

The Local Plan 2045 will be used to ensure Oxford is a fairer, greener and healthier city

OXFORD LOCAL PLAN 2045

OXFORD CITY COUNCIL

Oxford City Council Response to Inspectors' Matters, Issues, and Questions

Matter 9: Local Services and Facilities

Issue 1 - City, District and Local Centres - Policies C1 and C2

Q1 How have the centres in Policy C1, and the frontages in Policy C2 been defined and are they justified, based on proportionate evidence and effective?

Whilst there may be a move to online shopping, our city centre and local centres have been and will continue to be important for people socially. There are also advantages in terms of clustering uses that attract a lot of people in accessible locations. This means a variety of needs can be met in one place, making travel simpler and more likely to be by sustainable modes. Therefore, town centres as key destinations and locations to meet a variety of needs, particularly main town centre uses, need to be protected. The approach to apply a sequential test to locating main town centre uses requires town centres to first be defined. The approach of the plan is also to protect active frontages within the town centres with a threshold percentage of Use Class E. This is to ensure continued activity and interest in these centres so that they continue to support and offer a range of facilities and act as a hub. To apply this approach it is necessary to define the centres and, within those, the active frontages.

The city and district centres are well-established and clear-cut as town centre locations. They all have a wide range of shops, food and drink outlets, offices and community facilities. The boundaries of the centres are drawn to encompass key facilities and to include the mixed-use area, bus stops and car parks, but not to include the transitional area where the commercial and community uses become more sporadic.

The boundaries of the district centres are well-established and no amendments are proposed. The only change has been to move Blackbird Leys centre into the list of local centres rather than to list it as a district centre. This is because its function is very different to the other district centres, being smaller, less commercial, with a lot less active frontage and a much lower proportion of Class E uses.

The Oxford Local Plan 2045 does include a proposed amendment to the City Centre boundary from that established in the Oxford Local Plan 2036. That is to bring Osney Mead into the City Centre. The character of Osney Mead has been gradually changing, particularly as the university have bought more of the area and are moving some functions to it. It has historically operated as a typical industrial estate, but now has a wider and more vibrant mix of uses such as academic facilities and retail. Incorporating the site into the City Centre boundary acknowledges that it expected the area will further evolve as a vibrant mixed-use innovation district as a connected and integral part of the city centre, particularly as a new pedestrian bridge is under construction, that will connect directly to Oxpens. There is also a very small extension of the City Centre the west to encompass the development happening to the western entrance of the station, which effectively expands the station and it would not therefore make sense not to include that new station entrance in the City Centre.

The boundaries of the active frontages are also generally well-established, except for the newly proposed local centres. The active frontages apply to the ground floor only and are drawn along the frontages that are already active frontages. In developing the policy approach regard was had for the existing boundaries and frontages of the 2036 Local Plan and of the regular monitoring visits to the centres which is reported regularly in the Authority Monitoring Report.

Local centres are slightly harder to define, and protections have changed over time, partly in response to changes in national policy. The key considerations for designating these centres are:

- Do they perform more than a local function and are they more than a small parade of shops or purely neighbourhood significance, in accordance with the NPPF definition of a town centre? To understand whether significance is beyond local and whether they are more than a small parade of shops have involved three key considerations:
    - What uses other than shops are present? For example, the local centres include other facilities that attract people to those destinations such as offices, larger community facilities such as community centres and libraries, restaurants and cafes, dentists, health centres, nurseries and so on. Therefore, they clearly have a wider importance and have town centre uses other than shops.
    - Are they in an accessible location that is suitable for locating and intensification of town centre uses? Defined town centres are the locations that are automatically considered suitable, in principle, for town centre uses. Therefore, they must be in accessible locations that are suitable for these uses.
    - What is the local context? For example, some local centres are close to district centres and also busy and vibrant but not quite an integrated part of them. Some small and not very diverse centres that are also close to a district centre are not likely to have a draw beyond the local, but a similar centre that is more isolated from other options will have a much larger draw will go beyond the local.

The boundaries of all local centres are drawn to capture the main town centre uses and back land. Active frontages are defined where there is near continuous active ground floor frontage that includes Use Class E. Local Centres defined on the Policies Map are:

St Clement's	Wide mix of uses, particularly shops, restaurants and cafes, very well connected by bus.
Walton Street and Little Clarendon Street	Busy and well-connected area just outside the City Centre boundary. Variety of uses including academic facilities and student accommodation, shops, pubs, bars and restaurants.
Rose Hill	Well connected with frequent buses along the Iffley Road. Relatively small, but main centre for the area with a large residential population; provides a supermarket, post office, cafes and takeaways, pharmacy, betting shops, estate agents.
North Parade Avenue	Small but busy centre between the city centre and Summertown with a variety of shops, cafes, bars and pubs. Also a popular market every other Saturday. Well connected by bus via the Banbury Road.
Magdalen Road	Well connected, running between the Iffley Road and Cowley Road. Businesses along the street, but with two distinct areas of frontage that defined as the active frontage. Food and drink outlets, shops including groceries, offices, theatre.
New Marston	Relatively small centre, but the main centre for New Marston and Marston area. Buses stop along Marston Road and Headley Way with X3 and hospital routes. Shops including supermarket, food and drink outlets, vet, hairdressers.

Underhill Circus	Small but important centre as the main centre for a relatively wide area with a large residential population. Shops including convenience store and takeaway; main reason it's a centre is the wide range of community functions in the large Barton Neighbourhood Centre including library, community centre, doctor's surgery, meeting rooms, exercise classes and facilities, church, police office.
Blackbird Leys;	Centre is relatively large in area and was previously a district centre. However, rather than being a commercial centre with many main town centre uses, its importance is more for its variety of community uses and as the main centre for the large area of Blackbird Leys. It is very well connected by frequent bus services to the city centre. Uses include the library, church, further education college, community centre, leisure centre, park. The area of retail frontage defined on the OLP2036 Policies Map was not taken forward to the OLP2045 Policies Map because of redevelopment of the centre of Blackbird Leys. This is now near to completion, so a modification is proposed to define the active frontage within the Blackbird Leys Centre, as per the red line: 
Greater Leys	The main centre for Greater Leys, in a busy location where Blackbird Leys can be entered from Greater Leys. It's an important centre for the area and beyond, with a specialist dental practice, health centre, drop and collect post office, pharmacy, offices, a workshop, shops.

High Street East was incorrected listed as a local centre in the Draft Submission Oxford Local Plan 2036. The east of the high street is within the City Centre. Its area of active frontage is separate to the main areas of frontage, but it is defined as City Centre Secondary Frontage. Therefore, High Street east does not need to be a separate local centre designation. A modification is therefore proposed as follows:

Local Centres defined on the Policies Map are: • St Clement's; • Walton Street and Little Clarendon Street; ~~• High Street east;~~ • Rose Hill; • North Parade Avenue; • Magdalen Road • New Marston; • Underhill Circus; • Blackbird Leys; and • Greater Leys.

The approach to town centres and active frontages is justified and is necessary in order to ensure that the NPPF approach to town centres and main town centre uses can be followed. In order to apply the sequential test for main town centre uses set out in Paragraph 91 of the NPPF, it is necessary to define centres.

Paragraph 90 of the NPPF says that 'Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.' Criterion a) says that planning policies should define a network and hierarchy of town centres and promote their long-term viability- by allowing them to grow and diversity in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflect their distinctive characters...'

Policy options sets 013a and 013b in Background paper 013: Liveable city (BGP.001n) set out some of the considerations in setting the policy approach.

Q2 Does the Plan allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, having regard to anticipated needs for retail, leisure, office and other main town centre uses?

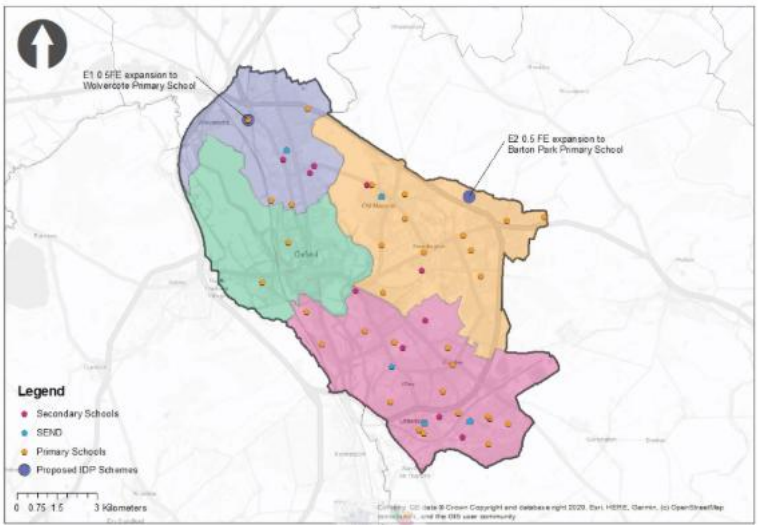
The need for town centre uses is set out in the Oxford Retail, Leisure and Town Centre Needs Study (Stantec, 2023, LIV.001), and in the Oxford Retail, Leisure and Town Centre Needs Study Update (Rapleys, 2025, LIV.002). The update report was commissioned both to reflect the extension of the Plan's end date to 2045 and base date moving forward to 2025, and also to reflect the changing retail landscape in the city as the Botley Road Retail Park continues to transition from a 1980s-style retail park to a 'modern urban science district'. The Botley Road Retail Park's turnover in 2023 showed it as the second most popular retail destination within the City Council administrative area, so it was important to see whether this loss was likely to lead to any changes in need over the Plan period to 2045. The study focused on the need for comparison floorspace. Given that most of the transition had not begun at the start of the Plan period, and that it is still very much underway rather than complete, it is difficult to pinpoint the impact it will have, because behaviours have not yet changed. Additional like-for-like need will not be created in such a straightforward manner. This is explained in section 2 of LIV.002.
LIV.001 identified a positive need for comparison floorspace only after 2033, with negative floorspace requirements arising from 2028-2033. The update in LIV.002 shows a requirement for comparison retail floorspace from 2025 and in each 5 year period to 2045, but most of it being in the final five years. Therefore, the report recommends that forecasts should be kept under regular review. This is important not least because of continued and unpredictable changes in the retail environment. A need for 28,250 sq.m of sales area for comparison goods is identified.
In contrast, LIV.001 actually identifies a significant negative 'requirement' for additional convenience retail floorspace (approximately 33,000 sq.m sales area). The study does not suggest that a negative view should therefore be taken to proposals for new convenience floorspace, as they may be important for supporting new residential developments. However, what is clear is that there is sufficient provision of retail space overall, and if demand for convenience retail does play out in the way predicted in LIV.002 then there is potential for this demand to be met by conversion of convenience retail to comparison retail.

In addition, there are a number of sites identified within district centres and the city centre that have potential or are expected to deliver new retail development, but actually the site owners are currently not finding sufficient demand that will likely drive them to increase retail at those locations, for example Templars Square at the Cowley Centre, and the Clarendon Centre in the City Centre and Diamond Place in Summertown.

Q3 What is the justification for preventing all hot food takeaway uses outside designated centres?

Whilst hot food takeaways are not a main town centre use, this is the most appropriate location for them, as they do attract visitors and should be in the most accessible locations. Furthermore, they already very much focused in these locations, with few incidences outside of them. Trying to restrict them in these areas where there are already many of them would not make sense. However, given the concerns about the potential link between hot food takeaways and childhood obesity, the NPPF introduced paragraph 97. This says that 'Local planning authorities should refuse applications for hot food takeaways and fast food outlets: a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre...'

Oxford is a compact city and this characteristic means that in reality is the vast majority of the city is within walking distance of a school, let alone within walking distance of other places such as parks where children and young people congregate. This map shows just state schools (in addition there are private schools and further education colleges), and clearly shows that the whole city is within the vicinity of a school:



Q4 What is the rationale for requiring applicants to look at edge of centre sites well connected to the town centre in Policy C1, is this intended to apply to all planning applications where the sequential test applies?

This policy approach is considered to be fully in accordance with paragraphs 91 and 92 of the NPPF. Paragraph 91 says that main town centre uses should be located in town centres, then in edge of centre locations and then, only if suitable sites are not available should out of centre sites be considered. Paragraph 92 goes on to clarify that, in relation to edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Policy C1 follows this same approach. The Policy is clear that the sequential approach should be taken to locating new town centre uses. It then clarifies what this means. Policy C1 does not distinguish between edge of centre locations that are accessible or not

accessible. This would be an entirely unnecessary distinction in Oxford, because the nature of the town centres and excellent general accessibility of them means that even locations outside but on the edge of the centres will be accessible locations.

Q5 What is the threshold for impact assessments based on in Policy C1? Is it proportionate and justified?

Paragraph 94 of the NPPF says that retail and leisure development outside of town centres should be required to carry out an impact assessment if the development is over a proportionate, locally set floorspace threshold. The default, if none is set locally, is 2,500m2 of gross floorspace.

The locally set threshold is significantly lower than the default, at 350m2 floorspace. The threshold of 350sq.m is a continuation of the threshold for retail and leisure impact assessments set out in Policy V1 of the Oxford Local Plan 2036 (DPL.001). There is no indication that this threshold has not been appropriate or needs to be altered. The threshold remains above the size of small local shop (280sq.m) according to the Use Class Order.

Large sites in Oxford, even in the defined town centres, are rare. Provision of convenience, comparison, service and leisure units is generally in relatively small units. This is particularly true of the majority of district centres; the only exception being the Cowley Centre District Centre which does have some larger units. The city centre also has some larger units occupied by chain stores, but generally even in the city centre the size of units for convenience, comparison, service and leisure is relatively small.

Major supermarket chains now have very well established smaller convenience store offers (Tesco Express, Sainsbury's Local etc.) sizes vary, but the main supermarkets generally look for a minimum gross floorspace of around 4,000sq.ft (372sq.m). In circumstances where these smaller stores are proposed on the edge or outside of smaller centres they could have a significant adverse impact on their trading performance and overall vitality and viability. This will particularly be the case where centres are dependent on convenience stores to anchor their offer and generate footfall and linked trips/expenditure to the benefit of other shops, services and facilities. Even comparison good national chains with requirement for larger format shops may manage with 5,000sq.ft (463 sq.m), which is significantly below the default threshold.

Therefore, even at 350sq.m, a unit could be in competition with district centres, potentially undermining them, and these centres are vulnerable to increased competition from out-of-centre retail and leisure. An impact assessment becomes necessary at a much lower threshold than the standard default position, and the threshold set just below that at which the major supermarkets would look for a convenience store is an appropriate level.

Q6 How have the thresholds for 'Active Frontages' in Policy C2 been established? Are they justified, even in circumstances where units remain vacant and alternative uses would contribute to the vitality and viability of the centre? And Q7 What is the justification for requiring town centre uses to maintain the thresholds in Policy C2 and promote the vitality of the centre? How would the latter be determined? [answer to both Q6 and Q7 provided below]

Paragraph 90 of the NPPF requires that planning policies and decisions should support the role that town centres play at the heart of communities, by taking a positive approach to their growth, management and adaptation. Town centres should be able to diversity, adapt and have a suitable mix of uses (including housing) that reflects their distinctive characters. The OLP2045's strategy highlights the importance of town centres. The defining of 'Active Frontages' is an important means of ensuring the vitality of the centres is maintained over the Plan period. The thresholds for 'Active Frontages' in Policy C2 have been set to help achieve this.
The thresholds for 'Active Frontages' set out in Policy C2 are based on monitoring data of frontages. The thresholds are all set above current percentages of Use Class E within the defined frontages. These percentages of active frontage in the City and District Centres have held steady over a number of years in accordance with the policies of the Local Plan 2036 and as proposed by Policy C2:

Centre	Use Class E Monitoring Data				
	% Use Class E 2025/26	% Use Class E 2024/25	% Use Class E 2023/24	% Use Class E 2022/23	% Use Class E 2021/22
City Centre Primary Frontage	96.47	95.91	94.74	97	96
City Centre Secondary Frontage	74.27	74.27	75.47	75	75
East Oxford	81.82	80.59	80.11	80	80
Summertown	92.38	92.38	91.26	91	92
Headington	86.84	87.72	87.72	88	87.72
Cowley	87.8	87.8	87.83	88	86.17
Blackbird Leys	58.33	58.33	58.33	58.33	58.33

In terms of the active frontages for Local Centres, the most recent monitoring data illustrates that currently the active frontage percentages are also above those set in Policy C2:

- St Clement's: 72.55
- Walton Street and Little Clarendon Street: 82.22
- Rose Hill: 52.38
- North Parade Avenue: 84.62
- Magdalen Road: 86.5
- New Marston: 60
- Underhill Circus: 75
- Blackbird Leys; 58.33
- Greater Leys.

It is considered that there is a strong policy reason for including a policy addressing active frontages in the Local Plan. Oxford is a city with a strong network of district and local centres which provide a range of facilities for local communities and support and supplement the offer of the city centre. These centres have good accessibility and will be the locations where new town centre uses will be focussed. It is considered that there is strong data supporting the approach and the specific percentages proposed for active frontage at Policy C2. Application of this policy approach through the adopted Local Plan, has proved very successful at maintaining the vibrancy of these centres, even through challenging times for the retail industry on which many of these centres were originally based. This balanced approach offers the flexibility necessary to ensure that this success is maintained.

Issue 2 – Community Facilities – Policies C3, 4, 5

Q1 How would Policy C3 apply to healthcare facilities and proposals for the expansion, replacement or improvement of such facilities?

Policy C3 is not intended to apply to healthcare facilities. The supporting text to Policy C3 makes clear that the policy relates specifically to local community facilities falling within Use Class F.2, whereas healthcare facilities (being Use Class E(e)) are addressed separately in Policy C1 alongside other town centre uses. To avoid any ambiguity, the Council proposes a minor modification to the policy wording so that it explicitly refers to "local community facilities (Use Class F.2)". This would provide greater clarity regarding the scope of the policy and ensure it is clear that proposals for the expansion, replacement or improvement of healthcare facilities are not assessed under Policy C3.

Proposed Modification to Policy C3:

“Planning permission will be granted for new local community facilities (Use Class F.2) and the improvement and expansion of existing facilities where the City Council is satisfied that the following criteria are met:...”

Q2 What is the justification for restricting the expansion of local shops in Policy C3?

The expansion of local shops in Policy C3 is only restricted if the expansion would be sufficient to expand the shop to the degree it no longer meets the definition of a local shop in the Use Class Order. If an isolated shop (with no other such facility within 1,000m2) is no more than 280m2 then it is within Use Class F.2 and is therefore protected within that use. If it is larger than that it falls into Use Class E, which is a very broad range of commercial uses. Therefore, it can be lost to another commercial use as permitted development and the locally important facility could be lost. Therefore, it is justified that the Policy C3 aims to prevent this scenario, in order to protect local shops which are highly valued by local communities and contribute to the plan objective of supporting a ‘liveable city’.

Q3 What is meant by Policy C4(d), which states that “Where possible, joint user and shared user agreements are made”? Is this requirement effective for development proposals at the planning application stage?

This continues a long-standing approach which has been effective in Oxford. However, it is important there is a degree of flexibility, rather than it being an absolute requirement. This recognises that there are schemes where it will not be possible to have joint user and shared user agreements, because of the nature and sensitivities of the proposed use. However, it is important that, where it is possible, joint user and shared user agreements are made. This is traditionally an extremely important means of delivering extra capacity of facilities in Oxford. Being a constrained city, with many demands for a range of uses, but with many private

facilities which could be made more widely accessible, ensuring this wider use helps to make the most efficient use of facilities and land and securing benefits for all.

Q4 What is the justification for disapplying Policy C4 to universities? What other Local Plan policies would apply to proposals for their expansion?

The Local Plan makes alternative and specific provision for the universities as the issues related to university growth are quite different to those associated with the institutions addressed under Policy C4. The universities operate within their own campuses and land and the wider impacts addressed under Policy C4 do not directly apply in the same way. Instead, a bespoke policy approach at Policies H8 and H9 apply to the universities. H8 makes provision for student accommodation linked to the universities and Policy H9 supports the delivery of new academic facilities at the universities where the link is clear on how an increase in students would be accommodated. In addition, there are site allocation policies related to the university campuses where site specific detail is provided. As such Policy C4 is explicit in making it clear that it does not apply to the universities.

Q5 Does Policy C5 apply to sites allocated for mixed-use developments?

Yes, Policy C5 applies to mixed-use developments. This is demonstrated by Policy SPS13 (Ozone Leisure Park and Minchery Farmhouse), which allocates the site for a mix of uses and explicitly references the requirements of Policy C5 in relation to the re-provision of community commercial leisure uses.