to expand and alter existing facilities without the risk of development becoming all Class E, preventing the loss of community facilities to housing and commercial use. This also limits the likelihood of social and health inequalities occurring. Option c would have a neutral impact as it would rely on national policy. Although there is no direct national policy, the NPPF does promote healthy and safe communities - it just doesn't outline how to achieve this. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

## Policy options set 013d (proposed policy C3): Provision of New Local Community Facilities

5.11    Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

*Table 5.4: Policy options set 013d: Provision of New Local Community Facilities*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
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| **Option a** Generally, support the provision of new local | These facilities can form an important part of the social fabric of an area, and can support positive health and wellbeing both physical and | Whilst this option would support provision, it would not define exactly what is needed and where. Community assets would not always automatically |

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| community assets in the city. These should be in an accessible location by walking, cycling and public transport. | mental. In combination with option A of Protection and Alteration options above, which seeks to protect existing space, this option would support new facilities coming forward where these would make a positive contribution to the city. Promoting active travel through walking/cycling as part of an accessible city is a key aspiration in the Local Plan. | be approved, which would be because they were not suitable, but which may limit opportunities. |
| **Option b** Seek to secure community use agreements on all new community and leisure facilities, particularly those within schools and colleges, as well as existing facilities that come forward for redevelopment. | There are a range of private sports facilities in the city which offer limited public use as well as those that are entirely restricted to members of those institutions, including schools and colleges. Where access is opened up to the wider community, this could help improve the range of access to facilities. | Management and operational requirements of certain private facilities, such as those belonging to schools and colleges may restrict wider access for safety/ security reasons. It is likely that community use agreements would need to be explored on a case-by-case basis. |
| **Option c** Do not have a policy addressing provision of new local community assets; rely on national policy, or future national development management policies. | The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support communities. It highlights the importance of achieving healthy, inclusive and safe places. | This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? -** <br> **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts <br> **Screened in for detailed appraisal? -** No |

**Rationale:** In terms of options, it would be appropriate to consider having a policy as there is no specific national policy or guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy for the provision of new local community facilities.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it allows new facilities to come forward. Option b would also have a slight positive impact as it would ensure public access to new or existing and expanded facilities.  Option c would have a neutral impact as it would rely on national policy. There is no direct national policy, but it does promote healthy and safe communities  Whilst option a represents a cohesive policy approach, some of the options (options b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could be stand alone, it could also be incorporated alongside option b as this would be less likely to stand alone and option c is less likely to be incorporated at all. There is also a sustainability impact link to **criterion 5. inequalities** as option a is trying to encourage new facilities to come forward and option b is looking at opening up access to previously private facilities to the wider community. This can facilitate social inclusion and access to recreational facilities which in turn links to good health. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented.  Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

## Policy options set 013e (proposed policy C4): Protection and Alteration of Learning and Non-residential Institutions

5.12    Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

*Table 5.5: Policy options set 013e: Protection and Alteration of Learning and Non-residential Institutions (including Schools, Libraries and Places of Worship)*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
|---|---|---|
| **Option a** | This approach recognises the importance of learning and other non-residential institutions. | It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that |

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| Protect existing learning and non-residential institutions with a policy that would resist their loss, unless justified by meeting a set of criteria such as that there is no longer a need or it is no longer feasible in that location, and/or that suitable re-provision can be made. | These make a valued contribution to the health and wellbeing of local residents and also are important in learning and skills development, potentially helping overcome inequalities. The starting position is that these should be protected from loss, but this approach is flexible, recognising that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate evidence to be provided to underline this case. | there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations. |
| **Option b**<br>Set out that permission will be granted for alteration and expansion of existing learning and non-residential institutions. | This would recognise the particular importance of learning and non-residential institutions to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service. | The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit. |
| **Option c**<br>Do not have a policy protecting learning and non-residential institutions- rely on national policy, or future national development management policies. | The NPPF does provide support for the provision and use of community facilities (such as public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.  It identifies that planning policies should guard against the unnecessary loss or valued services and facilities, particularly where this would reduce the communities ability to meet its day-to-day needs.  It is likely that new national development management policies could set out a framework for when loss of facilities is | This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand. |

| | acceptable and may make a local policy redundant. | |
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| Initial sustainability appraisal screening of options sets |
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| **Is there only one option or are there various options we could take? - a, b, a and b, or c**<br>**High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts.<br>**Screened in for detailed appraisal? -**No<br><br>**Rationale:** The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for educational infrastructure (paragraph 20).  Previous evidence suggests that it is likely that need over the plan period can be met on existing sites, but it will be important that sites ae protected. The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing learning and non-residential institutions.<br><br>In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and **criterion 5 to reduce poverty, social exclusion and health inequalities**. The level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it protects existing uses in most cases. Option b would also have a slight positive impact as it would support expansion of existing facilities.  Option c could have a negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost. |

## Policy options set 013f (proposed policy C4): Provision of New Learning and Non-Residential Institutions

5.13     Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

*Table 5.6: Policy options set 013f: Provision of New Learning and Non-Residential Institutions*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
|---|---|---|
| **Option a**<br>Include criteria for assessing the suitability of proposals for | Whilst these uses will always bring benefits to the community, there is potential for them to be sited in unsuitable locations, where traffic is | This could prevent much needed uses coming forward if the site is assessed as not suitable. |

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| learning and non-residential institutions such as schools, with criteria for assessing the suitability of unallocated sites that may be proposed for these uses, which will include issues such as likely impacts on amenity and traffic and whether they can be mitigated, including access, accessibility, size of site and neighbouring uses. | generated, where there are problems with access or it causes disruption to local residents; this approach would prevent that happening. | |
| **Option b**<br>Restrict the locations where these uses would be allowed, for example to defined centres only, or to arterial roads and centres. | Some broad location types will, by their nature, be more likely to be suited to this kind of use, and this policy approach is upfront about those, reducing the need to assess against broad critiera. | This may rule out sites which would be very suitable for these beneficial uses. |
| **Option c**<br>Do not have a policy for provision of new learning and non-residential institutions. | These uses bring benefits for the community, and this approach maximises the flexibility for them to be brought forward, in any location (suitable as long as other policy requirements are met). | This could lead to proposals in unsuitable locations, which generate traffic, have access issues, which are not close to other facilities for linked trips and which are not as easily accessible. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? - a, b, a and b, or c**<br>**High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts.<br>**Screened in for detailed appraisal? -**No<br><br>**Rationale:** The NPPF says that a positive approach should be taken to meeting communities' needs in terms of education and development that will widen choice in education. However, it is also the case that not all locations are likely to be suitable for this type of development. Options are therefore set out that explore potential policy approaches to new learning and non-residential institutions, that supports them to varying degrees and that also ensures they are in appropriate locations. The options that the |

Council have considered represent various approaches to setting policy for the provision of new learning and non-residential institutions.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inequalities.** The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option c, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Provision of the facilities depends on them coming forward, so all options have a neutral to mildly positive impact.

## Policy options set 013g (Draft Policy C5): Protecting Cultural, Social and Visitor Attractions

5.14    Most cultural venues and visitor attractions such as theatres, nightclubs, pubs, casinos and concert halls are classed in the planning system as 'Sui Generis', which means use cannot switch to or from them without planning permission and proposals can all be considered on their own merits. These attractions can be important to people's experience and enjoyment of the city, both for visitors and residents, which may warrant their protection, with varying needs of flexibility as it will be necessary to respond to changing interests and demand.

*Table 5.7: Policy options set 013g: Protecting Cultural, Social and Visitor Attractions*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
|---|---|---|
| **Option a**<br>Protect cultural, social and visitor attractions in their current use, and include a criteria-based policy that only allows their loss or change to another attraction or community use if justified against a clear set of criteria | This approach would help guard against the loss of valued social, recreational and cultural facilities. 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 near one another. | It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations. |

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| that includes requirements for viability and marketing evidence, or replacement. | | |
| **Option b**<br>Protect cultural, social and visitor attractions for those uses (but not necessary the exact use they are in, for example a cinema could be lost to a pub, or even loss to a community facility could be set out as acceptable in principle). This approach would still include a criteria-based policy that only allows their loss if justified against these. | This approach continues to protect facilities that may be important to people in the local area, or wider area, whilst allowing greater flexibility to respond to changing tastes and demand, for example if visitor numbers to cinemas has fallen so much as to affect their viability, a currently more popular use would be allowed in principle (subject to other policies and criteria being met). | This would mean that facilities such as pubs, which can be very important to local communities, could potentially change to an attraction that may attract more visitors, but which does not perform the same community function. Facilities such as pubs are often not in centres, so their change to another use, which is essentially a new use, could conflict with policies that try to direct these uses that attract lots of people to the defined centres. |
| **Option c**<br>Do not include a policy that protects existing venues. | This approach leaves the market to respond flexibly to demands and market conditions. | This approach would not help guard against the loss of valued facilities and venues. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? - a, a and b or c**<br>**High-level screening conclusion? -** the options are similar to each other and are unlikely significant sustainability impacts.<br>**Screened in for detailed appraisal? -** No<br><br>**Rationale:**<br>The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for cultural infrastructure (paragraph 20). The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing cultural, social and visitor attractions. |

These options most directly relate to criterion **12. Economic growth,** particularly the element that relates to cultural provision and tourism and to **criterion 6. to provide accessible essential services and facilities** and **criterion 5 to reduce poverty, social exclusion and health inequalities**. Having a policy has a minor positive impact, helping to ensure these facilities are protected for the benefits they provide in terms of jobs, attracting visitors to the city and contributing to social and cultural well-being. Option c could have a minor negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.

## Policy options set 013h (Draft Policy C5): Provision of New Cultural, Social and Visitor Attractions

5.15    Related to options set 013g about protecting cultural, social and visitor attractions, this options set considers provision of new attractions – what types and where they might be most suitable, and bring most benefits.

*Table 5.8: Policy options set 013h: Provision of New Cultural, Social and Visitor Attractions*

| Option for policy approach | Potential positive consequences of the approach | Potential negative/neutral consequences of the approach |
|---|---|---|
| **Option a** <br> Provide a criteria-based policy to assess the suitability of proposals, which looks at accessibility, environmental and transport impacts to determine the acceptability of proposals for these uses. This may specifically encourage some Sui Generis uses that are considered will fill gaps in provision or be particularly beneficial. | Potential benefits include prevention of impacts such as congestion and providing economic opportunities from locating new uses in accessible and sustainable locations. | The design of new facilities would need to be carefully considered otherwise there could be a potential for conflict with Oxford's historic assets, which has the potential to undermine the city's historic character. Allows for possibility of locating tourist assets away from existing transport hubs. |
| **Option b** | This approach would continue to encourage new facilities in the most sustainable and | Potentially increases pressure in these centres as so many uses would only be allowed there. That |

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| Allow new cultural, social and visitor attractions in defined centres only. | accessible locations. In these locations, they also have potential to attract people who will use the other existing facilities of these centres and help to support them. This gives further potential to enhance the vibrancy of the city and district centres. | may also limit these facilities because of competition for a limited number of sites. Has the potential to reduce variety of uses in these locations. |
| **Option c**<br>Do not allow new cultural, social or visitor attractions | This could limit the negative impacts of visitors and tourists on Oxford's transport system and communities. | This approach would have a potential negative impact to Oxford's tourism industry and economy. It may not limit visitors, but would just limit their experience. It was also limit opportunities for residents. It could contribute to a decline of the city centre and district centres, with fewer visitors. It would limit opportunities for new attractions that may contribute to the wider understanding and appreciation of Oxford's unique history or increase its accessibility to people and opportunities for enjoyment. |
| **Option d**<br>No Policy. Rely on other policies in the Local Plan and national policies where applicable. | Provides flexibility for the provision of these uses. | Reliant on other policies to mitigate any potential negative impacts on transport, heritage, and wider environment. |

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| **Initial sustainability appraisal screening of options sets** |
| **Is there only one option or are there various options we could take? - a, a & b, b, c, d**<br>**High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts.<br>**Screened in for detailed appraisal? -**No |

**Rationale:** The NPPF says that plans should take into account and support the delivery of local strategies to improve society and cultural well-being. Therefore it is appropriate for options to explore potential policy approaches to support these facilities to varying degrees and that also ensures they are in appropriate locations. Visitor attractions and cultural facilities can attract large numbers of people and therefore have impacts on local amenity, and it is important they are accessible. The options that the Council have considered represent various approaches to setting policy for the provision of new cultural, social and visitor attractions.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inqualities and 12. Economic growth,** particularly the element that relates to cultural provision and tourism. The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option d, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Option c allows no new facilities, but would not affect directly existing facilities, which already ensure a range of provision.

# 6. Conclusions including preferred approaches for Local Plan 2042

6.1     The importance of adequate availability of community and cultural facilities is evident. The functions they provide can be as a meeting place, a place for leisure and fitness, a place for community and interest groups to meet and so on. Cultural community and leisure facilities help to support strong communities, healthy lifestyles, wellbeing, and a sense of community and belonging. There has been a change in the cultural and leisure landscape as a result of Covid-19, which has in some ways perhaps just accelerated changes. The Local Plan 2042 should take a flexible approach that enables the types of facilities needed and that protects or ensures provision. This will help achieve health and wellbeing objectives and help to overcome inequalities.

6.2     The retail and service sector play an important role in Oxford's economy and help to offer a range of job opportunities to local people. The city centre is an important destination for visitors from both overseas and the UK, and is attractive for business trips and conferences. The city centre and district centres provide a diverse range of uses and services, including retail, pubs, restaurants, offices, together with cultural and entertainment venues, which are important to the functioning of a city and people's well-being. These help to meet the needs of local residents, visitors to the city and those working in Oxford. Opportunities for new cultural, community and entertainment uses together with those in the hospitality sector and residential where appropriate could potentially be at the forefront of a renaissance in the city's retail sector.

**6.3     Key sustainability issues for the Local Plan to address in relation to liveable cities**

- Availability of services and facilities plays a key role in quality of life.  The pandemic highlighted the value that people put on facilities in their local areas
- The impacts of permitted development allowed between town centre uses and housing will need to be monitored to see whether it is affecting provision of community and cultural facilities.
- With pressure for housing, it will be important to make a case for the importance of the facilities that support this housing.
- Many commercial facilities suffered during the pandemic and have been affected by rising living and energy costs post the pandemic. Changes may be required to the way services and facilities are operated and delivered. Combined and flexible facilities will be important to help maximise usage and respond to changing demands.
- The city must offer a diverse range of uses services.

## 6.1. Preferred approaches for the Local Plan 2042

6.4     Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address which relate to liveable cities. Under each of these

topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

**Focusing Town Centre Uses in Existing Centres – Proposed policy C1**

6.5     The preferred approach for the Local Plan 2042 is to include a policy that defines the city centre, district centres and local centres. These centres should be the focus for new main town centre uses. There preferred approach is to distinguish between the larger centres and the local centres particularly in terms of student accommodation, which would not be considered suitable in the local centres.

6.6     The preferred approach is therefore a combination of **options A, B, C and E.**

**Active Frontages – Proposed policy C2**

6.7     The preferred approach for this topic is to include a policy that sets thresholds for the proportion of Use Class E (commercial use) to remain at ground floor level, and also to set criteria to ensure an active frontage. Ensuring a level of activity at street level is vital for the continued success of the centres, as is trying to maintain a range of commercial activity.

6.8     The preferred approach is therefore **Option A,** with elements of **Option B.**

**Protection, alteration and new local community facilities – Proposed policy C3**

6.9     The preferred approach for policy addressing community facilities is to generally support new facilities in accessible locations, encouraging community use of facilities if they are private. The preferred approach is also to protect existing facilities unless strict criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities to local communities.

6.10    The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013d and A and B of option set 013c.**

**Protection, alteration and new learning and non-residential institutions – Proposed policy C4**

6.11    The preferred approach for policy addressing learning an non-residential institutions is to generally support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities unless, and to allow alteration and expansion of existing facilities. This approach recognises the importance of

these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

6.12    The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013e and A of option set 013f.**

**Protection, alteration and new learning and non-residential institutions – Proposed policy C5**

6.13    The preferred approach for policy addressing protection, alteration and provision of cultural venues and visitor attractions is to support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities as cultural and visitor attractions (allowing flexibility amongst these types of uses) unless criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

6.14    The preferred approach in the draft Local Plan is therefore a combination of **option A  of option set 013g and A and B of option set 013h.**