

Town Centre Strategy and Needs Assessment

Volume 1: Main Report

Prepared for:

West Oxfordshire District Council

March 2025

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Prepared by:

Steve Norris

Signed:

A handwritten signature in grey ink, appearing to read 'Steve Norris', with a stylized flourish at the end.

For and on behalf of Lambert Smith Hampton

Issued: March 2025

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1. INTRODUCTION

1. West Oxfordshire District Council (hereafter referred to as ‘the Council’) commissioned Lambert Smith Hampton (LSH) in August 2024 to prepare the ‘Town Centre Strategy and Needs Assessment (TCSNA)’ (the ‘Study’).
2. This Study will provide the robust evidence needed to inform strategic and development management policies for the emerging new Local Plan covering the period up to 2041 particularly in relation to town centre uses across the District’s network of centres. This new Plan will replace the current Local Plan 2031 which was formally adopted in September 2018.
3. The study will assess how much additional retail and commercial leisure floorspace (including food & beverage) is needed within the District over the Local Plan period. The findings of the Study will supersede the Council’s current town centre policy evidence base, including the previous Retail West Oxfordshire Retail Needs Assessment (2012) (‘2012 WORNA’).
4. Other key objectives of the study are to:
 - Advise on the network and hierarchy of Town Centres in West Oxfordshire currently comprising of:
 - Principal Town Centre: Witney
 - Primary Town Centres: Carterton and Chipping Norton
 - Town Centres with a significant tourist role: Burford and Woodstock
 - Provide an indication as to the vitality and viability of the District’s five town centres.
 - Review the extent of current Town Centre boundaries and Primary Shopping Areas (PSA) in the Town Centres.
 - Make recommendations for new floorspace requirements for the comparison and convenience retail sectors, and for the commercial leisure sector in the District over the period to 2041.
 - Advise on retail impact assessment threshold.
 - Provide strategic advice on the future direction of the Town Centres.
5. The study has been prepared in the context of current and emerging local, regional and national development plan policy guidance, as well as other key material considerations; principally the National Planning Policy Framework (NPPF). Where relevant, the study also draws on advice set out in the National Planning Practice Guidance (PPG). Both the NPPF and PPG place significant weight on the development of positive plan-led visions and strategies to help ensure the vitality and viability of town centres (Town centres or centres are defined by the NPPF (Annex 2) as city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres).
6. The study is presented in a series of inter-related Volumes as follows:

- **Volume 2:** comprises the quantitative appendices that inform the economic capacity tables for retail needs.
 - **Volume 3** sets out the findings of the 2025 town centre health check assessments of:
 - Principal Town Centre: Witney
 - Primary Town Centres: Carterton and Chipping Norton
 - Town Centres with a significant tourist role: Burford and Woodstock
 - **Volume 4** presents the weighted results of the household telephone interview survey conducted by NEMS Market Research (NEMS) for this study. Interviews conducted with 1,100 households across a defined Study Area between November and December 2024.
7. This Volume draws on the evidence and research in **Volumes 2-4**. It provides robust policy recommendations to help the Council prepare positive strategies, plans and policies for the growth, management and adaptation of the District's designated town centres over the short, medium and long term to help ensure their future vitality and viability.
8. For ease of reference this Study (**Volume 1**) is divided into the following inter-related sections:
- **Section 2** reviews the national, regional and local planning policy context.
 - **Section 3** highlights some of the key trends that are driving the dynamic changes in the retail and leisure sectors at the national and regional level, and how these trends have shaped (and are likely to shape) the District's urban and retail landscape over the short to long term.
 - **Section 4** summarises the survey-derived market share analysis of shopping patterns for different types of comparison and convenience goods purchases across the defined Catchment Area (see **Volume 2**)
 - **Section 5** sets out the health check methodology.
 - **Section 6** provides a summary assessment of the relative vitality and viability of the main designated town centres.
 - **Section 7** details the key assumptions and findings of the strategic retail capacity assessment for new convenience and comparison goods retailing up to 2041 based on LSH's in-house CREAT^e economic model and drawing on the results of the economic tabulations provided in **Volume 2**.
 - **Section 8** sets out the findings of the commercial leisure need and 'gap' assessment, drawing on the evidence and market research, including the results of the household survey.
 - **Section 9** draws on the previous sections and provides recommendations to help inform the Council's preparation of robust policies and strategies aimed at maintaining and enhancing the vitality and viability, and competitive positions of the District's town centres over the lifetime of the plan.

2. PLANNING POLICY CONTEXT

9. To help inform the preparation of this study, this section provides a summary of the key national, regional and local planning policies pertaining to retail, leisure and other main town centre uses.

NATIONAL PLANNING POLICY & GUIDANCE

National Planning Policy Framework (NPPF)

10. The NPPF was last updated in December 2024 and sets out the Government's planning policies for England. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF must therefore be considered in plan-making and is a material consideration in planning decisions.
11. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The Framework (paragraph 11) sets out the Government's view of what the presumption in favour of sustainable development means in practice. For **plan-making**: "...plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change" (paragraph 11a).
12. Chapter 3 ('**Plan-Making**') of the Framework provides guidance to local authorities on preparing local plans. Paragraph 20 states that policies should set out an overall strategy for the location, scale and quality of development, and make sufficient provision for new sustainable development. It requires that strategic policies should look ahead over a minimum 15-year period from adoption (paragraph 22), *except in relation to town centre development* (see below). In preparing development plans, "*policies should be underpinned by relevant and up-to-date evidence*" (paragraph 32). To ensure the local plans and spatial strategies are relevant they should be reviewed at least once every five years and updated as necessary (paragraph 34).
13. Chapter 7 ('**Ensuring the vitality of town centres**') provides guidance on plan-making and decision-taking for retail and other town centre uses. Paragraph 90 states that "*planning policies and decisions should support the role that town centres play at the heart of local communities*" and sets out criteria that local authorities should consider when preparing planning policies. These include: (a) defining a network and hierarchy of centres; (b) defining the extent of town centres and Primary Shopping Areas (PSAs); (c) retaining and enhancing existing markets; and (d) allocating a range of suitable sites in town centres to meet the sales and type of development likely to be needed, "*looking at least ten years ahead*".
14. Paragraphs 91-95 specifically set out the requirement to apply the sequential and impact tests to determine applications for new retail, leisure and main town centres

that are neither in an existing centre, nor in accordance with an up-to-date development plan.

15. Other Chapters in the NPPF are also relevant to the preparation of this study, and to the Council's plan-making and decision-taking policies for its network and hierarchy of centres. For example, Chapter 8 ('Promoting healthy and safe communities') sets out the need to achieve healthy, inclusive and safe places; including the need to plan positively for the provision and use of shared spaces, community facilities (such as local shops) and other local services to enhance the sustainability of communities and residential environments (paragraph 98a).

Planning Practice Guidance (PPG)

16. The Planning Practice Guidance (PPG) provides specific guidance on plan-making and decision taking for retail, leisure and town centre uses, including guidance on Permitted Development Rights (PDR), Article 4 Directions, and the new Use Classes Order ('UCO') that came into effect on 1st September 2020 (Paragraph: 007 Reference ID: 2b-007-20190722. Also refer to: Town and Country Planning (General Permitted Development) (England) Order 2015, as amended) (also discussed later in this section). The Guidance supports the policies and provisions of the NPPF, placing significant weight on the development of positive plan-led visions and strategies for town centres.
17. In terms of planning for town centres, the PPG states that a wide range of complementary uses can, if suitably located, help to support the vitality and viability of town centres. These include residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. Evening and night-time activities also have the potential to increase economic activity within town centres and provide additional employment opportunities.
18. The PPG (paragraph 004) sets out the importance of evidence-based strategies and visions for town centres to help establish their role and function over the plan period, the need for new retail, leisure and town centre uses, and other interventions. However, given the uncertainty in forecasting long-term retail trends and consumer behaviour, the PPG states that forecasts **"...may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed"** (Paragraph: 004 Reference ID: 2b-004-20190722). In those cases where development cannot be accommodated in town centres, the PPG requires planning authorities to plan positively to identify the most appropriate alternative strategy for meeting the identified need, having regard to the sequential and impact tests (Refer to Paragraph: 005 Reference ID: 2b-005-20190722. Paragraph 010A ID: 2b-010-20190722 also provides a checklist for local planning authorities to consider when applying the sequential test). The PPG also sets out several Key Performance Indicators (KPIs) that *"may be relevant in assessing the health of town centres, and planning for their future"* (Paragraph: 006 Reference ID: 2b-006-20190722).

Use Classes Order & Permitted Development Rights

19. The Government has issued a series of reforms to the planning system since 2020 that are relevant to this study. The reforms principally relate to Permitted Development Rights (PDR) and the Use Classes Order (UCO), alongside the Government's White Paper "Planning for the Future" (published in August 2020) and the 2021 Planning Reform Bill.
20. The new UCO came into effect from 1st September 2020 and is relevant to the Council's plan-making and decision-taking on new retail, leisure and town centre uses. The new UCO amended and revoked a number of use classes under the 1987 Order and has replaced them with much broader use classes. In summary, the main reforms introduced by the new UCO include :
 - a new **Class E (commercial, business and service uses)**: which subsumes the former Use Classes A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafés). It also incorporates: the former Class B1 (commercial, business and service uses), comprising office, research and development and light industry; Class D1(non-residential institutions) in part, comprising medical or health services, clinics, crèches, day nurseries and day centres; and Class D2 (assembly and leisure) in part, comprising gyms or areas for indoor recreation.
 - a new **Class F1 (learning and non-residential institutions)**: which includes some of the former uses under Class D1 (non-residential institutions), including museums, public libraries, art galleries, schools, and places of worship.
 - a new **Class F2 (local community uses)**: which comprises (former Class A1) shops defined as being "...not more than 280 sqm mostly selling essential goods, including food, and at least 1km from another similar shop". This Use Class also includes former Class D2 (assembly and leisure), such as meeting places/halls, indoor/outdoor swimming baths, skating rinks, and outdoor sport and recreation.
 - an extension to the **Sui Generis** uses (which fall outside the specified use classes) to include the former Use Classes A4 (pubs and drinking establishments) and A5 (hot food takeaways). It also incorporates some uses previously classified under D2 (assembly and leisure), including cinemas, concert halls, live music venues, bingo and dance halls.
21. The Government also issued the new PDR on 1st August 2021 (Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021) that permits the change of Class E to Class C3 (residential), subject to prior approval applications. This PDR replaces the two existing commercial to residential PDRs under Class O (office to residential) and Class M (conversion of shops, financial services, betting offices and pay day loan or mixed uses to residential), with a new **Class MA**. In launching the PDR the Government stated that the regulations will give "...greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings" (source: PM: Build, Build,

Build - PM Boris Johnson has announced the most radical reforms to our planning system since the Second World War (Prime Minister's Office, 10 Downing Street, 30/06/2020). The PDR (Class MA) does contain some conditions and limitations, such as: (i) it only applies to buildings that have been vacant for a least three continuous months; and (ii) it does not apply to buildings with a cumulative floorspace of more than 1,500 sqm. Although it does not apply to Listed Buildings, it can be applied in a Conservation Area (subject to an impact assessment if it involves converting the ground floor). Since it was introduced, we are aware some local authorities are planning to bring in new Article 4 restrictions under the GPDO to prevent parts of their area from being converted (including, for example, Westminster City Council and a number of other London Boroughs).

LOCAL PLAN CONTEXT

22. The key planning policy documents and associated policies pertaining to town centres and relevant to the preparation of this study include:
- the **Extant Plan (The West Oxfordshire Local Plan 2031)** that was adopted in September 2018 and sets out the overall planning framework for the district from 2011 to 2031; and
 - the **Emerging Local Plan**: The new Local Plan is currently at the Regulation 18 'plan preparation' stage. The Council undertook early stage consultation in 2022 and 2023 and is now seeking to consult on a series of preferred policy options in late June 2025. This report has been taken into account in the development of those preferred options. Following the consultation, the Council intends to consult on potential development locations in autumn 2025 before publishing a full draft Regulation 19 version of the plan in due course.

Extant Local Plan

23. The **West Oxfordshire Local Plan 2031** sets out a vision of the District in 2031 and provides an overarching framework to guide and deliver that vision. The District's town centres are stated to be vibrant, with vacancy rates much lower than national averages, but require continued investment to face off challenges in the future as shopping habits change and competition increases (paragraph 6.6).
24. Section 6 of the Plan details the economic objectives for the District. Important in the context of this study is **Policy E6 on Town Centres** that states (inter alia):
- Town centres will be supported as the focus for shopping, leisure, community facilities and service.
 - Town centres are defined as follows: Principal Town Centre: Witney; Primary Town Centres: Carterton and Chipping Norton; and Town Centres with a significant tourist role: Burford and Woodstock.
 - The Council will apply the sequential and impact tests set out in the NPPF to new shopping and other town centre development proposals, including office development. Impact assessments will be required for significant proposals (**over 500m² net sales floorspace**) where they are not in a centre or in accordance with a local or neighbourhood development plan.

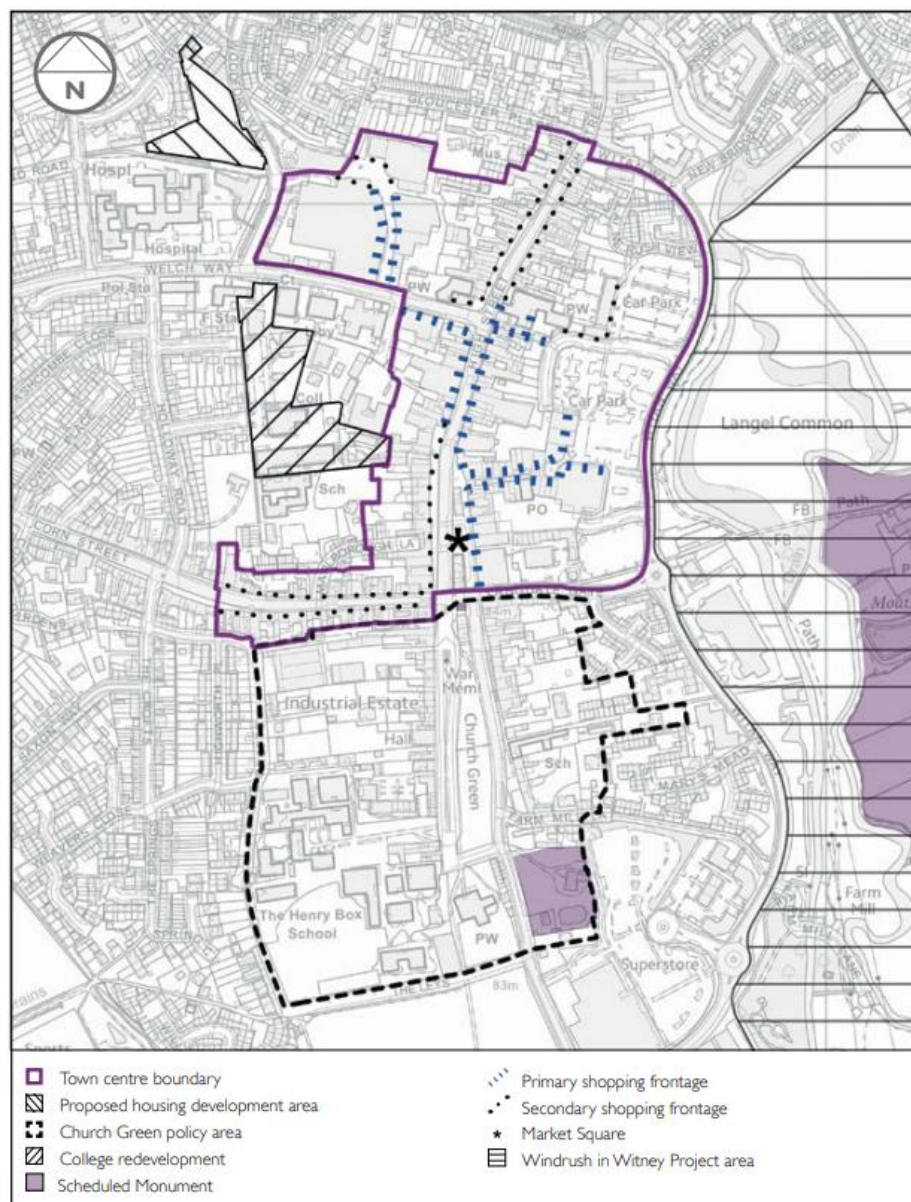
- Primary and secondary shopping frontages are defined on the proposals map in Witney, Carterton and Chipping Norton. Further that within primary shopping frontages development resulting in the loss of shops (A1 use) will be refused unless the criteria set out in this policy can be met in full. And that, within secondary shopping frontages, development proposals for shops and other town centre uses, such as restaurants or cafes, will be allowed where they would complement and enhance the shopping offer of the defined shopping frontage.
- The Council will work in partnership to promote and enhance the attractiveness of all town centre.

25. **Policy E4 on Sustainable tourism** supports tourism and leisure development which utilises and enriches the natural and built environment and existing attractions of West Oxfordshire to the benefit of visitors and local communities. The policy states that the town centre first approach will be applied to tourism and leisure development, including hotels.

26. Specific **Policy WIT5 on the Witney Town Centre Strategy** seeks to maintain and enhance Witney Town Centre providing an accessible, attractive and diverse shopping, visitor and evening economy offer and the principal shopping and leisure destination for West Oxfordshire and the surrounding area through:

- Maintaining a strong and diverse shopping core with a good mix of retailers.
- Promoting the Market Square and Corn Street areas as shopping, leisure and cultural quarters.
- Investigating opportunities for phased, organic extension of the Woolgate shopping centre and at Welch Way.
- Maintaining and enhancing the Market Square as an attractive public space.
- Seeking to raise the profile of Witney as a visitor destination.
- Conserving and enhancing the special interest of the Witney Conservation Area.
- Enhancing the historic market town character and public realm.
- Ensuring the town centre, as a key destination, remains accessible.
- In the Buttercross / Church Green area south of Corn Street and Langdale Gate, the further intensification of shopping or commercial development will be resisted.

Figure 1: Witney Town Centre Strategy: Spatial Area



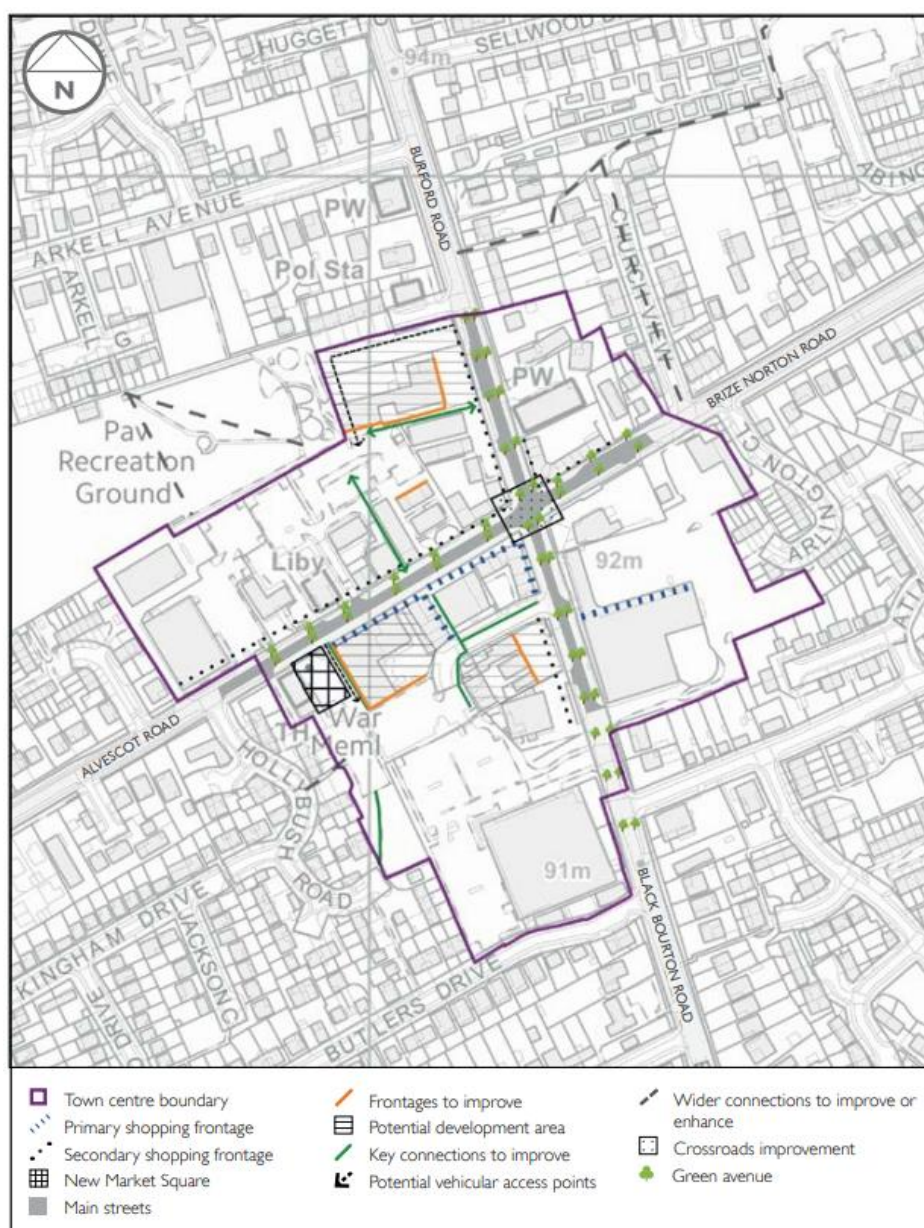
Source: West Oxfordshire Local Plan 2031, page 163

27. **Policy CA4 on the Carterton Town Centre Strategy** seeks to make the centre the local retail centre of choice for those living and working in the town and surrounding village through:

- Providing a wider range of well-integrated shops, eating and drinking establishments, leisure opportunities, public spaces and ancillary town centre facilities including ancillary residential development.
- Creating distinctive and attractive shopping frontages through high quality traditional and contemporary design and landscaping.
- Retaining and providing adequate car parking and provide for improved access.
- A primary shopping frontage is defined to the south side of Alvescot Road and Brize Norton Road to provide a focal point for shopping within the town centre.

- Secondary shopping frontages are defined along the northern side of Alvescot Road, Burford Road and the western side of Black Bourton Road.
- Potential redevelopment of a number of opportunity sites including land on the western side of Burford Road, the southern side of Alvescot Road and the western side of Black Bourton Road.
- The main streets will be promoted as a distinctive tree-lined 'green avenue' with gateway features used to demarcate arrival into the Town Centre.
- Improvements to the main crossroads to facilitate vehicular, pedestrian and cycle movement.
- Improvements to the quality of the public realm.

Figure 2: Carterton Town Centre Strategy: Spatial Area

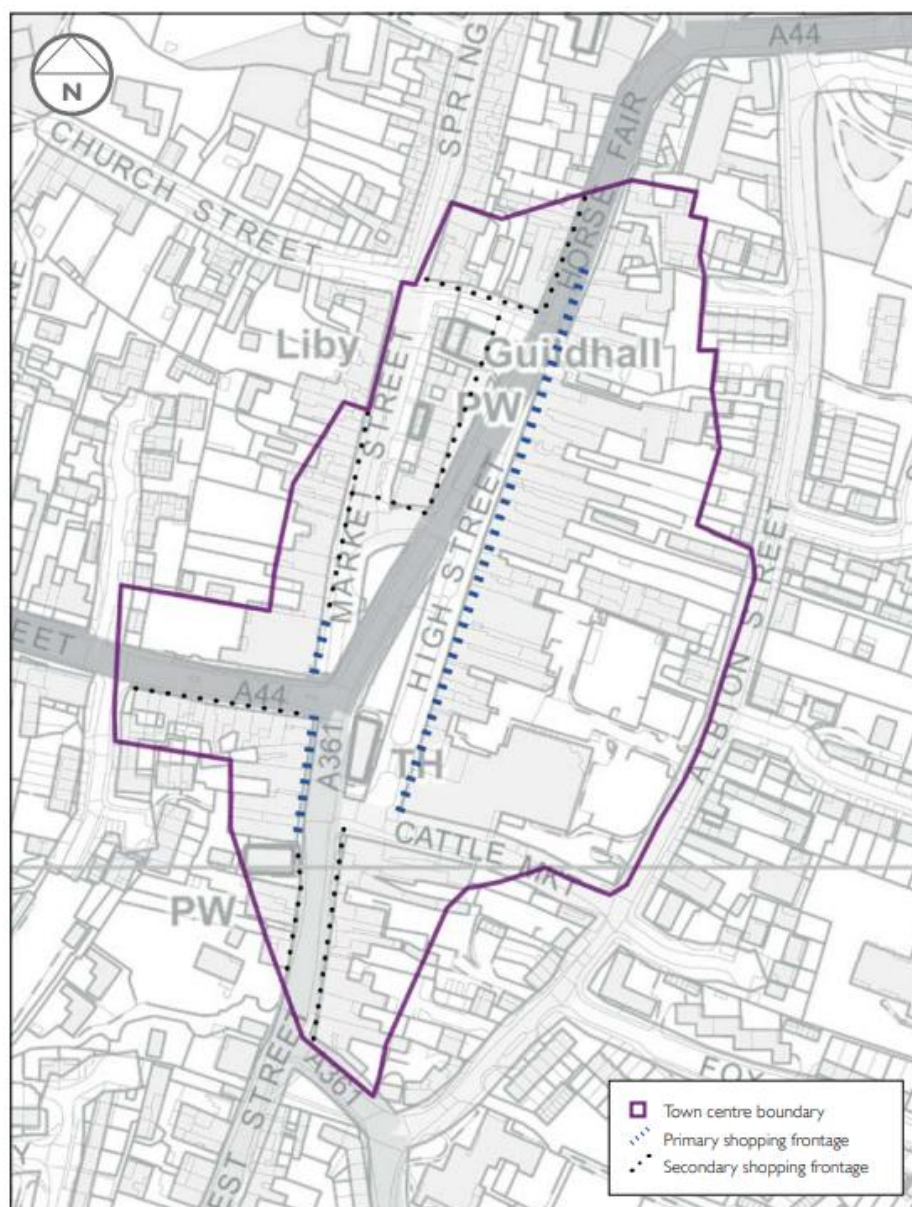


Source: West Oxfordshire Local Plan 2031, page 190

28. **Policy CN2 on the Chipping Norton Sub Area Strategy** states (inter alia):

- The focus of new housing, supporting facilities and additional employment opportunities will be Chipping Norton. New development in the rest of the sub-area will be limited to meeting local community and business needs and will be steered towards the larger villages.
- A strategic mixed-use development area of around 1,200 dwellings on the eastern side of Chipping Norton.
- working with the highway authority, the town council and other partners to reduce the impact of through traffic, especially lorries, upon the town centre and its air quality.
- a stronger town centre with new opportunities for retail and community facilities on land between High Street and Albion Street.

Figure 3: Chipping Norton Town Centre: Spatial Area

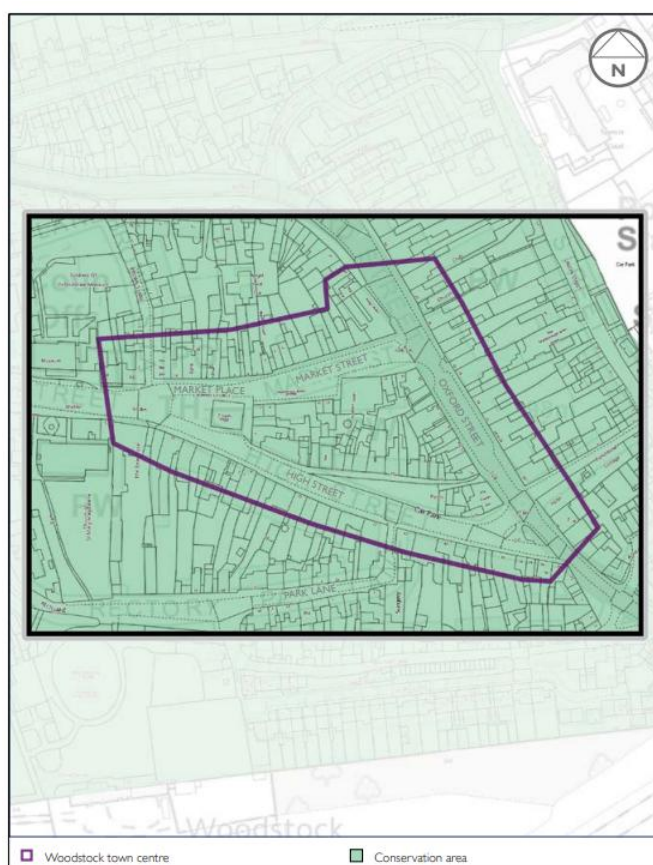


Source: West Oxfordshire Local Plan 2031, page 208

29. **Policy EW10 on the Eynsham – Woodstock Sub-Area Strategy** states (inter alia):

- The focus of new development will be Eynsham, Woodstock, the Oxfordshire Cotswolds Garden Village (now referred to as Salt Cross Garden Village) and Long Hanborough.
- That development in these rural service centres will be of an appropriate scale and type that would help to reinforce/create the service centre role.
- Ensuring Woodstock Town Centre remains vibrant through resisting the loss of shops and other town centre uses and promoting an increase in the availability and efficient use of car parking provision in appropriate locations.

Figure 4: Woodstock Town Centre Boundary

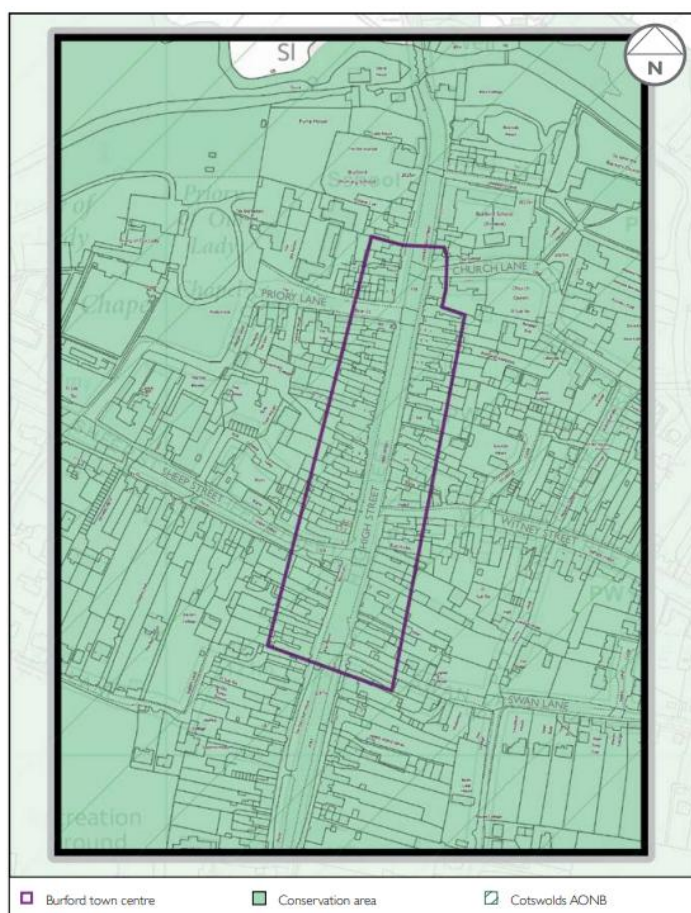


Source: West Oxfordshire Local Plan 2031, page 252

30. **Policy BC1: Burford – Charlbury sub-area strategy** provides (inter alia)

- The focus of new development will be Burford and Charlbury.
- Burford and Charlbury are relatively constrained by their AONB location and are suitable for a modest level of development.
- seeking the retention and development of local services and community facilities throughout the sub-area and ensuring Burford Town Centre remains vibrant through resisting the loss of shops and other town centre uses and promoting an increase in the availability and efficient use of parking provision in appropriate locations.

Figure 5: Burford Town Centre Boundary



Source: West Oxfordshire Local Plan 2031, page 270

Emerging Local Plan

31. As detailed earlier, the Council is in the process of preparing a new Local Plan covering the period up to 2041. The new Local Plan is currently at the Regulation 18 stage with consultations carried out:
 - August 2022 - The purpose of the first consultation paper was to seek early views on the potential scope of the new Local Plan with various open questions posed under six core themes.
 - August 2023 - The second consultation focused on 3 particular aspects:
 - Draft Local Plan objectives – a series of draft plan objectives together with a broad indication of potential policies/policy topics under each;
 - The potential future pattern of development in West Oxfordshire – 8 different spatial strategy type scenarios (e.g. hierarchal, dispersed, new settlement); and
 - A call for sites, ideas and opportunities – an open invitation for suggestions on potential land uses across the District.
32. The Council is now seeking to consult on a series of preferred policy options in late June 2025. This report has been taken into account in the development of

those preferred options. Following the consultation, the Council intends to consult on potential development locations in autumn 2025 before publishing a full draft Regulation 19 version of the plan in due course,

33. We have necessarily referred to the latest consultation outputs that are detailed in the '*Your Place, Your Plan Consultation Summary Report (February 2024)*'. In broad terms, comments from the consultation stress:
 - the importance of revitalising town centres, maintaining or increasing core services, and supporting the viability of smaller settlements, indicating that investments and developments should aim to sustain and benefit these locations (paragraph 3.158);
 - support for putting vacant retail units to residential use, which can also incentivise the revival of town centres and support local economies (paragraph 3.186);
 - the importance of adapting to changing shopping habits and the role of town centres in supporting healthy lifestyles (paragraph 3.187);
 - using high-density development approaches such as high-rise buildings to limit land take and maximize the efficiency of space usage, including suggestions for placing parking underneath buildings and re-purposing town centres, partially for housing (paragraph 3.276);
 - in relation to Carterton specifically, the town centre is considered too small for the current population, and there is a desire for its expansion and revitalisation. The loss of various shops and services over the years is noted, and there is a call for the development of more convenience and dining options, as well as leisure activities like a cinema (paragraph 4.52). Furthermore that a holistic approach to development that addresses current deficiencies in infrastructure and public services, improves transport, revitalises the town centre, and uses land responsibly (paragraph 4.57);
34. In relation to the broad pattern of development: Empty offices – were stated as an opportunity for town centre living (page 83) and that there was no support for new housing estates with their own services as it 'sucks the life out of village/town centres' (page 83).
35. The resulting objectives of relevance to town centre policies are as follows:
 - Objective 17 - To create a safe, welcoming and accessible environment in which West Oxfordshire's town and village centres can adapt and prosper, taking advantage of changing trends and shopping habitats to ensure they remain a destination of choice.
 - Objective 25 - To provide the framework within which the West Oxfordshire economy can thrive and diversify, building on its inherent strengths and capitalising on future growth potential to increase economic productivity, well-being and resilience.
 - Objective 27 - To support West Oxfordshire's existing and future economic assets by providing the right infrastructure, land and premises, enabling them

to improve, expand and adapt as appropriate and ensuring they are not lost to other uses where they have an important economic, social and environmental role to play.

- Objective 30 - To celebrate the rurality of the District, enabling the sustainable growth, expansion and diversification of the rural economy and providing support for farmers and other rural businesses including those linked to the visitor economy.

36. As the Council consults further the outputs of this report will provide the evidence base for retail and town centre matters.

SUMMARY

37. In summary, the underlying objective of national, regional and local plan policy is to maintain and enhance the vitality and viability of town centres, and to promote new sustainable development and economic growth in town centre locations 'first'.
38. This policy objective is even more critical now as town centres and high streets are facing increasing economic challenges. It should also be pointed out that reforms to the planning system issued by the Government including updates and changes to Permitted Development Rights (PDR) and the reform of the Use Classes Order (UCO) with much broader classifications (discussed later) require any policies that reflect the previous UCO classifications to be amended. It should be highlighted the changes have implications for the former designations of primary and secondary shopping frontages, as the control of shopping and service uses is legally less enforceable in commercial areas, as a change of use between Class E does not constitute development and will therefore not require planning permission.
39. Given the current challenges that town centres are facing and the recent changes to national planning policy and guidance, it is important that local policy is relevant and fit for purpose. The extant and emerging policy seek to address key local issues including provision of new homes, employment opportunities and sustainability of town centres. The town centres in West Oxfordshire are set in a rich and historic environment that contribute to their distinctive character and economy and the emerging Local Plan therefore has to set a positive approach. This is with reference to supporting the natural and historic environment; adaptation and change and to ensure the future vitality and vibrancy of its centres by drawing on the findings of this report as evidence base.

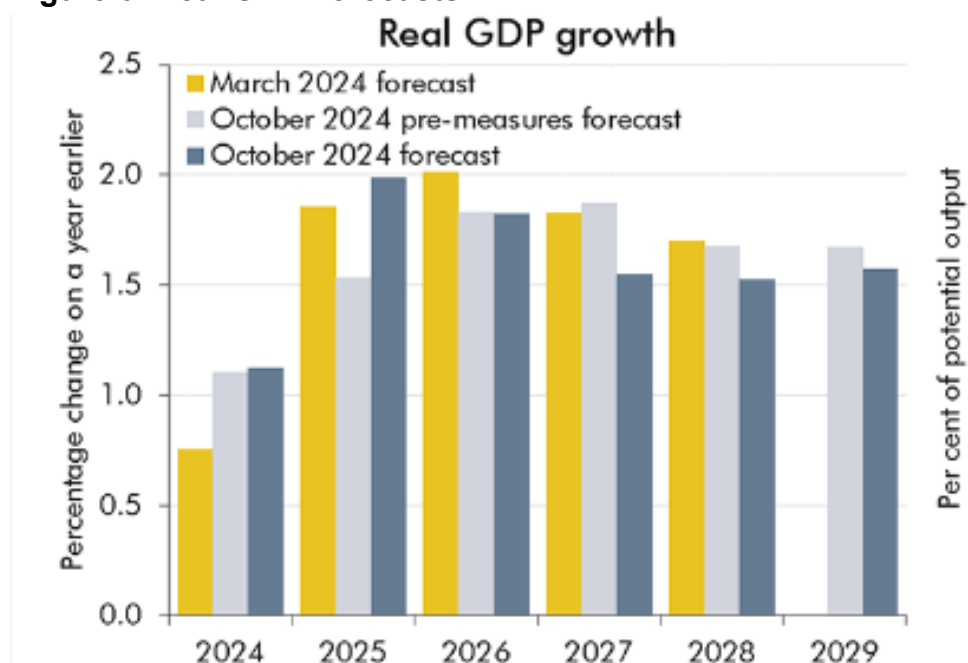
3. TOWN CENTRE TRENDS

40. This section summarises some of the key economic, consumer and property market trends that have driven the changes in the retail and leisure sectors over the last decade and how town centres can respond to these dynamic trends to remain competitive and enhance their overall vitality and viability in the future.
41. The pandemic created one of the toughest trading environments for the retail and leisure sectors and the post pandemic phase has been characterised by low growth, rising inflation and the cost-of-living crisis. This section details the impact of these factors on the commercial retail and leisure market.

UK ECONOMIC OUTLOOK

42. Over the last five years the UK economy has faced significant headwinds from shocks of the pandemic, surging inflation, high energy costs and supply chain disruptions. According to the Office of Budget Responsibility (OBR) (Economic and Fiscal Outlook – October 2024) real GDP growth is forecast to pick up from close to zero in 2023, to 1.1% in 2024, 2% in 2025, and 1.8% in 2026, before falling back to around 1.5% in 2027 with a potential growth rate of 1.7%, over the remainder of the forecast. The new Government's budget policies are expected to temporarily boost output in the near term but leave GDP largely unchanged in five years.

Figure 6: Real GDP Forecasts

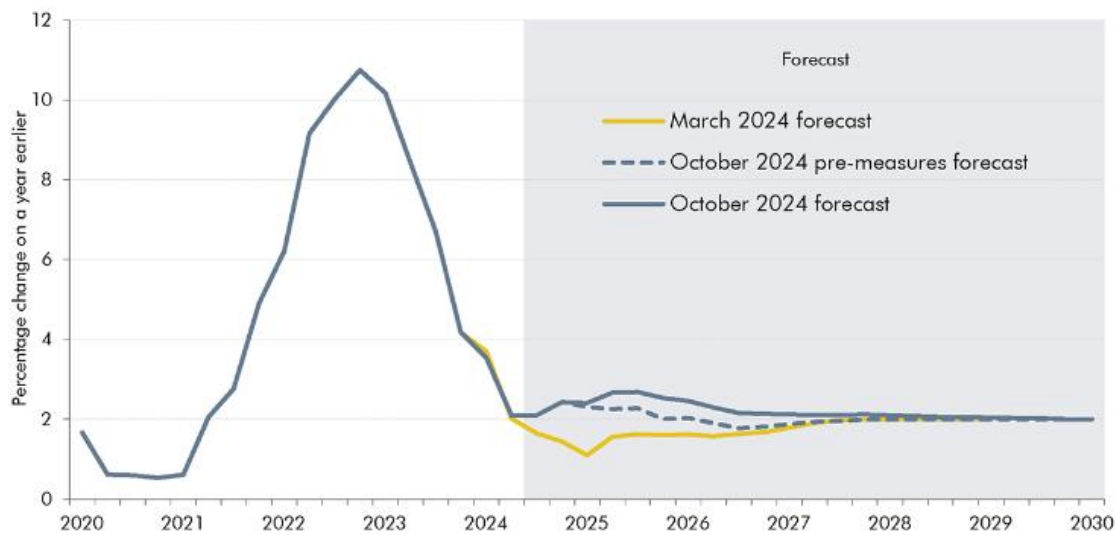


Source: Office for Budget Responsibility - Economic and Fiscal Outlook (October 2024)

43. Consumer Price Inflation (CPI) dropped from a 41-year high of 11.1 per cent in October 2022 to 4.2 per cent in the final quarter of 2023. Having fallen back to around the 2% target in mid-2024, the OB expects CPI inflation to pick up to 2.6%

in 2025 partly due to the direct and indirect impact of the new Budget measures and wider inflationary pressures. Inflation then slowly returns to the 2 per cent target by the forecast horizon as shown below.

Figure 7: CPI Inflation (October 2024)



Source: Office for Budget Responsibility - Economic and Fiscal Outlook (October 2024)

44. Experian Business Strategies (Experian) predicted in their latest Retail Planner Briefing Note 21 (February 2024) ('**RPBN 21**') that GDP growth is expected to accelerate marginally in 2024, compared to 2023, but retail sales growth will take longer to rebound. Spending growth over the course of 2024 will remain affected by the lingering effects of the cost-of-living crisis, as though inflation is slowing towards target, high interest rates continue to constrain household budgets, particularly those with mortgage debt.

RETAIL SPENDING

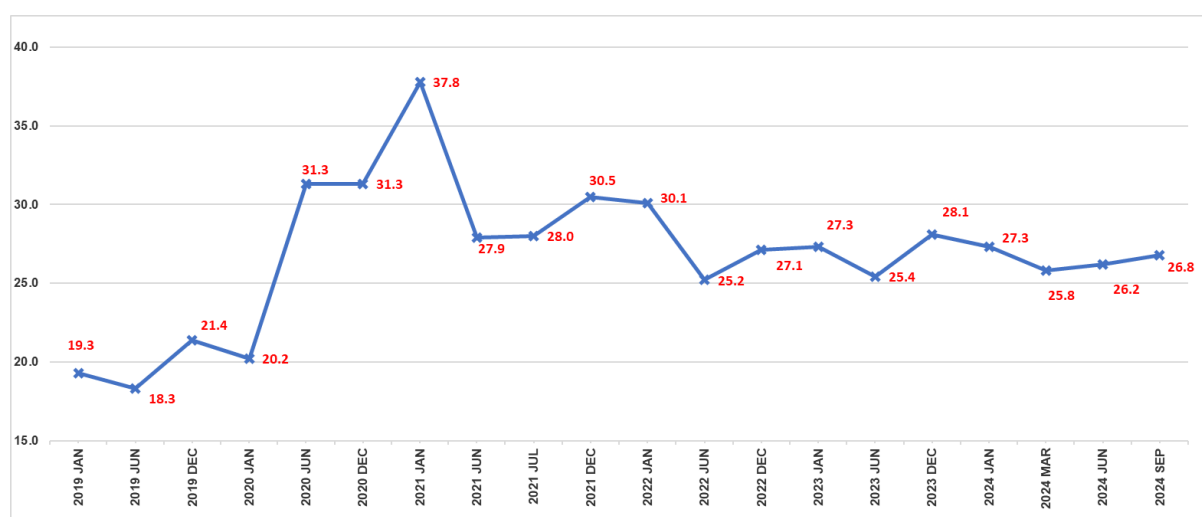
45. The latest Experian forecasts from RPBN 21 for retail spending per capita show:
- **Convenience goods:** The impact of COVID-19 resulted in a significant +8.6% surge in spend per head in 2020 but a contraction of -1.7% in 2021. This followed negative growth of -1.7% between 1998 and 2022. The overall level of negative growth in convenience goods spending has had a significant impact on the grocery sector and on retailer business models. Experian reported a fall in convenience spend in 2023 (-3.0%); 2024 (-0.5%); and 2025 (-0.2%). With no growth projected over the medium term to 2030 and long term "flatlining" at around +0.1% to 2040.
 - **Comparison goods:** Experian figures show negative growth to 2024 (-3.3% in 2023; -1.2% in 2024). The predicted (per capita) growth for 2025 is 2.7% which will settle at around +3.1% to 2030 and falling to +2.8% up to 2040. The longer-term growth forecast is higher than the historic long-term trend (1998-2022) of +2% per annum.

46. These expenditure growth trends, and forecasts, have informed the updated assessments of retail capacity. Clearly any further dampening of growth rates over the short to medium term due to external shocks such as rising inflation and the cost-of-living crisis will have implications for the viability of existing retail businesses and the demand for new space.

ONLINE SHOPPING

47. The growth in non-store retail sales has undoubtedly had the most significant impact on consumer spend and behaviour over the last decade, and on our High Streets and traditional shops. Non-store retailing is commonly referred to as Special Forms of Trading (SFT).
48. This comprises all non-store retail sales made via the internet, mail order, stalls and markets, door-to-door and telephone sales. On-line sales by supermarkets, department stores and catalogue companies are also included in the data collected by the Office for National Statistics (ONS).
49. ONS figures show that as a percentage of total sales, online retail sales accounted for up to 26.8% of sales in September 2024. The graph also shows the steep increase from 20.2% in January 2020 to 37.8% in January 2021. Overall, the trend suggests that since 2020 online accounts for between a quarter to a third of the amount spent on retail goods.

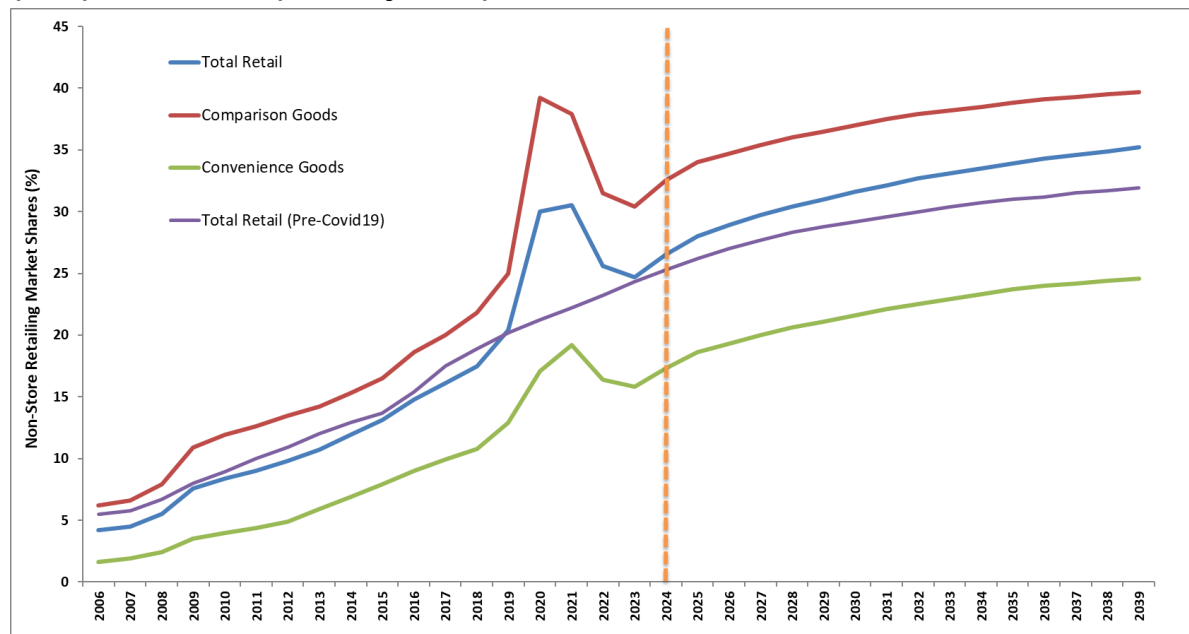
Figure 8: Internet Sales as a Percentage of Total Sales (%) (to September 2024)



Source: ONS: Retail sales, Great Britain: November 2024

50. As the figure below from Experian shows, SFT's overall market share (as a proportion of total UK retail sales) increased from 4.2% in 2006 to 30% in 2020. In other words, online accounted for almost one in every three pounds spent on retail goods in 2020. Of this total non-store retail sales, Experian estimate that comparison and convenience goods retailing achieved market shares of 39.2% and 17.1% respectively in 2020. They further estimate that comparison and convenience goods retailing achieved market shares of 30.4% and 15.8% respectively in 2023.

Figure 9: Estimated and Projected Market Shares of Non-Store Retail Sales (SFT), 2006-2039 (Not Adjusted)



Source: Experian Retail Planner Briefing Note 21 (February 2024)

51. The latest Experian forecasts indicate that total SFT market shares will increase to 35.2% by 2039. Comparison and convenience goods non-store retail sales are forecast to reach 39.7% and 24.6% respectively by 2039.
52. According to Experian, the rising share of internet sales in total retail transactions is the key trend. The ease of online purchasing has also continued to improve rapidly, with technological advances, particularly around smartphones and connectivity. Faster delivery times, including same day delivery, and easier returns processes have also encouraged the trend. The expansion of 5G and fibre networks should ensure the momentum is maintained over the medium term. The proliferation of the buy now pay later business model and price tracker sites is also supporting growth.
53. With the growth predicted in online sales and market shares, it is clear that high streets, town centres and physical retailers will need to work even harder (post-pandemic), medium and long term.
54. In terms of forecasting the potential capacity for new physical retail floorspace, Experian estimate that approximately 25% of all SFT sales for comparison goods and 75% for convenience goods are still sourced through traditional ('bricks-and-mortar') retail space, rather than through 'virtual' stores and/or 'dot com' distribution warehouses. On this basis, Experian adjust their SFT market shares downwards for total retail to 16.8% in 2024, 17.8% by 2025, 20.3% by 2030 and 23.1% by 2039. In line with standard approaches these adjusted / recalibrated market share figures are preferred for retail capacity assessments and used in this assessment.

55. In summary, both retailers and high streets will need to compete for shoppers and expenditure through a variety of means including creating experiences that will attract the interest and attention of potential consumers across all age and socio-economic groupings.

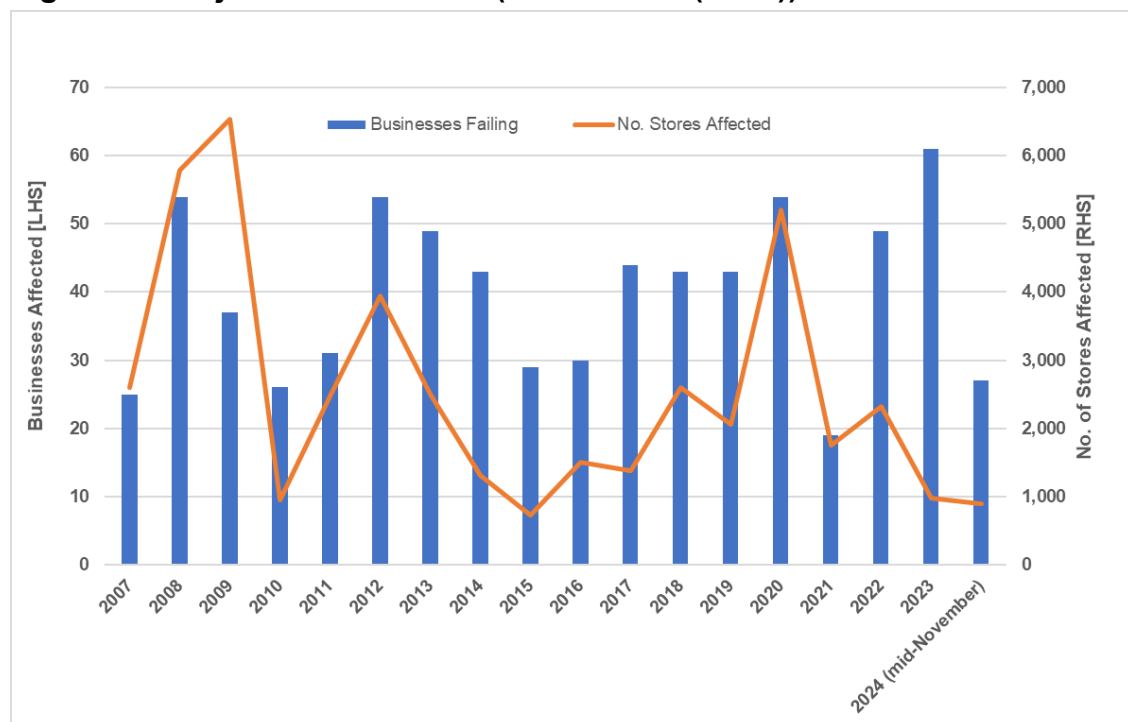
RETAILER BUSINESS MODELS AND REQUIREMENTS

56. The recent challenging economic conditions and growth in online sales have had a significant and permanent impact on consumer shopping and spending behaviour. Retailers in the recent past have faced challenges across the supply chain, inflationary pricing, economic uncertainty and geo-political factors.
57. This has created significant challenges for traditional “bricks-and-mortar” retailing and the high street. Consequently, national multiple retailers are having to constantly review and rapidly adapt their business strategies, requirements and store formats to keep pace with the dynamic changes in the sector and consumer demand. As retailers adjust to “new normal”, a seamless experience and hybrid shopping are shaping the future of retail; the key trends that will impact the industry include:
- Hybrid or ‘Phygital’ (physical and digital) shopping – Retailers want to deliver a seamless experience across all shopping methods, including online, in-store, mobile devices, social media, live streaming and shopping and virtual storefronts.
 - Use of Artificial Intelligence (AI): using AI in augmented chatbots to aid customers with product inquiries, sizing questions, and order tracking, further enhancing the customer experience.
 - Social media sentiment monitoring is collecting and analysing information about a retailer or brand on social media. Actively engaged on social media, retailers are able to better understand data about their customers' sentiments, preferences, and attitudes toward their company and its competitors. Social media and e-commerce are converging, enabling brands, influencers and other sellers to pitch products directly on social platforms in an engaging way, creating stronger consideration and higher conversions to online sales.
 - Physical retail stores and websites are becoming increasingly crucial as sources for additional advertising revenue for retailers.
 - Changes to retail formats and design – retailers are testing different formats as well as including new offerings on the click and collect method such as IKEA opening a store on Oxford Street.
 - Changes in consumer behaviour – the growing trend in repair, recycling, reuse, and thrifting is set to grow. This is seen in the rise of the popularity of second-hand shops, vintage clothing and markets, and charity shops once again.
58. These dynamic trends are best illustrated by the changes in the grocery sector over the last decade. Since 2010, the top 5 main grocery operators have been Tesco, Sainsbury's, Asda, Waitrose and Morrisons who have dramatically changed their business models; their focus has been on growing market share

through online sales and new smaller convenience store formats (including Tesco Express, Sainsbury's Local, Asda Express and Little Waitrose). As a consequence, applications for large store formats have slowed to a virtual standstill over the last decade and extant permissions have not been implemented.

59. Previously outside of the so-called top 5 grocers, the 'deep discount' food operators (namely Aldi and Lidl) have significantly increased their respective market shares through new store openings. Notwithstanding this the grocery and convenience sector has had buoyant sales during the pandemic, particularly in town, district and local centres as many households have been forced to work from home and only the food stores and 'essential stores' have been open during the series of lockdowns, including local independents.
60. The non-food retail sector has also experienced a significant impact from the rise of online shopping over the last decade, which has impacted on business models and store viability. Many well-known retailers have either closed or have significantly reduced their store portfolios.
61. The challenges facing consumers, businesses and town centres continue to intensify. The latest industry research shows that over 971 closed stores in 2023 due to businesses entering administration, with almost 21,000 jobs lost. This compared with 5,200 store closures in 2020, and over 109,000 job losses. The latest (mid-November 2024) indicates a 886 store closures with almost 18,000 job losses.

Figure 10: Major Retail Failures (2007 – 2024 (June))



Source: Centre for Retail Research (November 2024)

62. National retailers with extensive high street store portfolios are struggling to maintain market shares and remain profitable in the increasingly competitive environment. The higher costs of trading from high streets compared with online and out-of-centre retailing, also means that it is not a “level playing field”. This is a further contributing factor to the sizeable number of store closures that have occurred over recent years.
63. In summary, although some retailers are better positioned to cope with the growth in online shopping and the shifts in consumer behaviour and preferences, many are struggling to position themselves quickly enough to absorb rising costs and engineer the vital transition to a more technology-focussed business model. However, the adoption of these technologies by small and medium sized enterprises enables them to reach out to consumers beyond their immediate catchment and to understand consumer preferences and trends better. Notwithstanding this, it is recognised that it is not a level playing field especially in terms of costs for adoption and overall digital literacy.

RISING OCCUPANCY COSTS

64. ‘Bricks and mortar’ retailers are having to absorb higher than inflation increases in year-on-year occupancy costs (for example, rents, business rates, service charges, utility bills, staff costs, etc). This outpaces sales growth for many retailers, eroding profitability and resulting in more store closures.
65. As described above it is not a “level playing field” between high street and online retailing, or between high street and out-of-centre retailing. In response to the budgetary challenges from rising costs and tight margins, retailers will need to drive up efficiencies and productivity from existing floorspace to remain viable.
66. It is standard practice for retail planning assessments to make a reasonable and robust allowance for the year-on-year growth in the average sales densities of existing and new (comparison and convenience) retail floorspace for it to remain vital and viable. However, there is limited evidence detailing actual changes in the turnover and profitability of retailers over time.
67. The latest Retail Planner Briefing Note (RPBN 21) (February 2024) provides forecasts of annual floorspace productivity growth rates based on two different scenarios: (i) the ‘constant floorspace scenario’, based on limited potential for new retail development, resulting in greater efficiency of existing floorspace; and (ii) the ‘changing floorspace scenario’, which takes account of the impact of new retail development on average retailer sales performance. The table below sets out the differences between the two scenarios.

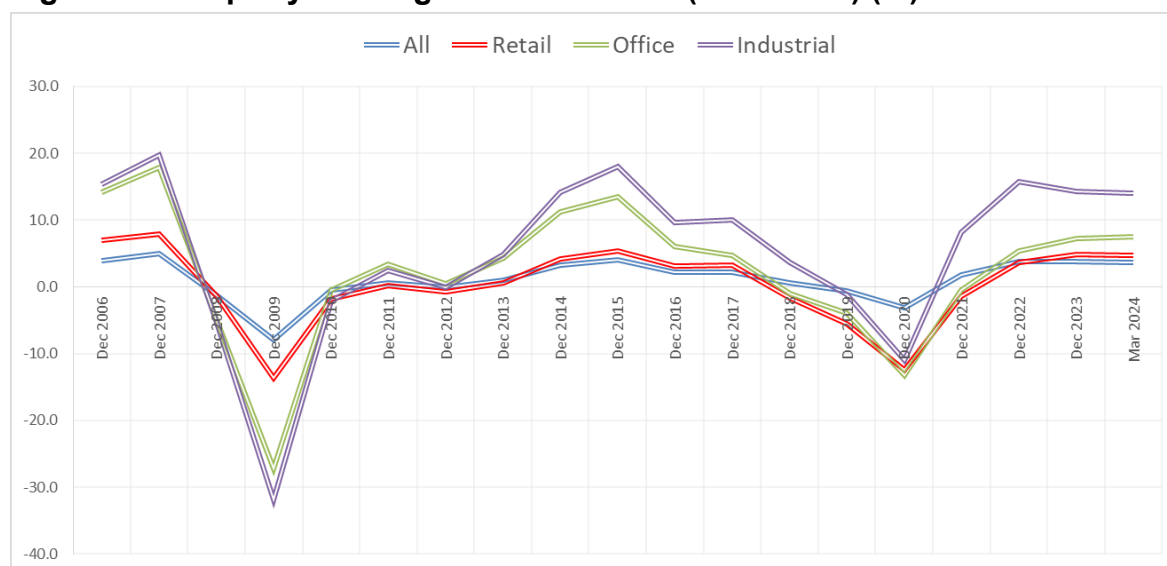
Table 1: Floorspace Productivity Growth Rates (year-on-year growth %)

	2022	2023	2024	2025	2026-2030	2031-2040
CONSTANT FLOORSPACE						
Convenience Goods	-5.9%	-2.5%	-0.6%	-0.2%	0.2%	0.3%
Comparison Goods	4.7%	-1.2%	-2.7%	1.5%	2.8%	2.8%
CHANGING FLOORSPACE						
Convenience Goods	-5.9%	-2.5%	-0.1%	0.0%	0.2%	0.1%
Comparison Goods	4.7%	-1.2%	-2.6%	1.5%	2.6%	2.6%

Source: Experian Retail Planner Briefing Note 21 (February 2024); Figures 3a/3b and 4a/4b

68. As Experian explain, the volatility in sales densities in 2021 and 2022 have been driven by sharp swings in retail spending due to temporary business closures during the pandemic and subsequently the impact of high inflation. Sales density growth rates are expected to be weak in 2024 given the poor near term outlook for retail sales volumes. Budgetary challenges from rising costs and tight margins will be a key factor underpinning floor space efficiencies over the coming years. These results reflect national trends and there will be marked differences between local areas.
69. On this basis, budgetary pressures mean that retailers will have to increase efficiencies from current floorspace including through redevelopment/repurposing of existing floorspace; adoption of modern technology and innovations; more effective marketing strategies; and adopting an ‘omni-channel’ strategy (refers to the integration of different methods of shopping available to consumers e.g. via the internet, in a physical shop, or by phone) that uses internet sales to increase the sales performance of physical shops. This is against a backdrop of weak demand for retail property, high vacancy levels and a significant fall in new retail-led development in centres across the UK.
70. For these reasons we prefer to test higher **‘constant floorspace productivity’** growth rates for retail planning assessments, as they better reflect national trends and the need for existing retailers to increase their sales potential and profit margins to remain viable.
71. Demand for retail space in centres across the UK has fallen dramatically since 2007 and is currently at an all-time low. In turn this fall in demand is impacting on property values and rents. As shown below the retail sector has performed poorly compared with the other property sectors with its origins back to the economic crisis in 2007/08. This trend was exacerbated by the pandemic and the cost of living crisis.

Figure 11: Property: Average Rental Growth (2006-2024) (%)



Source: MSCI UK Quarterly Property Index (May 2024)

72. One of the obvious impacts of the difficulties experienced within the retail sector is the fall in retail rental values. The larger retail groups have enjoyed a particularly strong negotiating position and lease events represent an opportunity to reduce costs and increase flexibility. Over the past eighteen months we have experienced multiple retailers seeking some or all the following lease provisions when agreeing lettings:
- An increase in rentals linked to turnover as opposed to contracted rents linked to market rental value.
 - Where rent reviews are to market value a cap as to the quantum of any future increase.
 - Shorter leases and regular tenant break options.
 - Capped increases to service charge.
 - Pandemic clauses with rent cessation provisions in case of forced closure.
 - Larger incentive packages, including capital contributions.
73. Overall, many centres and shopping locations across the UK simply have too much retail floorspace stock, or they have the “wrong type” of retail floorspace that does not meet the needs of modern national retailers for larger format shop units.
74. LSH’s (April 2024) research together with REVO titled ‘**Places & Spaces Reinvented**’ indicated that high occupancy costs, along with business rates, are consistently identified amongst the top five challenges facing our towns, high streets and shopping centres, alongside an oversupply of retail space and the growth of online retail spend.
75. This over-supply of retail floorspace and limited market demand is placing further pressures on the viability of existing stores and shopping centres. In turn, this makes it difficult for landlords, investors and retailers to justify additional capital expenditure.

OUT-OF-CENTRE RETAILING

76. The development and take-up of food and non-food out-of-centre space has also slowed over recent years, in line with the trends impacting on high streets and town centres. The main grocery retailers have pulled back from new larger format superstore openings in edge and out of centre locations to focus on maintaining and increasing market shares through online sales and opening smaller convenience outlets. The exception to this is the discounters, Aldi and Lidl, who continue to seek new sites in mainly edge and out-of-centre locations.
77. Notwithstanding this, most out-of-centre shopping locations retain their significant competitive advantages over town centres and high streets in terms of their supply of larger format modern outlets, ease of access and ability, their lower occupancy costs, extensive free parking as well as their ability to serve as last-mile delivery hubs. This remains an attractive proposition for those retailers that are still seeking space in the current market. For example, as part of its revised business model Marks & Spencer has closed a number of its traditional high street stores and “replaced” these with ‘Simply Food/Food Hall’ branded stores in out-of-centre locations.
78. The latest Investment Property Forum (IPF) Consensus Forecasts, published in November 2024, predict that shopping centre rental growth will be estimated at 1.4% for 2025. Retail warehouses are forecast to continue outperforming the wider retail sector, with growth of 2.1% predicted for 2025, while standard retail is projected to see growth of 1.9% in 2025.

VACANCY RATES

79. At the end of 2023, the GB national average ‘All Vacancy Rate’ (retail and leisure combined) according to the Local Data Company (LDC) stood at 14% (an increase from 13.8% in 2022). The current rate is still higher than the pre-pandemic (H2 2019) level of 12.1%, so the sector has yet to fully recover.
80. LDC state that over the past five years, retail parks and shopping centres have shown an overall decline in vacancy rates, while high streets have experienced an increase. From a vacancy high of 19.4% in the second quarter of 2021, shopping centres dropped to 17.7% by the final quarter of 2023.

USE CLASSES ORDER & PERMITTED DEVELOPMENT RIGHTS

81. The Government has issued a series of reforms to the planning system since 2020. Effectively, changes to the use classes were brought in to provide a more flexible approach to controlling commercial land uses. This saw the replacement of Use Class A1 to A5, D1 and D2 with E Class (Commercial), F1 (Learning and Non-Residential) and F2 (Local Community Uses) and the restructuring of sui generis uses (public houses, hot food takeaways, cinemas, music venues, bingo etc.).

82. The result of these changes is that what would previously be a change of use under the subsumed use classes is no longer considered development under the Planning Acts and accordingly is no longer subject to planning control. In launching the reforms, the Government announced that the regulations will give “...greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings” (source: Prime Minister’s Office Press Release (30/06/2020) ‘Build, Build, Build’).
83. The impact of the changes will still require the definition of a town centre boundary and a primary shopping area, or a primary ‘commercial’ area to be the foci for E and F Classes. Also, in most instances the former use classes can be ‘translated’ into the equivalent categories within the new E and F Classes. This can assist with the interpretation of policy wording and the effective use of conditions. It is worth noting that under the previous use-class system such categories as convenience, comparison (and bulky) goods fell within the A1 use-class and there is a long-established planning pedigree of reflecting these A1 retail categories effectively in planning conditions.
84. The changes have implications for primary and secondary shopping frontages, as the control of shopping and service uses is legally less enforceable in commercial areas, as a change of use between Class E does not constitute development and will therefore not require planning permission. It should be noted that the effectiveness of frontage policies was declining before the pandemic and previous changes to the UCO. However, there may still be a role to control some sui generis uses in key town centre locations, such as provision of fast-food takeaways, betting shops, payday loan shops or other uses that are justified to be subject to planning control.
85. Hence beyond 2024, town centres are likely to consolidate their retail and shopping role with more emphasis on place and non-transaction uses, this could include high activity-based land uses such as health or education being located in more central locations and stem previous trends of decentralisation.
86. The increase in city living and residential development in town centres is likely to be a growth area in the next 10 years and could be a positive regenerative mandate. We also expect more emphasis on residential upper floor living accompanying ground floor commercial uses. For example, vacant space can be repurposed to rebalance the existing mix of uses, with a greater emphasis on residential, office and leisure.
87. The introduction of Class AA and AB in August 2020 (under the Permitted Development Changes (Amendment No. 2) (2020)), allowing new residential on detached or terrace buildings in commercial or mixed-use areas could potentially lead to the loss of commercial floorspace to residential.
88. Furthermore, the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 (Order) that came into force in April 2021 created a new class of permitted development right (Class MA) into the Town and Country Planning (General Permitted Development) Order 2015

(GPDO) authorising changes of use from Use Class E commercial uses to Use Class (C3) residential. The changes within the Order authorise a change in the permitted use of a property or land from a use falling with Use Class E to Use Class C3 residential use where the property has:

- been in Class E use for 2 years (including time in former uses i.e. A1, A2, A3, B1, D1 or D2 now within that Class); and
- has been vacant for at least 3 continuous months.

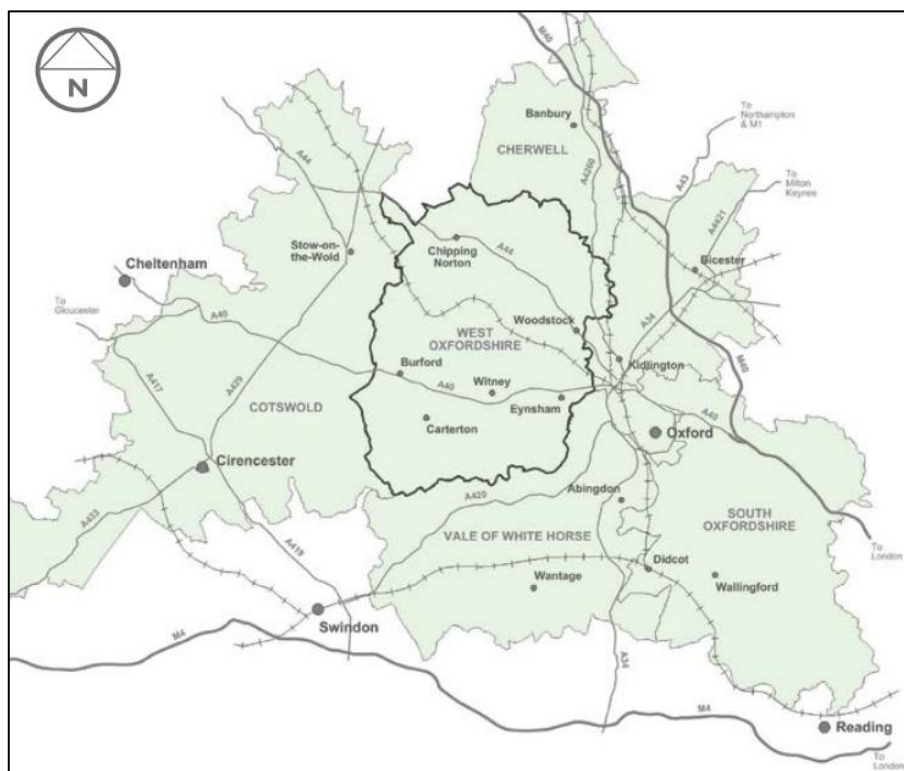
89. These changes replace existing retail, light industrial and office to residential rights with rights applying to all of the relatively recent Use Class E in which those uses now sit. Exercise of the right is subject to prior approval by the local planning authority and therefore would be subject to some planning control. Details must be submitted relating to flooding, transport, contamination, noise amenity, natural light, fire safety and agent of change issues. The area that can be converted is capped, with a maximum size limit of 1,500 sqm of floorspace capable of conversion using the right.

WEST OXFORDSHIRE DISTRICT IN CONTEXT

Location

90. West Oxfordshire covers some 71,494 hectares and is located in in the County of Oxfordshire, bordering Warwickshire, Northamptonshire, Buckinghamshire, Berkshire, Wiltshire and Gloucestershire. The District is a predominantly rural area with one third of the District falling within the Cotswolds National Landscape (an Area of Outstanding Natural Beauty (AONB)).

Figure 12: West Oxfordshire District in Context



Source: West Oxfordshire Local Plan 2031

91. The district's population is spread out over a wide area; however it is mainly concentrated in the towns of Witney and Carterton. Other towns are Burford, Charlbury, Chipping Norton and Woodstock.

Corporate Vision

92. The overarching vision under the Council's Corporate Plan (2023-27) is to ensure that the District is fit for the future through (inter alia) :
- Putting Residents First
 - Enabling a Good Quality of Life for All
 - Creating a Better Environment for People and Wildlife
 - Responding to the Climate and Ecological Emergency
 - Working Together for West Oxfordshire

Figure 13: Council's Corporate Vision



Source: West Oxfordshire District Council Corporate Plan (2023-27)

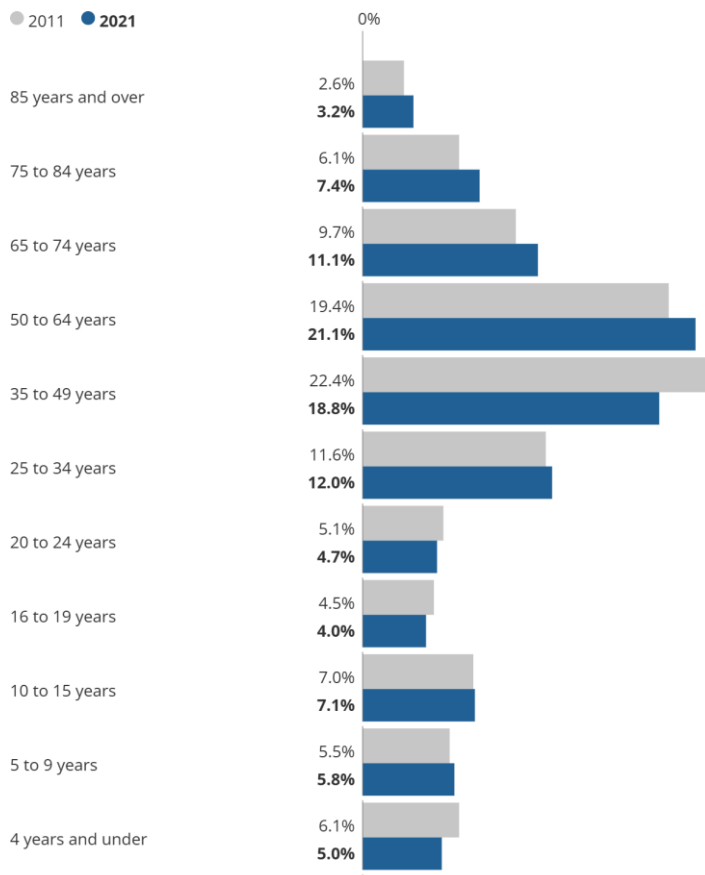
93. West Oxfordshire Council is also a recent recipient of £1m of funding through the UK Shared Prosperity Fund (UKSPF) to '*build, ride in place, improve the places in which people live and support individuals and businesses to thrive.*' Part of the funding is aimed at:
- helping town centres and their businesses to remain vibrant and successful in challenging economic times; and
 - ensuring the District's towns are clean, attractive and welcoming, that they are clearly signed for visitors and that the markets which are so important for footfall are at their best.
94. It is understood that the UKSPF funding has led to £202,760 being allocated to 'Community and Place' with a focus on town centres and high streets, rural services and local green spaces. Specifically, these monies have contributed to a study on the Districts market towns and to help inform the best use of UKSPF funds.

Demographics

95. The demographic profile of the District from the Office of National Statistics (ONS) shows:
- the population of West Oxfordshire increased by 9.0%, from just under 104,800 in 2011 to around 114,200 in 2021.
 - the number of people aged 50 to 64 years rose by around 3,700 (an increase of 18.3%), while the number of residents between 35 and 49 years fell by just over 2,000 (8.7% decrease).
 - The old age dependency ratio in West Oxfordshire in 2021 stood at 0.67 compared to 0.6 in England; and expected to rise in the future.

Figure 14: West Oxfordshire Population Profile (2021)

Percentage of usual residents by age group, **West Oxfordshire**



Source: Office for National Statistics – 2011 Census and Census 2021

Attainment

96. West Oxfordshire has a well-qualified population when compared regionally and nationally. Some 96.6% of the population have at least some qualifications (NVQ+1). The proportion of those with no qualifications is less than half the national average.

Table 2: Qualifications of Working Age Population (2021) (%)

Qualifications	West Oxon	England	South East
No Qualifications	3.4%	7.0%	5.4%
NVQ1+ (e.g., GCSES D-E)	96.6%	93.0%	94.6%
NVQ2+ (e.g., GCSES A*-C)	92.9%	82.5%	84.2%
NVQ3+ (e.g., A-Levels)	82.6%	65.7%	67.4%
NVQ4+ (e.g., Degree)	61.0%	47.3%	48.7%

Source: West Oxfordshire Community Profile (2022)

Employment

97. The largest contributors to the District's employment according to Nomis (2024) are wholesale & retail (14.9%), manufacturing (12.8%); accommodation and food services (10.6%), education (9.6%), human health & social work (9.6%), professional, scientific & technical activities (7.4%). Together these sectors account for over two thirds of the District's employment.

Earnings

98. The District's average (median) earnings for full time workers stand at £749/week which is higher than the GB average of £729.60/week (source: Nomis, 2024).

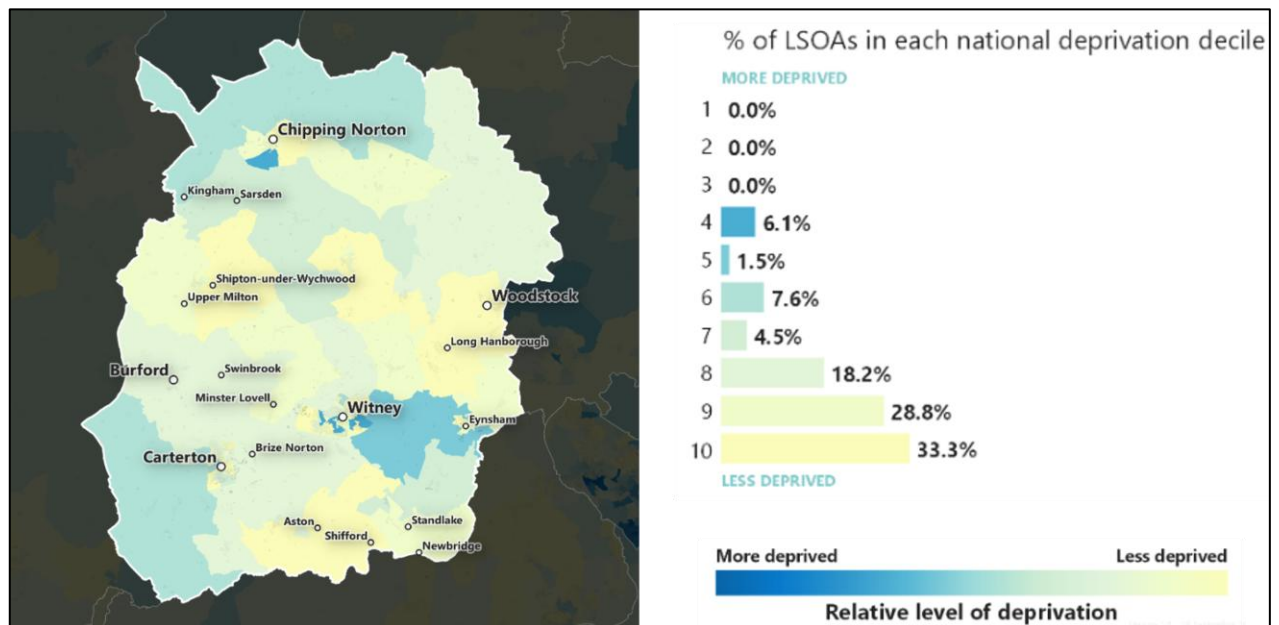
Housing

99. In terms of housing, and in 2020, 40% of households owned their dwelling outright, 29.9% owned their dwelling with a mortgage or a loan, 17.6% were private renters, and 12.6% were social renters. The delivery of more affordable homes is a key priority for the Council and the West Oxfordshire District Council '*2021 Affordable Housing Plan*' recognises a need for 274 new affordable homes per year in order to keep up with demand.
100. Housing in West Oxfordshire is significantly more expensive than the English average. In 2021, the housing affordability ratio (the ratio of average workplace annual earnings to house prices) in West Oxfordshire was 11.4, compared to a ratio of 9.1 in England (source: West Oxfordshire Council Plan 2023-2027 – Your Voice Counts).

Index of Multiple Deprivation

101. The Index of Multiple Deprivation 2019 (IMD) rankings within West Oxfordshire, show parts of Chipping Norton, Eynsham and Cassington, Witney Central, Witney East, Witney North, and Witney South as in the 10% most deprived in the district when compared to other Lower Super Output Areas (LSOAs) nationally.

Figure 15: IMD Within West Oxfordshire



Source: MySociety Based on MHCLG IMD Data

Visitor Economy

102. The Economic Impact of West Oxfordshire's Visitor Economy (December 2023) tourism is an important contributor to the local economy generating the following:
- £234.6m of total visitor spend
 - £263.8m contributing to business turnover
 - 3,595 estimated employed in the sector across the District, representing almost 6% of all employment.
103. Some of the attractions include:
- Blenheim Palace
 - Cotswold Wildlife Park
 - Chipping Norton Theatre
 - the River Thames and
 - the market towns of Witney, Chipping Norton, Burford and Woodstock.

SUMMARY

104. Today, many of our traditional towns and shopping centres simply have too much retail space. The critical challenge over the short, medium and long term will be how to retain existing businesses, fill/replace the voids and attract new investment. The danger is that an increase in long-term vacancies in centres will lead to a 'spiral of decline', which will further engender feelings of neglect and lack of investment confidence in town centres, and "push" more people to shop online.
105. Our towns, traditional high streets and shopping centres have been challenged for more than a decade by falling market demand, rising occupancy costs and

increasing competition from online and out-of-centre shopping. As online spending has increased, the demand for physical retail demand has been impacted.

106. West Oxfordshire is older, less deprived, and more highly qualified than the national average but not immune from national challenges including the aftermath of the pandemic and the cost-of-living crisis. House prices in the District are high making social mobility and affordability key issues for the future.
107. Residential provision in centres is already being encouraged, including by previous national planning changes (such as office to residential conversions through prior approval, and permitted development for two flats above a shop), and through emerging local development plan policy. As a result of the increasing drive towards more flexible planning through changes to the Use Classes Order and Permitted Development Rights, there will inevitably be more mixed-uses within centres particularly residential, and this should be encouraged and planned for through enabling planning policies.
108. It will be important to maximise intergenerational residential provision in the most sustainable locations, particularly in centres, as part of a balanced mix of uses. Therefore, consideration needs to be given to planning policies and allocations enabling the growth of other uses, such as education, leisure and recreation, within centres, which, along with residential, are particularly positive in terms of enhancing the vitality of centres.

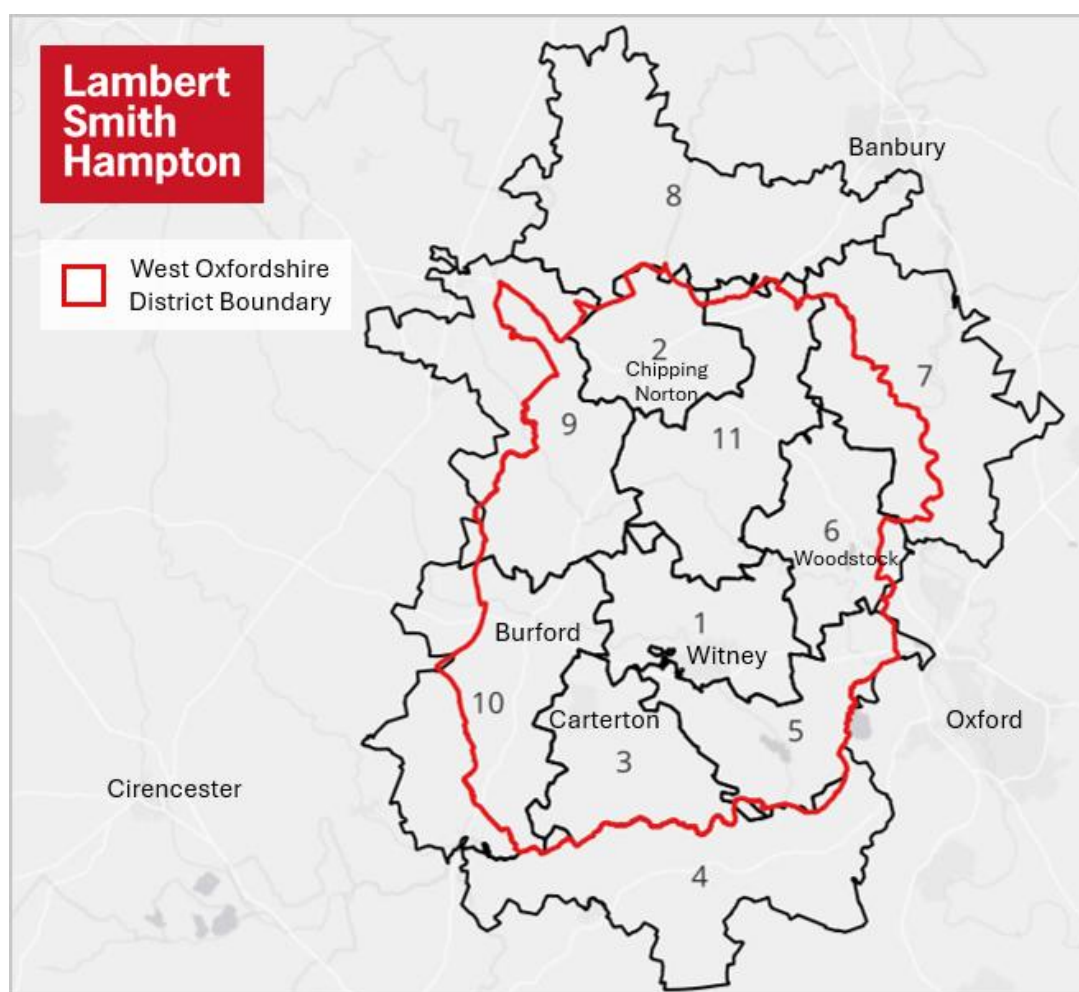
4. CATCHMENT, COMPETITION & MARKET SHARES

109. This section first describes the Catchment ('Study') Area that has been adopted as the framework for this study. It then sets out the headline results of the telephone interview survey, to identify where households normally shop for diverse types of convenience ('food') and comparison ('non-food') goods.

CATCHMENT (STUDY) AREA DEFINITION

110. The definition of an appropriate Catchment Area is an important starting point for retail and town centre assessments. It provides the framework for the household telephone interview survey and the retail capacity analysis.
111. The broad geography of the Catchment Area and composing zones has been informed by the Council's 2012 study. The Catchment Area is based on postcode geography as per the Council's study. It covers the entirety of the District area in full, as well as extending into neighbouring authorities. The figure below shows the full extent of the Catchment Area and Zones (also refer to **Volume 2; Appendix 1**).

Figure 16: Catchment Area for Study



112. By way of background, NEMS Market Research (NEMS) was commissioned to carry out the household survey. The survey was conducted between November and December 2024. The methodology and full 'weighted' survey results are set out in **Volume 4**. Responses were weighted by the population in each zone to ensure that the results in more sparsely or heavily populated zones were not under or over represented in terms of the market share assessment.

Table 3: Composition of the Study Area by Zones, Broad Geographic Area and Postal Sector

Zone	Geography	Postal Sectors	No. of Interviews	% of Total Interviews
1	Witney	OX28 1; OX28 2; OX28 3; OX28 4; OX28 5; OX28 6; OX29 0; OX29 6; OX29 9;	100	9.1%
2	Chipping Norton	OX7 5;	100	9.1%
3	Bampton - Carterton	OX18 1; OX18 2; OX18 3;	100	9.1%
4	Faringdon	OX13 5; SN7 8;	100	9.1%
5	Eynsham	OX29 4; OX29 5; OX29 7;	100	9.1%
6	Woodstock	OX20 1; OX29 8	100	9.1%
7	Whistlow	OX5 3; OX7 7; OX15 0; OX25 4; OX25 5; OX25 6;	100	9.1%
8	Cherington	CV36 5; OX15 4; OX15 5;	100	9.1%
9	Upper Milton	GL56 0; OX7 6;	100	9.1%
10	Burford	GL7 3; OX18 4;	100	9.1%
11	Walcot	OX7 3; OX7 4	100	9.1%
		Total	1,100	100%

113. The zone-by-zone approach detailed at **Volume 2, Appendix 2-5 for convenience goods** and **Appendix 6-9 for comparison goods** enables more detailed analysis of shopping patterns, market shares and expenditure flows both within and outside the Study Area (Zones 1-11).
114. The key findings are used to inform the baseline market share analysis and the centre/store turnover estimates that underpin both the quantitative and qualitative needs ('gap') assessment, carried out in compliance with good practice.

WEST OXFORDSHIRE DISTRICT COUNCIL: CENTRES AND COMPETITION PROFILE

115. The District is set in a predominantly rural area. It is characterized by its rolling countryside, historic towns, and villages. A significant part of the District falls within the Cotswolds National Landscape, renowned for its scenic landscapes and traditional limestone architecture. The A40 runs through the district, connecting it to Oxford and Cheltenham whilst the M40 motorway is accessible to the east for travel to London and the Midlands. Charlbury and Hanborough railway stations provide connections to Oxford and London Paddington.

116. In terms of geography it is surrounded as follows:
- To the North: the District is bordered by Warwickshire, with connections to the northern Cotswolds and market towns like Shipston-on-Stour.
 - To the East: Adjacent to Cherwell and the Vale of White Horse District(s), with easy access to the City of Oxford (approximately 12 miles from Witney, the District's principal town centre and administrative hub).
 - To the South: Bordering the county of Gloucestershire and South Oxfordshire, leading towards the Thames Valley.
 - To the West: Borders Gloucestershire, incorporating parts of the Cotswolds AONB.
117. **Section 6** (and **Volume 3**) provide more detailed health checks for:
- Principal Town Centre: **Witney**;
 - Primary Town Centres: **Carterton** and **Chipping Norton**; and
 - Town Centres with a significant tourist role: **Burford** and **Woodstock**.
118. The following provides an overview of the town and district centre(s) (also see **Section 6**):
- Witney** Town Centre is the principal town centre in the District with a strategic location in Oxfordshire and rich historical backdrop making it an attractive destination for both local shoppers and visitors alike. Witney is renowned for its wool and blanket production, which brought it international fame. The legacy of this industry is celebrated through landmarks like the Witney Blanket Hall. Its location near the Cotswolds makes Witney a popular stop for visitors exploring the countryside. Witney is well-connected via road, with regular bus services from Oxford and surrounding areas. At the heart of the town centre is the spacious Market Square, surrounded by historic buildings and serving as a venue for the regular outdoor markets. Witney has a mix of independent boutiques and several well-known retail chains, catering to diverse customer needs. The Woolgate Centre is a central retail space on Market Square that houses high-street brands such as Next, Waterstones, Holland & Barrett, Waitrose and specialty stores, and cafes, providing an all-weather shopping experience. This provision is further underpinned by additional provision on Marriotts Walk retail complex that offers a mix of fashion outlets including New Look, Hobbs, Trespass, Sports Direct and a Cineworld cinema. Witney's weekly markets and occasional farmers' markets in the Market Square are also a key diversifier, offering fresh produce and artisan goods. The centre also has a range of cafes and eateries, from tearooms to more formal dining spots. Examples of provision include Costa Coffee, independent bakeries, and traditional pubs like The Fleece. Free parking options, including spaces at Marriotts Walk and Woolgate Shopping Centre, encourage patronage to the centre.
- Witney town centre is also currently undergoing investment aimed at enhancing its infrastructure and public spaces. Oxfordshire County Council has initiated a project to improve Witney's High Street and Market Square. The

objectives are to enhance public spaces, support local businesses, and improve accessibility for pedestrians and cyclists. The project is funded by a £1.98 million grant from the government's Active Travel Fund. Following public consultations in September and October 2024, construction is scheduled to commence in early 2025, with completion expected by summer 2025.

- **Carterton** is a primary town centre is closely associated with RAF Brize Norton, the largest Royal Air Force base in the UK, located just outside the town. The town centre serves the military community, with businesses and services catering to personnel and their families. Carterton is also well connected by road, with bus services linking it to Witney and Oxford. Overall the centre is compact with the main commercial area centered around the broad intersection of Burford Road/Black Bourton Road and Alvescot Road/Brize Norton Road, with a mix of retail shops, cafes, and essential services. The centre has a mix of multiple and independent retailers including an Asda, Aldi and Morrisons supermarket(s). Regular market days bring fresh produce and artisan goods to the town. Recent investments aim to enhance the town centre, including upgrades to public spaces and improved accessibility including a new Sensory Garden has been established in Market Square and the completed St. John's Garden Project offering a community family garden designed to serve as a gathering place and recreational area for local families.
- **Chipping Norton** is also a primary town centre in the District. It is well connected to the surrounding areas via road, with the A44 providing access to Oxford, the Cotswolds, and beyond. Its location at the edge of the Cotswolds makes Chipping Norton a popular base for visitors exploring the region's hills and villages. Historically, Chipping Norton also thrived as a centre for the wool trade, evident in its iconic landmarks like the Bliss Mill, a striking former tweed mill that symbolizes the town's industrial past. In terms of its retail offer, the centre is renowned for its diverse array of independent retailers, including antique shops, bookshops, and boutique clothing stores. This provision is complemented by multiple representation in the form of supermarkets (Sainsbury's and Your Co-op Food market), WH Smith, and Boots. The leisure provision in the centre is dominated by the Chipping Norton Theatre - a cultural venue in the heart of the town, hosting plays, films, music, comedy, and community events. Its eclectic programming makes it a focal point for arts and entertainment in the region. The cultural scene is supplemented by the two screen boutique Living Room Cinema that opened in the centre in 2023.
- **Burford** is designated as a town centre with a significant tourist role. It is easily accessible via the A40, making it a convenient stop for exploring the Cotswolds and therefore often referred to as the "Gateway to the Cotswolds". The town centre is renowned for its historical significance, architecture and a variety of shops, cafes, and cultural attractions. Burford is home to a variety of boutique and independent stores offering antiques, arts and crafts,

homewares, clothing and jewellery. Burford's town centre tells the story of its medieval wool trade prosperity and the centre is lined with medieval, Tudor, and Georgian buildings. Many of these buildings house shops, inns, and galleries, retaining their historical character. Boutique hotels, inns, and bed-and-breakfast establishments offer a variety of options for travellers.

- **Woodstock** is also designated as a town centre with a significant tourist role. It is a historic market town known for its close connection to Blenheim Palace (a UNESCO World Heritage Site and the birthplace of Sir Winston Churchill). The town centre serves as a gateway to this grand estate, attracting visitors from around the globe. The palace and its expansive grounds draw tourists year-round, contributing significantly to the town's economy and vibrancy. Woodstock is easily accessible via major roadways and public transport, making it a convenient destination for day-trippers and longer stays alike. The Oxfordshire Museum is located in the town centre, celebrating the history and culture of Oxfordshire. Woodstock is also renowned for its independent shops, selling antiques, art, and handcrafted goods. The town centre is famous for its historic inns, such as The Bear Hotel and The Kings Arms.

119. The following provides a brief profile of the main competing centres and shopping/leisure locations outside of the District area:

- **City of Oxford** is renowned worldwide for its prestigious university, iconic architecture, and dynamic cultural scene. The city centre offers a mix of shopping destinations, dining establishments, cultural experiences, and recreational options that attract students, residents, and visitors alike. Cornmarket Street and High Street are the main shopping streets that feature a mix of well-known high-street brands, department stores, and independent boutiques. Queen Street hosts popular multiples and smaller retailers. The City Centre's side streets, such as Turl Street and the area around Broad Street, provide a range of independent stores, including bookstores, antique shops, and bespoke fashion outlets. In terms of shopping of shopping centres, Westgate Oxford is the premier shopping and leisure destination with over 100 stores, including flagship outlets for brands such as John Lewis, H&M, and Apple. It also features rooftop restaurants and bars with views of the city skyline. The smaller Clarendon Centre mall offers a range of high-street stores and specialty shops. In addition to its retail offer, the city centre has a diverse range of education, leisure and cultural provision. It is dominated by the colleges, libraries, and chapels of the world-famous University of Oxford. Radcliffe Camera, the Bodleian Library and the Sheldonian Theatre. There is also the Ashmolean Museum - The world's first university museum, showcasing art and archaeology; Museum of the History of Science; New Theatre Oxford (that hosts large-scale productions) and the Oxford Playhouse.

Oxford City Centre provides retail and leisure provision that blends with its historic character and offers a comprehensive and diverse array of activities to cater for a diverse local and visiting population.

Banbury in North Oxfordshire is a historic market town. The heart of the town centre, the Market Place features traditional cobbled streets and is home to the town's iconic cross, Banbury Cross, a symbol of its historic significance. Banbury High Street is a pedestrian-friendly area with a variety of national multiples and independent retailers. Banbury Market is held weekly in the town centre and offers fresh produce, clothing, and other goods in a traditional market setting. The central retail destination in Banbury, featuring over 70 stores is the Castle Quay Shopping Centre hosting multiples including Boots, H&M, JD Sports, and Primark, alongside smaller specialty stores. It has recently expanded to include Castle Quay Waterfront, a leisure-focused development that includes The Light Cinema.

- **Designer Outlets:** In addition to the above centres, the District is also in close proximity to the following designer outlets:
 - **Bicester Village:** one of the UK's most renowned luxury shopping destinations, located approximately 12 miles from Oxford and just an hour from London. The Bicester Village Station provides direct train services from London Marylebone in approximately 45 minutes. The village is designed with a pedestrianised street with landscaped paths, boutique storefronts focussing on the shopping experience. It offers over 160 boutiques from leading international and British brands, including Gucci, Prada, Chanel Beauty, Dior, and Jimmy Choo. The village offers a diverse range of dining options, including Café Wolseley, and Farmshop Restaurant & Café by Soho House.
 - **Swindon Designer Outlet Village** is housed in a repurposed Grade II-listed railway works building. It combines industrial heritage with a modern retail experience, offering visitors a unique shopping and leisure destination. It is easily accessible from the M4 motorway (Junction 16) and is well-connected by both bus and train, with Swindon Station nearby. The outlet features over 100 designer and high-street brands including Hugo Boss, Levi's, Ted Baker, Superdry, and Michael Kors. The outlet caters to a broad audience, from fashion and sportswear enthusiasts to home goods and luxury shoppers. A wide selection of dining options is also available, including Gourmet Burger Kitchen, Pizza Express, and Wagamama. The centre is adjacent to the STEAM Museum of the Great Western Railway, enhancing its appeal for visitors interested in British railway history.

MARKET SHARE ANALYSIS

120. The survey-derived market share analysis is detailed in **Volume 2** (see **Appendix 3** for convenience goods and **Appendix 7** for comparison goods. To note that the market share analysis at this stage of the assessment includes expenditure on 'Special Forms of Trading' (SFT), which comprises sales via the internet, mail order, stalls and markets, door to door and telephone sales.

Convenience Goods Market Shares

121. Convenience goods retailing is generally defined as comprising everyday essential items (including food, drinks, newspapers/magazines and confectionery), as well as an element of non-durable housing goods (such as washing up liquid, kitchen roll, bin bags, etc.).
122. The overall market share analysis (%) for all centres and stores are detailed in Table 1 (**Appendix 3**). These market shares have been derived from the assessment of the ('primary') responses as to where people normally shop for their more infrequent main ('bulk') food purchases, and for their more frequent day-to-day ('top up') convenience and grocery purchases.
123. Furthermore, in order to prevent food shopping patterns being 'skewed' by larger superstores and food stores in the Catchment Area, the survey also asked respondents where else they normally shop (if anywhere) for their 'main' and 'top up' purchases in addition to the first store identified (i.e., the 'secondary' responses). The market shares for these 'secondary' shopping purchases are set out in Table 3 ('other' main food shopping) and Table 5 ('other' top up food purchases') in **Appendix 3**.
124. The 'primary' and 'secondary' responses for the different types of food shopping have then been merged through the application of a weighting based on judgements as to the proportion of household expenditure normally accounted for by each type of convenience goods shopping. In this case we have applied a reasonable and robust weighting of 60% for main 'bulk' shopping; 15% for secondary main 'bulk' shopping; 15% for primary 'top-up' shopping; and 10% for secondary 'top-up' shopping.
125. The summary of market shares from across the Study Area (Zones 1-11) for town and out-of-centre locations for convenience goods locations in the District area is summarised in Table 4. We have provided key headlines based on the Study Area (Zones 1-11):

Table 4: Convenience Goods: Study Area - Town and Out-of-Centre Market Shares: Retention (%)

TABLE 1: ALL CONVENIENCE GOODS - 2024 MARKET SHARE ANALYSIS (%) <i>Including Internet Shopping and other Special Forms of Trading</i>	
WEST OXFORDSHIRE DISTRICT AREA	Study Area
TOWN CENTRE: WITNEY	
Co-op, High Street	0.4%
M&S, Marriotts Walk	1.0%
Waitrose, Witan Way, Woolgate	6.1%
All Other Floorspace	0.3%
Subtotal	7.7%
TOWN CENTRE: CHIPPING NORTON	
Co-op, High Street	2.6%
Sainsbury's Superstore, Market Street	1.5%
All Other Floorspace	0.1%
Subtotal	4.2%
TOWN CENTRE: CARTERTON	
Asda Supermarket, Black Bourton Road	5.8%
Morrisons, Black Bourton Road	4.0%
Aldi, Alvescot Road	3.1%
All Other Floorspace	0.0%
Subtotal	12.9%
TOWN CENTRE: BURFORD	
Co-op, High Street	0.3%
All Other Floorspace	0.0%
Subtotal	0.4%
TOWN CENTRE: WOODSTOCK	
Co-op, High Street	0.3%
All Other Floorspace	0.2%
Subtotal	0.5%
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	8.1%
OUT-OF-TOWN CENTRE STORES / LOCATIONS	
Lidl, New Close Lane, Witney	2.8%
Sainsbury's Superstore, Witan Way, Witney	7.8%
Aldi, Banbury Road, Chipping Norton	4.1%
M&S Foodhall, Windmill Square, Chipping Norton	1.4%
Subtotal	16.1%
WEST OXFORDSHIRE DISTRICT AREA	49.9%

126. The main headlines from the table are summarised below:

- All the convenience goods floorspace within the District area attains a market share of 49.9% from across the Study Area (Zones 1-11). In our view this is an average level of retention.
- Of the 49.9% market share retention, more than half of this (33.8%) goes to town centre floorspace. The following named stores attained the highest

market shares in town centre locations with stores in Carterton dominating, namely: Waitrose, Witan Way (Witney) (6.1%); Asda Supermarket, Black Bourton Road (Carterton) (5.8%); Morrisons, Black Bourton Road (Carterton) (4%); and Aldi, Alvescot Road (Carterton) (3.1%).

- All out-of-town centre convenience goods floorspace attains a retention of 16.1%. Of this provision Sainsbury's Superstore, Witan Way, Witney attains the highest market share of 7.8%, followed by Aldi, Banbury Road, Chipping Norton (4.1%) and thereafter Lidl, New Close Lane, Witney (2.8%).

127. The table below shows the market shares of centres and stores located outside the District area. This broadly represents a proxy for the 'leakage' of shoppers and spend. However, we advise that care should be applied in interpreting these market shares and 'leakage' in particular. This is because they are dependent on how widely drawn the catchment area is and also reflects the fact that some of the stores located in neighbouring authorities will be more convenient and easily accessible to residents rather than necessarily reflecting any under-provision or latent need for new convenience floorspace.

Table 5: Convenience Goods: Market Share: Leakage (%)

OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT	
Abingdon	2.4%
Banbury	9.0%
Bicester	2.5%
Faringdon	3.9%
Kidlington	2.9%
Moreton-in-Marsh	2.7%
Oxford	1.8%
Stratford-upon-Avon	0.7%
Swindon	0.6%
Wantage	0.8%
Warwick	0.2%
All Other Centres / Stores	5.2%
Subtotal	32.7%
SPECIAL FORMS OF TRADING/ INTERNET SHOPPING	17.3%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT	50.1%

128. The table shows:

- Collectively, almost half (50.1%) of the spending from the Study Area (Zones 1-11) is going to centres/stores outside the District area. This is reasonable in our view given the increased competition from other neighbouring centres and food stores in the context of the wide area of coverage. The principal competing location is Banbury (9%) followed to a), Bicester (2.5%) and Abingdon (2.4%). .

- **Special Forms of Trading (SFT)** is achieving a market share of 17.3% in the widely defined Study Area (Zones 1-11). This figure is below the Experian national average forecast of 18.6% in 2025.

Comparison Goods - Market Share Analysis

129. Comparison goods are generally classified as items purchased less frequently and include clothing, footwear, household and recreational goods. For the following main categories of non-food expenditure, each respondent was asked where they did most of their household's shopping, and "where else" they shopped.

Table 6: Main Categories of Comparison Goods Expenditure

Household Survey Question:	Where do households normally shop for:	See Appendix 7
Q8 & Q10	Clothing and footwear (fashion) items	Table 2
Q11	Recording media (e.g., records, CDs, DVDs, etc.)	Table 3
Q12	Audio-visual, photographic and computer items & domestic electrical	Table 4
Q13	Books, Stationery and Drawing Materials	Table 5
Q14	Pet-related products, hobby items, sportswear, camping, cycling and musical instruments	Table 6
Q15	Furniture, carpets, other floor coverings and household textiles	Table 7
Q16	DIY goods, decorating supplies & garden products	Table 8
Q17	Personal care products & medical goods	Table 9
Q18	All other goods – including jewellery, watches, glassware, tableware etc.	Table 10

130. Table 1 (**Appendix 7**) sets out the total combined market shares for all comparison goods expenditure allocated to the main centres and stores. The market share analysis (%) takes account of the distribution and weight of spend (£) by households on the different comparison goods categories. This ensures that that the resultant shares are not 'skewed' by any particular comparison goods expenditure category. This is a standard approach for retail assessments. As for the analysis of convenience goods, the market shares at this stage of the analysis include expenditure on SFT.
131. The summary of market shares for town and out-of-centre locations for comparison goods locations in the District area is shown in Table 7.

Table 7: Comparison Goods: Town and Out-of-Centre Market Shares

WEST OXFORDSHIRE DISTRICT AREA	
	Study Area
TOWN CENTRE: WITNEY	11.3%
TOWN CENTRE: CHIPPING NORTON	2.7%
TOWN CENTRE: CARTERTON	1.6%
TOWN CENTRE: BURFORD	0.3%
TOWN CENTRE: WOODSTOCK	0.2%
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	1.2%
OUT-OF-TOWN CENTRE STORES / LOCATIONS	
London Road RP	0.1%
(M&S Foodhall, Mountain Warehouse, Pets Corner), Chipping Norton	
B&Q, Thorney Leys Park, witney	1.8%
Lidl, New Close Lane, Witney	0.2%
Sainsbury's Superstore, Witan Way, Witney	1.4%
Aldi, Banbury Road, Chipping Norton	0.2%
All Other Out-of-Centre floorspace	1.1%
Subtotal	4.7%
WEST OXFORDSHIRE DISTRICT AREA	
	22.0%

132. The market shares are set out in the table and the main headlines are described below:
- Comparison goods floorspace within the District attains a market share of 22% from across the Study Area (Zones 1-11) which is a low level of retention.
 - Of the overall 22% market share retention, Witney town centre attains half of this market share attaining 11.3% followed by Chipping Norton at 2.7% and Carterton at 1.6%.
 - In contrast, the out-of-centre floorspace collectively attains a 4.7% level of retention. The highest within this category is B&Q , Thorney Leys Park at 1.8% followed by the Sainsbury's Superstore, Witan Way, Witney at 1.4%.
133. The table below shows 'leakage' of comparison goods expenditure to other competing centres and stores located outside of the District area. The key headlines are:

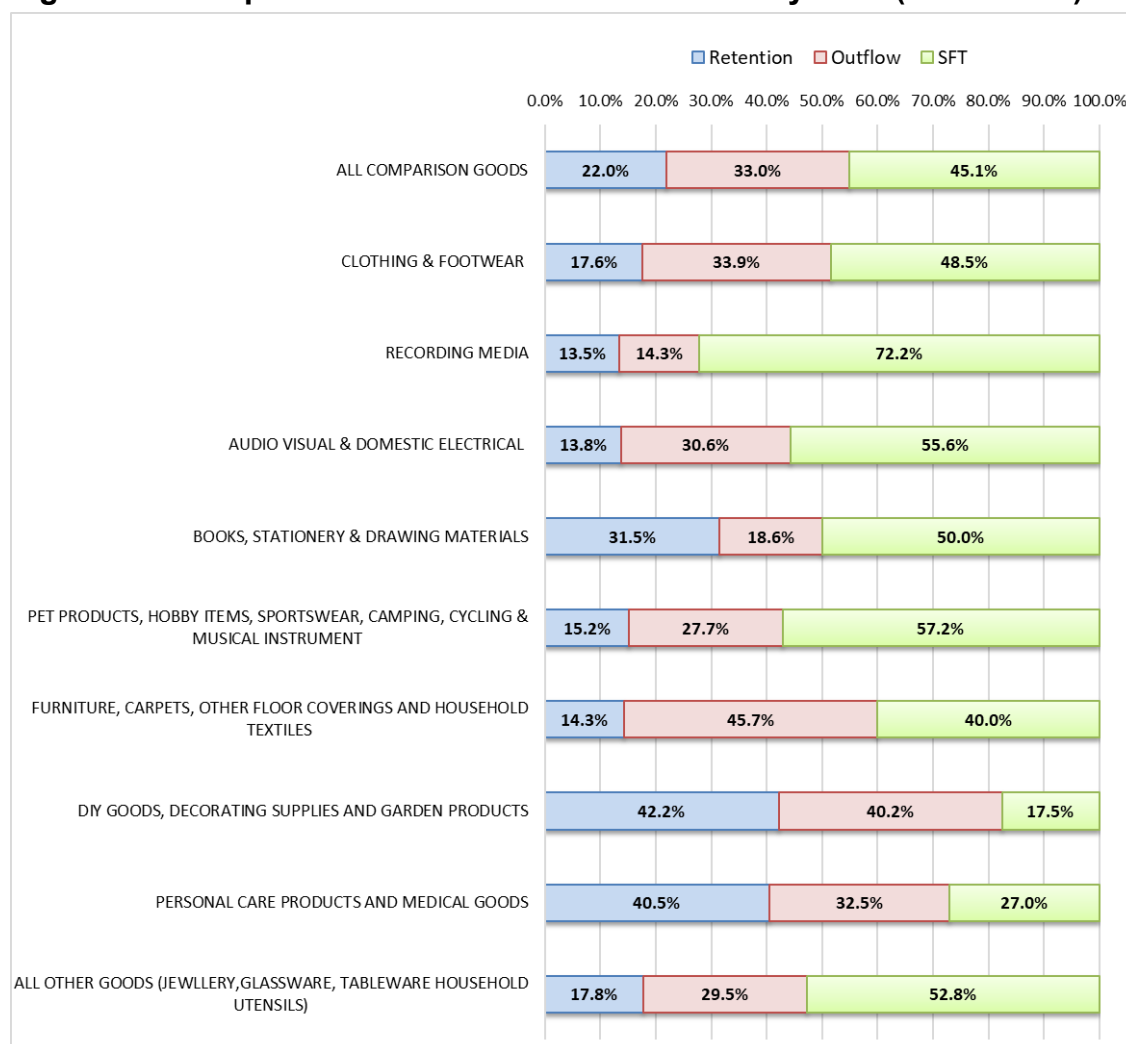
Table 8: Comparison Goods: Market Share Leakage (%)

OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT	
Abingdon	1.8%
Banbury	7.9%
Bicester	1.7%
Bicester Village	0.2%
Central London	0.4%
Cheltenham	0.7%
Faringdon	0.5%
Gloucester	0.0%
Kidlington	0.9%
Leamington Spa	0.1%
Milton Keynes	0.8%
Moreton-in-Marsh	0.6%
Oxford	9.8%
Stratford-upon-Avon	1.2%
Swindon	1.6%
Swindon Designer Outlet Village	0.5%
Wantage	0.5%
Warwick	0.0%
All Other Centres / Stores	3.7%
Subtotal	33.0%
SPECIAL FORMS OF TRADING/ INTERNET SHOPPING	45.1%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT	78.0%
OVERALL TOTAL	100.0%

- There is a substantial 78% 'leakage' of comparison goods expenditure to other competing centres; The key competing locations are the competing centres of Oxford City Centre (9.8%) and Banbury (7.9%).
- **Special Forms of Trading (SFT)** forms a substantial contribution to the leakage achieving a very high market share of 45.1% from across the Study Area (Zones 1-11). These market shares are higher than the national average figure forecast of 34% for 2025 by Experian.

134. The figure below shows the market share ('retention') of different categories of comparison goods achieved by centres/stores in the District from within the Study Area (Zones 1-11).

Figure 17: Comparison Goods Market Shares: Study Area (Zones 1-11)



135. The above figure shows that across the Study area (Zones 1-11), online shopping accounts for 45.1% of market share and its proportion is high (40% and above) amongst most comparison goods sub-categories except for DIY goods (17.5%) and personal care products (27%). The highest market share for online shopping is in the category of recording media achieving a market share of 72.2%.
136. In terms of the overall level of retention of 22%, the highest (above 40%) is amongst the categories of personal care products and medical goods (40.5%).
137. Outflow accounts for 33% of market share for all comparison goods. The highest (above 40% market share is in the categories of: furniture & floor coverings (45.7%) and DIY goods (40.2%)
138. The above indicates that in the categories of DIY goods and personal and medical goods there is a tendency to shop either locally or outside the District but not online. For most of the other sub-categories of comparison goods, the survey has shown the dominance of online shopping.

SUMMARY

139. In summary the market share headlines for convenience goods retailing are:
- SFT has a 17.3% market share in the Study Area (Zones 1-11), which is below the national average forecast by Experian Business Strategies of 18.6% in 2025.
 - The 'retention level' of 49.9% by floorspace in the District area represents an average level of retention.
 - Of the 49.9% market share retention more than half (33.8%) goes to town centre floorspace with the provision in Carterton dominating and attaining 12.9% of this total .
 - The out-of-centre category contributes to 16.9% of the retention level of 49.9%. This market share is dominated by the Sainsbury's Superstore, Witan Way, Witney which attains the highest market share in this location category of 7.8%.
140. For comparison goods the key headlines are:
- SFT's market share in the Study Area of 45.1% is considerably higher than Experian national average of 34% for 2025.
 - Centres and stores in the District are achieving a low overall retention level of 22%. Of this total, Witney town centre attains the highest market share at 11.3.
 - The out-of-centre category collectively attains a 4.7% level of retention dominated by the B&Q , Thorney Leys Park at 1.8% followed by the Sainsbury's Superstore, Witan Way, Witney at 1.4%.

5. CENTRE HEALTH CHECKS: APPROACH & KPIs

141. **Section 6** sets out the key findings of the health check assessment of the District's centres. These have been informed, **where possible and available**, by the following Key Performance Indicators (KPIs) outlined in the National Planning Practice Guidance (PPG) (Paragraph 006. Reference ID: 2b-006-20190722). The KPI's that area stated and that **may** be relevant in assessing the health of town centres include:
- the diversity of uses;
 - proportion of vacant street level property;
 - commercial yields on non-domestic property;
 - customers' experience and behaviour;
 - retailer representation and intentions to change representation;
 - commercial rents;
 - pedestrian flows;
 - accessibility;
 - perception of safety and occurrence of crime;
 - state of town centre environmental quality;
 - balance between independents and multiples;
 - any evidence of barriers to new businesses opening and existing business expanding;
 - opening hours/availability/extent to which there is an evening and night time economy offer (The "evening" economy generally relates to all leisure activities that are open until around 11pm. The "night-time" economy is generally defined as businesses and activities with late night licences that are open beyond 11pm, particularly at the weekend.).
142. These KPIs help to identify the critical Strengths and Weaknesses of each centre from a retail and leisure perspective; the Opportunities for new sustainable development and growth; and any current and potential future Threats to their overall vitality and viability ('SWOT' assessment).
143. The health check and SWOT assessments draw on a number of industry standard published datasets (e.g., Experian Goad, PROMIS, etc.), primary market research (including the findings of the household telephone interview survey), and LSH's own commercial market intelligence and research. This will help understand the current vitality and viability of the District's centres, how their health has changed over time, and their prospects over the short, medium and longer term. Our approach and some of the key performance indicators assessed are briefly described below.

DIVERSITY OF USES:

144. The health check assessments have been principally informed by the latest available Experian Goad Category reports, site visits and the Council's monitoring data **where available**. These assessments set out the number and proportion of

units and floorspace by different uses (i.e., convenience, comparison, leisure and service uses). Experian Goad define 'services' into three sub-categories:

- retail services - including hairdressers, beauty salons, travel agents, launderettes, opticians, etc.; (Note: Since the reform of the Use Classes Order (1 September 2020) all retail services are defined as Class E (previously Class A1). This is apart from shops not more than 280sqm "*most selling essential goods ... and at least 1km from another similar shop*", which are now covered by the new Class F2 (local community uses).
- leisure services - including cafés and restaurants, betting shops and fast food/ takeaway outlets (Note: Cafés and restaurants are now classified as Class E (previously Class A3); betting shops are 'sui generis'; and fast food/ takeaway outlets are 'sui generis' (previously Class A5); and
- financial and professional services - including banks, estate agents, etc. (Note: Financial and professional services are now classified as Class E (previously Class A2)).

VACANCY LEVELS

145. The number and scale of vacancies in a centre, and the length of time properties have been vacant, represents one of the critical KPIs used to assess a centre's overall vitality and viability. For example, high vacancy levels, or a concentration of vacancies in certain areas/streets, could indicate underlying weaknesses in terms of occupier demand, and/or the fact that vacant units are not 'fit-for-purpose' to meet the needs of modern businesses (for example, there may be too small and/or have a poor layout/configuration). Notwithstanding this, vacancies can arise in even the strongest centres due to the natural 'churn' in businesses opening and closing at any point in time. This KPI must therefore be used and interpreted with caution. Where possible we have assessed the changes in vacancy levels (outlets and floorspace) over time for the four main centres based on the findings of previous evidence-based studies.

MULTIPLE AND INDEPENDENT OUTLETS

146. A multiple is defined by Experian as being part of a network of nine or more outlets. It is widely accepted that a good presence and mix of multiples in a centre, alongside a strong and diverse independent offer, helps to increase the overall attraction, diversity and performance of centres. For many centres multiples are the key anchors to their shopping and leisure offer, helping to draw visitors from wider catchments and generate more frequent shopping trips and footfall, to the benefit of other shops, businesses and facilities in terms of linked trips and expenditure, and longer dwell times.

STREET & COVERED MARKETS

147. The presence of high quality, well managed and diverse street/indoor markets and food halls in centres can have a significant positive impact on their overall vitality

and viability. This is recognised by the NPPF (paragraph 90c), which states that existing markets should be retained and enhanced and, where appropriate, new ones should be created, ensuring that markets remain attractive and competitive. It is widely accepted that successful markets in the right locations can help increase trips to centres from a wider catchment, attract a more diverse customer profile, generate benefits for the wider daytime and evening economy, and act as "seedbeds" and "incubator space" for the growth of new businesses.

MARKET DEMAND & REQUIREMENTS

148. Evidence of market demand from retail and leisure operators for representation in a town centre can provide a further indication of the overall health and attraction of centre, and investor confidence. In this case evidence was drawn from standard published sources (including the Requirements List) and, where possible, supplemented by LSH's own commercial market intelligence. However, it should be noted that the published information is not definitive, as many retailers and leisure operators prefer not to make their requirements public, as it can potentially undermine their current and future negotiating position with potential landlords. Furthermore, market demand is often opportunity-driven and often responds to the availability and marketing of new development sites and regeneration opportunities.

PRIME ZONE A RENTS & COMMERCIAL YIELDS

149. The level of rent, that businesses are prepared to pay for retail space, and the commercial yields achieved, provide a further indication of the relative strength of the centre and its prime retail pitch. However, it should be noted that Prime Zone A rents and yields are not available for all centres, particularly smaller centres where there is more limited evidence on transactions. Therefore, an assessment of Prime Zone A rents and yields is only provided where there has been significant market activity. Evidence of average commercial yield levels for centres is inherently more difficult to source, as it depends on the level and volume of transactions in any one year. In general terms though, where reported yields are low, this usually represents a particularly strong performing investment. Conversely, where the yield value is high, this generally reflects poorer performing investments.

CUSTOMER VIEWS AND BEHAVIOUR

150. Our assessment of customers' views and behaviours and shopping patterns draws on the outputs of the commissioned 1,100 household survey (undertaken between November and December 2024), as evidence to help inform the town centre health checks.

TOWN CENTRE ENVIRONMENTAL QUALITY

151. Assessment of a centre's overall environmental quality represents a further KPI to help assess overall attraction, vitality and viability. An assessment of environmental quality (including, for example, cleanliness and attractiveness, security, treatment of buildings and open/green spaces) was carried out as part of our site visits and further informed by the findings of the household survey and stakeholder engagement, along with other available reports and evidence.

ACCESSIBILITY

152. The accessibility of a centre is measured by the ease and convenience of access by different modes of travel to and across the centre; including dedicated access for pedestrians, cyclists and disabled people. This assessment was informed by the survey evidence, along with information provided by the local planning authority, and observations undertaken as part of the centre audits and site visits.

PERCEPTION OF SAFETY AND OCCURRENCE OF CRIME

153. The statistics detailing crime rates for specific regions, urban areas and postcodes is based on data sourced from UKcrimestats.com. This source aggregates open police force data on crime trends for England, Wales, and Northern Ireland. It provides, in our view, the most complete catalogue of crime and safety information available. This is supplemented by the feedback from the household survey, stakeholder engagement and other research to help inform current perceptions of safety and crime for the main town centres.

OUT OF CENTRE PROVISION

154. The existing and planned out of centre retail and leisure floorspace in the Council area and neighbouring local authority areas was determined using a number of published sources, evidence provided by the local authority (where available), and the findings of the market research surveys and town centre audits.

NEW INVESTMENT & POTENTIAL DEVELOPMENT

155. The Council provided evidence of all existing, committed and planned retail/leisure investment and development in the main centres. All new retail and leisure floorspace identified by this study covers commitments and permissions (normally over 500 sqm gross).

SUMMARY

156. Health checks are important planning 'tools' for appraising and monitoring changes in the overall attraction and performance of town centres and informing the preparation of robust strategies and plans. The assessments of Key Performance Indicators (KPIs) carried out for this study are informed by the PPG and are based on different data sources and market intelligence, including published research, site visits and the household telephone interview surveys. Taken together these KPIs enable a robust assessment of each centre's SWOTs (Strengths, Weaknesses, Opportunities and Threats), and will help to identify any significant "gaps" in provision.

6. HEALTHCHECK SUMMARIES

157. This section sets out the summary findings of the town centre health checks for:
- Principal Town Centre: **Witney**;
 - Primary Town Centres: **Carterton** and **Chipping Norton**; and
 - Town Centres with a significant tourist role: **Burford** and **Woodstock**.
158. The detailed health checks and audits are detailed in **Volume 3**.

TOWN CENTRE HEALTH CHECKS - SUMMARY

159. As described in the previous section, and in **Volume 3**, the health checks are based on Key Performance Indicators (KPIs) set out in the PPG. The assessments are informed by different data sources and market intelligence, including published research, site visits and the Council's monitoring data. Taken together these KPIs enable a robust assessment of each centre's SWOTs (Strengths, Weaknesses, Opportunities and Threats), and help to identify any significant "gaps" in provision.
160. By way of overview the table below shows the scale of the retail, leisure and service provision in the centres.

Table 9: Centre Analysis: Number of Outlets

Number of Outlets	Witney	Carterton	Chipping Norton	Burford	Woodstock
Comparison Retail	91	9	34	39	28
Convenience Retail	19	8	9	7	5
Retail Services	46	14	11	3	9
Leisure Services	53	25	27	12	23
Financial & Business Services	25	6	8	2	4
Vacant	28	1	19	9	4
Total	262	63	108	72	73

Source: Experian GOAD

161. The outlet count clearly shows Witney Town Centre as the largest and dominant centre in the District followed by Chipping Norton.

Table 10: Centre Analysis: Floorspace (gross sqm)

Floorspace	Witney	Carterton	Chipping Norton	Burford	Woodstock
Comparison Retail	17,600	2,670	4,530	4,690	2,460
Convenience Retail	5,970	7,620	2,310	920	560
Retail Services	3,540	1,510	980	120	630
Leisure Services	12,560	4,160	4,960	2,300	4,660
Financial & Business Services	4,460	380	770	260	290
Vacant	4,150	80	2,820	1,020	430
Total	48,280	16,420	16,370	9,310	9,030

Source: Experian GOAD

162. In terms of floorspace, the data reinforces that Witney is by far the largest and dominant centre in the District. The next 'band' is between the 16,350sqm to 16,450sqm band with Carterton (16,420 sqm) being some 50sqm larger than Chipping Norton (16,370sqm). The floorspace in Carterton is led by the large provision of the convenience goods floorspace that includes the Asda, Aldi and Morrisons supermarket(s). The last band is between the 9,000sqm to 9,350sqm band that includes Burford (9,310 sqm) and lastly Woodstock (9,030sqm).
163. The District's main centres are distinct from each other in terms of their physical characteristics, catchments, and market position, which is described in detail in the health check assessments in **Volume 3**. The following tables and commentary summarise the main SWOTs (Strengths, Weaknesses, Opportunities and Threats) for each centre. The findings help to identify their relative performance in the District's network and hierarchy of centres, and any significant "gaps" in provision.

WITNEY: SWOT

164. As detailed above, Witney town centre is the dominant centre for larger scale commercial, community and leisure provision in the District. Whilst accessible by road with several bus routes connecting Witney to smaller centres across the District, as well as to and from Oxford, the nearest train station is Hanborough, approximately 8.5km north east of the centre (a 15-minute drive).
165. The environmental quality of the town is good with a setting that blends old and new buildings with historic character and charm. The centre has good signage and ample street furniture.
166. Of the 262 units across the centre the majority, 91 units (34.7%) of these are comparison retail outlets with leisure units (53 units, 20.2%) being the next dominant category. Witney has a good range of both national multiples (e.g. Fatface, Boots, Superdrug, Waitrose, Pizza Express) and independents including Lilly's Attic (fashion accessories, gifts and home), The Flower Shop, Beanbag Natural Health (health food store), 1863 Café & Bar and Coffeesmith Café.
167. In terms of vacant space, the centre has a 10.7% vacancy rate in terms of outlets (lower than the UK average of 14.1%). Additionally, 8.6% of the floorspace in Witney is vacant (which also compares favourably to the UK average of 14.2%).
168. Stakeholder engagement has raised the following concerns:
- Underutilised Spaces: Market Square lacks activation on non-market days, limiting its potential.
 - Retail Challenges: Online shopping growth, vacant units, and competition from Oxford, Bicester Village, and out-of-town retail parks.
 - Traffic & Accessibility: Peak-time congestion & parking, and traffic management issues, including frustration over the High Street closure.
 - Public Space & Infrastructure: Some areas need investment, and there is a lack of covered spaces and a visitor centre.
 - Public Transport: Poor connections, especially in the evenings and no rail link.

- Competition from Nearby Centres: Concerns that Carterton and future developments like Salt Cross could potentially divert retail and social activity away from Witney.

169. Witney town centre is also currently undergoing investment aimed at enhancing its infrastructure and public spaces. Oxfordshire County Council has initiated a project to improve Witney's High Street and Market Square. The objectives are to enhance public spaces, support local businesses, and improve accessibility for pedestrians and cyclists. The project is funded by a £1.98 million grant from the government's Active Travel Fund. Following public consultations in September and October 2024, construction is scheduled to commence in early 2025, with completion expected by summer 2025.
170. Overall, the Strengths, Weaknesses, Opportunities, Threats (SWOT) can be summarised as follows:

Strengths

- Strong comparison retail offer.
- Strong presence of high street banks.
- Good convenience anchors.
- Good range of quality independents.
- Good presence of a range of national multiples.
- Cinema as a key entertainment attraction.
- Witney market as key attractor and footfall driver.
- Good accessibility.
- Strong heritage and historic character.
- Good blend between old and new architecture.
- EV charging provision.
- Access to green space.
- Parking provision.
- Evidence of market activity and demand.
- Nearby community services – library and health centre.
- Retail rents consistently above comparable towns.

Weaknesses

- Rising vacancy rate.
- Limited restaurant offer relative to the centre's size.
- 2024 footfall down -28% vs 2023 (January to August).
- Rising levels of crime.
- Underutilisation of Market Square on non-market days.
- Limited evening economy.
- Street clutter detracting from environmental quality in parts.
- No town centre manager.
- Lack of advertising for the market.

Opportunities

- Capitalise on interest for representation from retailers.
- Creative use of vacant units through pop-ups, community hubs, co-working spaces etc.
- Broader mix of uses within the centre to address vacant units – e.g., residential.
- Better use of Market Square on non-market days.
- Improvements to evening economy – both in terms of provision and coordination of the offer.
- More place promotion.
- Better cycle provision (cycle lanes).
- Improve public realm including better signage.
- Heritage guide and better coordination between centres.

Threats

- Potential continued decline in comparison retail offer.
- Rising vacancy rates weakening the town's draw.
- Rising crime rate discouraging visitors who may feel unsafe.
- Competing centres such as Oxford and Bicester Village.
- The growth in online shopping and its impact on brick-and-mortar retail outlets.
- High business operating costs.
- Further closures of high street retailers (e.g., WHSmith).

CARTERTON: SWOT

171. The centre is closely associated with RAF Brize Norton. It serves the military community, with businesses and services catering to personnel and their families. Carterton is also well connected by road, with bus services linking it to Witney and Oxford.
172. The centre has a mix of multiple and independent retailers with a strong presence of convenience retailing that includes an Asda, Aldi and Morrisons supermarket(s). Carterton has a total of 63 units and an overall quantum of 16,420 sqm in floorspace. The centre has an extremely low vacancy rate of 1.6% which is considerably lower than the national rate of 14.1%.
173. The environmental quality of the centre is good with well-kept buildings and frontages together with ample provision of street furniture. The centre would benefit from further greening.

174. Carterton has a relatively limited evening offer, with related establishments are restricted to a small selection of pubs, restaurants and a cocktail bar.
175. Recent investments aim to enhance the town centre, including upgrades to public spaces and improved accessibility including a new Sensory Garden which has been established in Market Square and the completed St. John's Garden Project offering a community family garden designed to serve as a gathering place and recreational area for local families.
176. The future for the centre will be determined by the scale of new residential development in the surrounding areas as well as the growth and improvements in infrastructure and services this may potentially bring.
177. The centre's Strengths, Weaknesses, Opportunities, Threats (SWOT) can be summarised as follows:

Strengths

- Strong convenience retail offer (main reason for visiting for more than half of customers).
- Good leisure service offer.
- Low vacancy rate.
- Good presence of national multiples.
- Good parking provision.

Weaknesses

- High representation of fast-food and takeaways.
- Footfall down by -16% when comparing 2023 and 2024 (January to August) figures.
- Hard environment with limited greenery and vibrancy.
- Limited character and charm when compared to the other centres in the District.
- Low comparison retail provision.

Opportunities

- Improved market offer.
- More greenery and vibrancy across the centre.
- A greater diversification of uses within the centre, particularly with food & beverage operators which is dominated by fast-food and takeaways.

Threats

- High business operating costs.
- The growth in online shopping and its impact on brick-and-mortar retail outlets.
- Ongoing anti-social behaviour issue in the centre potentially deterring visitors due to safety concerns.
- Continued decline in footfall numbers.

CHIPPING NORTON: SWOT

178. Chipping Norton is the northern most town centre within the District. The A44 runs through the centre as well as High Street, West Street (to the south), Market Street, Middle Row and Cattle Market. The centre has a strong mix of retail and leisure which is supported by The Chipping Norton Theatre as a cultural and community hub as well as the two screen boutique Living Room Cinema.
179. Across the centre, comparison retail is the common use, taking up almost 1 in 3 outlets, whilst leisure services occupy more floorspace than any other use. There are a total of 19 vacant outlets in Chipping Norton which represents 17.6% of the overall outlets (higher than the UK average of 14.1%).
180. The quality of the environment is generally enhanced by the historic buildings architecture and well-kept shop fronts. The town centre is broadly centred on the central artery of the A44 which detracts from the environmental quality and permeability across the centre. Although the road is relatively busy, there is sufficient paving on both sides of the road, dropped and tactile paving, and metal bollards for pedestrian safety and to aid pedestrian road crossings. This is particularly necessary as there is a sloping gradient across the centre from east to west.
181. The Strengths, Weaknesses, Opportunities, Threats (SWOT) can be summarised as follows:

Strengths

- Strong history, character and charm.
- Entertainment venues as key attractions – Chipping Norton Theatre and The Living Room Cinema.
- Good mix of uses which are broadly in line with the UK averages.
- The offer is stable when comparing the mix of uses to the 2012 study – particularly with comparison retail, which typically has declined in recent years, but remains a strong use in Chipping Norton.
- Strong presence of independent retailers.
- Sainsbury's and Co-op as key convenience retail anchors for the centre.
- Chipping Norton Market as a driver of footfall for the centre.
- Good environmental quality overall.

Weaknesses

- Vacancy rate above UK average (outlets and floorspace) – significant increase from previous study.
- Footfall down -14% from 2023 to 2024 (January to August).
- Road network fragmenting the centre as well as posing challenges to pedestrians and cyclists.
- Gradient of the centre creates a disconnect and further accessibility challenges.

Opportunities

- Improvements to pedestrian accessibility – provision of a crossing to the north of the centre as well as upgrading the pedestrian island crossings.
- Improved promotion of the market.
- The creation of a public space that acts as the heart of the centre, with provision of seating and a pleasant place to spend time, socialise and dwell.
- Consideration of alternative uses to address vacant space (such as residential, healthcare and education).
- Creative use of the vacant space in the form of pop-ups, community hubs and co-working spaces.
- Heritage guide and better coordination between centres.

Threats

- High business operating costs.
- Out of centre offers that may be deemed more convenient and safer – Aldi and London Road Retail Park to the east.
- Continued rise in vacancies damaging the appeal and attraction of the centre.
- The growth in online shopping and its impact on brick-and-mortar retail outlets.
- Further closures of high street retailers (e.g., WH Smith).

BURFORD: SWOT

182. Burford is designated as a town centre with a significant tourist role. It is easily accessible via the A40, making it a convenient stop for exploring the Cotswolds and therefore often referred to as the "Gateway to the Cotswolds".
183. The centre is dominated by comparison retail with over half of the units and floorspace occupying this use (more than double the proportionate representation that would be expected when comparing to the UK average for outlets). Whilst food and beverage operators are underrepresented in terms of outlets when compared to the UK average; they occupy a higher proportion of floorspace than average. The centre has a lower vacancy rate in terms of outlets of 12.5% when compared to the national average of 14.1%. The broad provision in Burford is led by small-scale independent operators that add to the vitality and charm of the centre.
184. The environmental quality of Burford is good, with great history, charm and character. As with Chipping Norton, the centre is dissected by the A361 (High Street / The Hill) and the constant flow of traffic does detract from this. However there is also sufficient paving on both sides of the road for pedestrians.
185. Overall, the Strengths, Weaknesses, Opportunities, Threats (SWOT) can be summarised as follows:

Strengths

- Strong comparison retail offer that has retained its significant presence since the previous study.
- Strong mix of independent operators.
- Footfall up +31% from 2023 to 2024 (January to August).
- Strong character and charm.
- Attractive, historic buildings with well-kept shop frontages.
- Examples of signage and wayfinding.

Weaknesses

- Limited provision of retail services and financial & business services.
- Rise in vacant outlets from none in the previous study, to nine.
- Road network and traffic as an obstacle and barrier to cyclist and pedestrian accessibility.
- Limited public transport connections.
- Not enough parking available.

Opportunities

- Improved accessibility for cyclists and pedestrians – more bike racks and pedestrian crossings.
- Improved public transport connectivity, which could ease the pressures on parking provision.
- Heritage guide and better coordination between centres.

Threats

- High business operating costs.
- Continued rise in vacancies damaging the appeal and attraction of the centre.

WOODSTOCK: SWOT

186. The centre is a historic market town known for its close connection to Blenheim Palace (a UNESCO World Heritage Site and the birthplace of Sir Winston Churchill). It is defined as a town centre with a significant tourist role in the West Oxfordshire Local Plan.
187. The centre boundary largely covers Oxford Street (A44), High Street and Market Place/ Street. The centre is characterised by a mix of primarily independent retail, leisure and other complementary uses which are all predominantly housed within small-scale units.
188. Comparison retail and leisure services are the dominant uses with the centre. Combined, they occupy almost 70% of the outlets and almost 80% of the floorspace. The centre has a very low vacancy rate in terms of outlets of 5.5% when compared to the national average of 14.1%. As with Burford, the broad provision in the centre is led by small-scale independent operators that add to its vitality and charm.

189. The environmental quality of Woodstock is good, underpinned by strong heritage and history.
190. Overall, the Strengths, Weaknesses, Opportunities, Threats (SWOT) can be summarised as follows:

Strengths

- Nearby tourist attractions – Blenheim Palace.
- Strong comparison retail offer.
- Strong leisure services offer.
- Low vacancy rate (both outlets and floorspace).
- Good range of pubs and restaurants.
- Strong presence and mix of independent operators.
- Market as a driver of footfall for the centre.
- Nearby train station with connections to and from London, Oxford, Reading and Worcester
- Cycle parking provision.
- Strong character and charm with impressive architecture and historic buildings.
- Well-kept shop frontages.

Weaknesses

- Footfall down -10% from 2023 to 2024 (January to August).
- Limited provision of financial & business services.

Opportunities

- Bringing vacant units back into use, to further strengthen the centre's offer.
- Heritage guide and better coordination between centres.

Threats

- High business operating costs.
- Further decline in footfall activity.

7. RETAIL CAPACITY ASSESSMENT

192. This section sets out the results of the economic retail capacity ('need') assessment for new retail (comparison and convenience goods under former use class A1) floorspace in the District and its main centres. The capacity forecasts cover a period, from 2025 (the "base year") and aligned with the NPPF and PPG the forecasts also take account of the lifetime of the proposed plan period (2041) and the modelling goes further to 2045. The detailed economic capacity tabulations are set out in **Volume 2**. These forecasts update and supersede the findings of the Council's previous evidence-based study.

THE CREAT^e MODEL

193. The CREAT^e economic model has been specifically designed, developed and tested by the LSH team over more than 25 years to assess the capacity for and impact of new retail (convenience and comparison goods) floorspace development. The evidence-based model has helped to inform and guide plan-making and decision-taking at the local, sub-regional and regional level. In brief, the CREAT^e (Excel-based) model adopts a transparent 'step-by-step' approach in which all the key assumptions and forecasts can be easily tested. The model is underpinned by the findings of the household survey, which provides a robust understanding of shopping patterns, market shares and the trading/turnover performance of existing centres, shops and stores.
194. At the outset it has necessarily been assumed for the purpose of the capacity assessment that the local retail market is in 'equilibrium' at the base year. In other words, all existing centres/stores are broadly assumed to be trading in line with expected average ('benchmark') turnover levels. This is a reasonable approach in this case as it reflects the impact of the economic downturn and the significant growth in online sales on the trading levels and performance of retailers and stores across the UK. It also reflects the outputs of the health checks covering the main centres and shopping locations. The main challenge and focus over the short/medium term in response to market trends and the impact of rising cost inflation as well as the legacy of the COVID-19 pandemic will be to retain existing occupiers and to redevelop/repurpose vacant retail floorspace to attract new businesses and uses.
195. In simple terms, any residual expenditure available to support new retail floorspace over the forecast period will be generated by the difference between the forecast growth in 'current' (survey-derived) turnover levels and the growth in 'benchmark' turnovers based on applying robust year-on-year 'productivity' ('turnover efficiency') growth rates to all existing and new retail floorspace.
196. It is important to restate that medium to long term forecasts should be treated with caution, as they will be influenced by the dynamic changes in economic, demographic and market trends. As described previously (see **Section 2**), the NPPF (paragraph 90) states that local planning authorities should meet the need for retail and town centre uses "**looking at least ten years ahead**". The Planning

Practice Guidance also states that given the uncertainty in forecasting long-term retail trends and consumer behaviour, assessments "**may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed**" (PPG. Paragraph 004. Reference ID: 2b-00402019072). Therefore, whilst this study assesses retail capacity up to 2045, greater weight should be placed by the local planning authority on forecasts over the next five to ten-year period.

197. The updated capacity forecasts set out in this section provide the Council with a broad indication of the (quantitative) need for new retail (comparison and convenience goods) floorspace in the LPA area and its main centres. In turn, this will inform whether there is a need to identify and allocate additional sites (over and above any already identified) to meet any forecast need, in accordance with the advice set out in the NPPF (paragraph 90).

KEY ASSUMPTIONS & FORECASTS

198. The 'baseline' capacity tabulations are set out in **Volume 2** for convenience and comparison goods. The capacity forecasts are based on the population growth projections from Experian, which are derived from the Office of National Statistics'

Base Year Population Projections

199. **Appendices 2 and 6** set out the latest base year (2025) population and projections (to 2030, 2035, 2040, 2041 and 2045) sourced from the Experian's Location Analyst Geographic Information System for the Study Area. Experian's population projections show the Study Area population (Zones 1-11) is forecast to increase by +8.3% (+14,450 people) between 2025 and 2045.

Expenditure per Capita & Special Forms of Trading (SFT)

200. **Appendices 2 and 6** set out the growth forecasts for convenience goods and comparison goods retail expenditure for the wider Study Area and zones (note: total expenditure is derived by multiplying the population and average expenditure per capita levels together). The base year average expenditure figures have been derived from our in-house Experian GIS (note: all monetary and turnover values are expressed in 2022 prices). In identifying expenditure per capita, an allowance has been made for the market share of non-store retail sales (i.e., Special Forms of Trading) at the base year informed by the results of the household telephone interview survey. These SFT market shares have been 'adjusted' to take account of goods sourced from traditional ('physical') retail space based on Experian's latest Retail Planner Briefing Note 21 (February 2024) (RPBN21). The adjusted baseline SFT market shares from the household survey in 2024 are 33.8% for comparison goods and 5.2% for convenience goods and are forecast to increase to 41.3% and 7.4% respectively by 2045 based on the growth rates forecast by the RPBN21.

Average Expenditure Growth Forecasts

201. The growth in average expenditure per capita levels to 2045 has been informed by the forecasts set out in Experian's RPBN21 (as described in detail in **Section 3**). Experian's forecasts show a fall in convenience goods spend in 2025 (-0.2%) and annual (per capita) growth over the medium to long term "flatlining" at around +0.1% up to 2040; this has then been applied to the period to 2045. For comparison goods and following the forecast growth for 2025 of +2.7%, Experian predict that (per capita) growth in comparison goods spend will settle at around +3.1% by 2030 and +2.8% per annum on average up to 2040; this rate of growth has been applied to the period to 2045.

Total Available Expenditure

202. For convenience goods retailing there is a forecast +7.9% (+£37.4m) growth in total available expenditure between 2025 and 2045 across the widely defined Study Area (Zones 1-11) (refer to **Table 3, Appendix 2**).
203. The forecast growth for comparison goods retailing is higher than for convenience goods. The forecasts show a +73.8% (+£370m) growth in total comparison goods expenditure by 2045 across the Study Area (refer to **Table 3, Appendix 6**).

Market Share Analysis (excluding SFT)

204. The capacity assessment is informed by the survey-derived market shares for all stores and centres across the widely defined study area. A key step in the economic capacity assessment involves allocating the baseline convenience and comparison expenditure (£ million) to the identified centres, stores and floorspace based on the market shares. This helps to establish the current trading performance of the main centres and stores within the District area and zones based on expenditure allocated from the study area only.
205. For the purpose of the retail capacity assessment, and in line with standard approaches, the market shares reported in **Section 4** have been recalibrated for both convenience goods (**Table 1, Appendix 4**) and comparison goods (**Table 1, Appendix 8**) to exclude SFT. The 'baseline' (2025) turnovers are projected forward to 2030 (Table 2), 2035 (Table 3), 2040 (Table 4), 2041 (Table 5) and 2045 (Table 6) and assuming no changes in market shares (note: The 'constant market share approach' is standard practice for strategic retail capacity assessments. This approach does not take account of the potential impact that new retail investment and development (both within and outside the LPA area) can have on existing shopping patterns, market shares and turnover performance over time). It should be noted that no allowance is made at this stage for any potential 'inflow' (trade draw) of expenditure to centres and stores from outside the defined study area.

'Inflow' / Trade Draw

206. The assessment of the 'inflow' (trade draw) from outside the widely defined Study Area are based on informed judgements that consider the relative:
- scale, quality and mix of retail provision across the centres in the District, based on the results of the healthchecks;
 - location of all other centres and stores in the District area, including out-of-centre shopping locations;
 - competition from centres, stores and shopping facilities outside the study area, as informed by the results of the survey-derived market share analysis;
 - the likely retail expenditure derived from people visiting the District's shops and stores, but who live outside the study area (including tourist, visitor and commuter spend); and
 - the assumptions and judgements set out in previous evidence-based studies and retail assessments.
207. Considering the tourist draw of the District it is likely that there will be trade from outside the defined study area. This will be particularly applicable to centres with a tourist draw such as Witney, Burford and Woodstock, then the smaller centres that generally serve the needs of their more local resident catchment populations. Furthermore, centres such as Carterton with a strong military presence is likely to draw trade from personnel and visitors from beyond the study area.
208. Typically, the 'inflow' of convenience goods expenditure to the main centres and stores from outside the wider study area is more limited than for comparison goods, as households generally carry out their main food shop at their more local and convenient stores, and do not normally travel longer distances for food purchases. Notwithstanding this, a reasonable allowance should be made for inflow associated with good accessibility and transport across the District and also to take account of visitors/tourists.

Total Forecast Turnover

209. Based on the (survey-derived) market analysis and 'inflow' assumptions, **Table 2 (Appendix 5)** sets out the overall convenience turnover estimates for the main centres and stores in the District and **Table 2 (Appendix 9)** details the comparison turnover estimates.
210. The table below summarises the 2025 ('base year') total turnover estimates. It shows that Witney Town Centre is forecast to achieve a total turnover of £150.9m in 2025, of which approximately 70% is accounted for by comparison goods sales. In relation to Chipping Norton, the equivalent total is £50.1m with an almost equal split in sales between convenience goods (49%) and comparison goods (51%). Carterton achieves £89.9m in total, with sales being driven by its strong convenience led provision (84%). All other local centres shops and stores elsewhere in the District also show a high level of sales with convenience goods accounting for some 80% of this total. This pattern is also seen in the out-of-centre provision that has the highest total turnover £137.5m of which convenience goods accounts for 68% of this total.

Table 11: Forecast Base Year (2024) Turnover of Centres/Stores (£m)

WEST OXFORDSHIRE DISTRICT AREA	Convenience Goods	Comparison Goods	Total Turnover
TOWN CENTRE: WITNEY	£45.1	£105.8	£150.9
TOWN CENTRE: CHIPPING NORTON	£24.4	£25.7	£50.1
TOWN CENTRE: CARTERTON	£75.3	£14.6	£89.9
TOWN CENTRE: BURFORD	£2.3	£2.4	£4.7
TOWN CENTRE: WOODSTOCK	£2.7	£2.1	£4.8
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	£46.9	£11.4	£58.3
OUT-OF-TOWN CENTRE STORES / LOCATIONS	£93.1	£44.4	£137.5
TOTAL WEST OXFORDSHIRE DISTRICT AREA	£289.7	£206.4	£496.1

Floorspace Productivity

211. A key input to the retail capacity assessment is the application of a year-on-year floorspace 'productivity' growth rate to all existing and new retail floorspace. As described in **Section 3**, existing retailers will need to achieve higher annual 'productivity' growth rates to cover their increasing costs (including, for example, rising rents, business rates and wages), in order to remain profitable and viable over the short, medium and long term. This is particularly the case as the competition from online retailing increases; a trend that has been significantly accelerated by the impact of the pandemic.
212. For all existing and new retail floorspace we have tested annual average 'productivity' growth rates informed by Experian's latest Retail Planning Briefing Note (RPN21). These are described in more detail in **Section 3**. For convenience goods a 'productivity' growth rate of -0.2% for 2025, +0.2% for 2026-30 and +0.3% for 2030 onwards. For comparison goods the annual productivity growth rates are +1.5% for 2025, +2.8% from 2026 onwards.

Retail Commitments

213. The next step in the retail capacity assessment takes account of all the major retail (convenience/ comparison) floorspace commitments and planned development at the time of preparing this study. The assessment of pipeline floorspace and the predicted turnover of this new floorspace. All planned and pipeline floorspace commitments have been provided by the Council.
214. **Appendix 5** for convenience goods floorspace and **Appendix 9** for comparison goods sets out the floorspace commitment. This has been identified as the following:
- Planning Ref No. **23/01203/RES**. Land East off Isabelle Spencer Way, Witney, Oxfordshire. Reserved matters approval for local centre and associated infrastructure pursuant to outline permission 12/0084/P/OP. Assumed a gross to net ratio of 70% results in a net floorspace of 602 sqm. Of this net floorspace, it is assumed that it will be split evenly between comparison (301sqm net) and convenience goods (301 sqm net).

RETAIL CAPACITY FORECASTS

215. The following sets out the convenience and comparison goods capacity forecasts for the main centres and stores over the forecast period, up to 2045. Whilst the forecasts are provided to 2045, the NPPF (paragraph 90d) is clear that local planning authorities should plan to meet the need for new retail and town centre uses by “*looking at least ten years ahead*”. The PPG also states that given the uncertainty in forecasting long-term retail trends and consumer behaviour, assessments “...*may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed.*”
216. The detailed capacity tabulations for convenience and comparison goods are set out in **Appendices 5 and 9**. The capacity findings show the following:

Table 12: Retail Floorspace Capacity Forecasts (sqm net)

Convenience Goods					
WEST OXFORDSHIRE DISTRICT AREA	2030	2035	2040	2041	2045
TOWN CENTRE: WITNEY	-288	-278	-259	-254	-223
TOWN CENTRE: CHIPPING NORTON	7	12	23	25	42
TOWN CENTRE: CARTERTON	21	38	70	79	129
TOWN CENTRE: BURFORD	1	1	2	2	4
TOWN CENTRE: WOODSTOCK	1	1	3	3	5
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	13	23	44	49	81
OUT-OF-TOWN CENTRE STORES / LOCATIONS	26	47	86	97	160
TOTAL: WEST OXFORDSHIRE DISTRICT AREA	-221	-156	-32	1	197

Comparison Goods					
WEST OXFORDSHIRE DISTRICT AREA	2030	2035	2040	2041	2045
TOWN CENTRE: WITNEY	-531	-716	-640	-580	-294
TOWN CENTRE: CHIPPING NORTON	-56	-101	-82	-68	2
TOWN CENTRE: CARTERTON	-32	-57	-47	-39	1
TOWN CENTRE: BURFORD	-5	-10	-8	-6	0
TOWN CENTRE: WOODSTOCK	-4	-8	-7	-5	0
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	-25	-45	-36	-30	1
OUT-OF-TOWN CENTRE STORES / LOCATIONS	-97	-174	-142	-117	3
TOTAL: WEST OXFORDSHIRE DISTRICT AREA	-750	-1,111	-961	-845	-287

Source: CREAT[®] Retail Capacity Model (Appendix 5 and 9, Volume 2)

217. **Convenience Goods Capacity** - There is no identified capacity for new convenience goods retail floorspace over the broad 10-year period to 2035. Forecasts at the centre level should be treated as indicative but suggest that there is very modest capacity by 2035. This potential ‘need’ should be treated with caution as it is likely that this could be accommodated within the existing stock of space, either through the reoccupation of vacant space or changes in the offer provided in existing units which would not require planning permission.

218. **Comparison Goods Capacity** - As with convenience goods, there is no identified capacity for new comparison goods retail floorspace over the broad 10-year period to 2035.
219. It should also be noted that these forecasts make no allowance for existing retail units that are currently vacant.

SUMMARY

220. To reiterate, the NPPF (paragraph 90d) is clear that local planning authorities should plan to meet the need for new retail and town centre uses by “*looking at least ten years ahead*”. The PPG also states that given the uncertainty in forecasting long-term retail trends and consumer behaviour, assessments “...*may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed.*” Therefore, whilst greater weight should be placed on forecasts over the next five to ten-year period, we have also assessed the potential capacity for new retail floorspace over the lifetime of the plan, up to 2041, and beyond to 2045, to help inform both Council’s longer-term plan-making and strategies.
221. As shown, the forecasts indicate that there is no immediate global capacity for both convenience and comparison goods to 2035.
222. A robust policy approach should therefore be adopted, especially development management policies in accordance with the NPPF (paragraphs 90 - 95), to enable the assessment and determination of future proposals that are not in a centre and not in accordance with an up-to-date development plan. It particularly emphasises the importance of the sequential test and having robust locally set impact thresholds, in compliance with the NPPF and NPPG, to ensure that edge and/or out-of-centre proposals do not result in any significant adverse impacts on existing centres.

8. COMMERCIAL LEISURE NEEDS ASSESSMENT

223. This section focuses on the potential need for new leisure uses and facilities in the Council area over the period to 2041 and beyond to 2045.
224. This assessment necessarily focuses on the main leisure, entertainment and cultural uses identified by the NPPF (Annex 2). These uses are widely accepted as making a significant contribution to the overall vitality and viability of town centres and should be located in town centres first in accordance with national and local plan policy objectives.
225. This assessment focuses on the main leisure, entertainment and cultural uses identified as town centre uses in the NPPF (Annex 2), namely:
- “...leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); ... and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).” (NPPF, Annex 2)*
226. The Government’s 2020 reform of the Use Classes Order classified the main food and beverage, commercial leisure and cultural uses as follows:

Table 13: 2020 Use Classes Order Update

Original Use Class	Revised Use Class:	Use:	Description:
Class A3	Class E (b)	Restaurants and cafés:	Defined as selling food and drink for consumption on the premises.
Class A4	Sui Generis	Drinking establishments:	Includes public houses, wine bars or other drinking establishments (but not night clubs), and drinking establishments with expanded food provision
Class A5	Sui Generis	Hot food takeaways:	Defined as the sale of hot food for consumption off the premises.
Class D1	Class F.1	Non-residential institutions:	Includes art galleries (other than for sale or hire) and museums.
Class D2	Sui Generis	Leisure/Recreation (indoor/outdoor)	Cinemas, music and concert halls, bingo and dance halls
Class D2	Class E (d)	Leisure/Recreation (indoor/outdoor)	Gymnasiums or area for indoor recreations.
Class D2	Class F.2	Leisure/Recreation (indoor/outdoor)	Indoor or outdoor swimming baths, skating rinks and outdoor sports/recreations.
Sui Generis	Sui Generis	A use on its own	Theatres, nightclubs, casinos

Source: Town and Country Planning (Use Classes) Order 1987 (as amended) and Revised Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757).

227. It is important to understand at the outset that forecasting the need for new leisure uses is more problematic than for retailing, as the sector is highly complex and dynamic. For example, the demand for existing and new leisure uses and facilities is particularly sensitive to changes in economic, demographic, lifestyle and fashion trends. Consequently, the methods developed to forecast the need for new leisure uses are necessarily more flexible, qualitative and high level. In this context LSH

has developed robust and transparent approaches to assess leisure needs based on the following key inter-related workstreams:

- A review of the key trends driving expenditure growth and market demand in the leisure sector over the last decade.
- An audit of existing leisure provision to help identify any significant 'gaps' in provision.
- A review of current leisure participation rates and preferences across the study area based on the results of the household survey.
- The application of a robust economic/quantitative need assessment for some leisure groups based on accepted approaches.

228. This section provides a summary of the key leisure trends, current provision and participation to help identify the potential (quantitative and qualitative) need for new uses and facilities over the plan period. As with the retail capacity assessment, all leisure need forecasts should be treated with caution as they are subject to dynamic market and lifestyle trends and changes in the market demand and investment preferences of leisure operators.

COMMERCIAL LEISURE TRENDS

229. Following a dramatic -35.4% fall in leisure spend per head in 2020, Experian forecasts showed a return to growth in 2021 (+28.6%) but a drop to -1.3% in 2023 and -0.3% in 2024. Thereafter there is nominal forecast growth of +0.6% in 2025 with growth averaging between 0.8% and 1.1% over the long term to 2040 and beyond. These expenditure growth trends, and forecasts, have informed the updated leisure needs assessment. Any further dampening of growth rates over the short to medium term will have implications for the viability of existing leisure businesses and the demand for new space.
230. The demand for leisure is currently dependent on broader economic conditions and prevailing consumer confidence. The key issues for commercial leisure provision encompasses a number of factors, particularly:
- macro-economic and resulting consumer sentiment (e.g. income growth, rising cost inflation, cost of living crisis);
 - the rise in home working and benefiting local locations and businesses;
 - changing consumer tastes and preferences (e.g. younger generation drinking less alcohol; prioritising experiences and prioritising spend)
 - rise of home delivery; and
 - the increase in the use of open spaces and pursuits.
231. Continuing uncertainty over inflation, increase in national insurance contributions, future regulation and staffing levels is said to be causing a "crisis of confidence" among business owners, which has fallen to a lower level than at any point during the pandemic. The vulnerability of the sector due to soaring energy costs, crippling rises in the cost of goods and dampening consumer confidence is likely to affect the sector over the next few years further.

WEST OXFORDSHIRE DISTRICT EVENING ECONOMY

232. The District offers a diverse evening and night time economy in the context of its:

- **Historic Character:** the traditional character of the Districts' centres provide a blend of historic settings and contemporary leisure provision that draws residents and visitors with diverse socialising options. For example, Blenheim Palace, a UNESCO World Heritage Site, plays a pivotal role in Woodstock's evening economy hosting various events including:
 - A Christmas Light Trail
 - Seasonal Events including food festivals, flower shows, and sporting events like the Blenheim Palace Triathlon
 - Nocturne Live, an open-air concert during the summer period.
 Additionally a number of centres in the district have an attractive historic streetscape such as Burford with Georgian architectural character, making them appealing destinations.
- **Diverse Offerings:** From traditional pubs to modern bars and gastro pubs, the District offers a range of options catering for diverse tastes. For example:
 - Woodstock: The Aviary Bar and the Nest restaurant within the recently refurbished Feathers Hotel provides contemporary British cuisine; additionally, The Back Lane Tavern was recognized as the 'Best Gastro Pub' at the 'Oxinabox' Awards in 2024.
 - Late night venues in Witney include The Little Sandy's live music bar and the Blind Tiger cocktail bar.
 - The Bull Hotel in Burford – a 16th-century inn has been transformed into a contemporary hotel with two restaurants and a cocktail bar.
 - The Farmer's Dog in Burford that opened in August 2024 by television celebrity Jeremy Clarkson, this pub emphasises local British produce and features a bar, farm shop, butchers, and an additional bar in a large marquee.
- **Local Focus & Co-ordination:** For example the local 'Wake Up To Woodstock' (WUTW) non-profit organisation has been instrumental in enhancing the town's evening economy. The WUTW comprises around 66 local businesses, including pubs, restaurants, and hotels. The association organizes events including Woodstock Live, A Night of a Thousand Candles, and the Woodstock Festive Fayre, all aimed at attracting visitors and enriching the local community.
- **Arts and Culture:** For example, Chipping Norton provides a cultural focus with the following:
 - The Living Room Cinema: features two screens and a bar, offering a contemporary cinematic experience that enhances the town's entertainment options.

- The Theatre Chipping Norton: serves as a theatre, cinema, gallery, and music space. Housed in a former Salvation Army citadel, it hosts original productions, touring companies, films, and exhibitions.
- Furthermore the Cineworld Witney, located in the Marriotts Walk leisure and retail development, features five screens and benefits from convenient parking and nearby dining options.

233. Overall, the evening and night time economy provides a diverse mix of activities. This is of a scale that is commensurate with a locally driven focus providing an diverse experience for both locals and visitors alike.

LEISURE EXPENDITURE GROWTH

234. The leisure sector has experienced significant growth in consumer and market demand since the mid-1990s; fuelled by a buoyant economy, growing disposable income and low unemployment levels. Although the sector has been significantly impacted by the pandemic, the fact is that leisure and entertainment activities remain an important lifestyle and entertainment choice for many consumers over other areas of spending.
235. Average spend on leisure services is dominated by Food and Beverage ('F&B'), which includes cafés, restaurants and bars. F&B accounts for approximately 53.3% of all average spend per capita on leisure services in the Study Area (Zones 1-11).

Table 14: Estimates of Expenditure per Capita on Leisure Services (2025)

Zone	Accommodation	Cultural services	Games of chance	Hairdressing salons & personal grooming	Recreational & sporting services	Restaurants, cafes, etc.	Total
Zone 1	£341	£466	£182	£109	£273	£1,824	£3,196
Zone 2	£361	£491	£195	£103	£298	£1,647	£3,096
Zone 3	£331	£468	£179	£117	£276	£1,586	£2,957
Zone 4	£443	£544	£219	£111	£341	£1,855	£3,513
Zone 5	£393	£508	£204	£118	£313	£1,835	£3,371
Zone 6	£428	£526	£223	£122	£345	£1,815	£3,457
Zone 7	£408	£521	£207	£108	£321	£1,691	£3,255
Zone 8	£415	£531	£221	£119	£313	£1,829	£3,427
Zone 9	£434	£540	£207	£105	£304	£1,781	£3,370
Zone 10	£487	£578	£224	£105	£326	£1,981	£3,700
Zone 11	£444	£553	£225	£110	£348	£1,775	£3,456
Study Area Average (£)	£408	£521	£208	£111	£314	£1,784	£3,345
(% of Total)	12.2%	15.6%	6.2%	3.3%	9.4%	53.3%	100.0%

LEISURE EXPENDITURE FORECASTS

236. The table below shows the most recent leisure spend projections by Experian Business Strategies (EBS) as set out in Retail Planner Briefing Note 21 (February 2024).

Table 15: Actual & Forecast Growth in UK Leisure Spend (% per annum)

	2018	2019	2020	2021	2022	2023	2024	2025	2026-30	2031-40
Leisure Spend Growth (%)	-0.9%	0.1%	-35.4%	28.6%	21.3%	-1.3%	-0.3%	0.6%	1.1%	0.8%

237. The base year expenditure per capita levels for leisure have been projected forward to 2045 using Experian's forecast annual growth rates above and then applied to the projected population for each Study Zone to identify the total available expenditure on leisure and recreation goods and services.
238. This results in total available leisure expenditure in 2025 of £570.7m in the Study Area (see table below).

Table 16: Study Area: Total Forecast Growth in Commercial Leisure Expenditure: 2025 – 2045 (£m)

Zone	2025	2030	2035	2040	2041	2045	Change: 2025-2041	Change: 2025-2045	Change: 2025-2041	Change: 2025-2045
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(%)	(%)
Zone 1	114.2	122.4	129.5	137.2	138.9	145.5	24.7	31.3	21.6%	27.4%
Zone 2	29.4	31.4	33.1	34.9	35.2	36.7	5.9	7.3	20.0%	25.0%
Zone 3	74.2	80.3	85.1	90.3	91.3	95.8	17.1	21.6	23.1%	29.1%
Zone 4	44.5	49.4	53.2	57.2	58.0	61.8	13.5	17.3	30.3%	38.9%
Zone 5	44.4	48.0	50.8	54.0	54.7	57.3	10.2	12.8	23.0%	28.9%
Zone 6	45.6	48.9	51.6	54.3	54.9	57.4	9.3	11.7	20.4%	25.7%
Zone 7	48.4	52.4	55.4	58.6	59.3	62.1	10.8	13.6	22.4%	28.2%
Zone 8	65.3	70.7	75.3	79.6	80.6	84.6	15.3	19.4	23.4%	29.7%
Zone 9	47.0	51.2	54.6	58.0	58.6	61.7	11.6	14.7	24.6%	31.3%
Zone 10	32.6	35.5	37.7	40.0	40.5	42.6	7.8	10.0	24.0%	30.5%
Zone 11	25.0	26.7	28.1	29.5	29.7	30.9	4.7	5.8	18.7%	23.4%
Study Area (Zones 1-11) (£)	570.7	616.8	654.3	693.7	701.6	736.3	131.0	165.6	23.0%	29.0%

239. Applying the most recent year-on-year leisure spend growth rates sourced from Experian Business Strategies to the population projections results in an increase in total available commercial leisure expenditure across the defined Study Area (Zones 1-11) of +23% (+£131m) by 2041 and +29% (+£165.6m) by 2045.
240. The table below breaks down the growth in leisure expenditure by category. It shows that F&B expenditure between 2025 and 2041 in the study area (Zones 1-11) is forecast to increase by +£70.5m (accounting for 54% of the total) followed by cultural services (15%).

Table 17: Study Area: Total Forecast Growth in Commercial Leisure Expenditure: 2025 – 2045 (£m)

	Study Area: Total Available Leisure Spend (£m)						Change: 2025-2041	Change: 2025-2045	Change: 2025-2041	Change: 2025-2045
	2025	2030	2035	2040	2041	2045	(£m)	(£m)	(%)	(%)
Accommodation	£67.9	£73.4	£77.9	£82.5	£83.5	£87.6	£15.6	£19.7	23.0%	29.1%
Cultural services	£88.1	£95.2	£101.0	£107.1	£108.3	£113.7	£20.2	£25.6	23.0%	29.0%
Games of chance	£35.0	£37.9	£40.2	£42.6	£43.1	£45.2	£8.0	£10.2	23.0%	29.0%
Hairdressing salons & personal grooming	£19.4	£21.0	£22.3	£23.6	£23.9	£25.0	£4.4	£5.6	22.9%	29.0%
Recreational & sporting services	£52.9	£57.1	£60.6	£64.3	£65.0	£68.2	£12.1	£15.3	22.9%	29.0%
Restaurants, cafes, etc.	£307.4	£332.2	£352.4	£373.6	£377.9	£396.6	£70.5	£89.2	22.9%	29.0%
Total	570.7	616.8	654.3	693.7	701.6	736.3	£131.0	£165.6	23.0%	29.0%

241. Against this background of significant forecast leisure expenditure growth over the plan period, the following assessment identifies the potential quantitative and qualitative need for new commercial leisure uses in the centres across the District.

EATING AND DRINKING OUT

242. The food and beverage (F&B) sector includes restaurants, cafés, bars and pubs (former Class A3-A5). These uses are an integral to a town centre's wider offer and economy. A good choice and quality of F&B uses can help to complement other town centre uses, by generating trips, stretching 'dwell times' (i.e., the time people spend in centres), increasing 'linked' expenditure to other shops and businesses as part of the same trip, and strengthening both daytime and evening economies.
243. As identified previously, the F&B sector dominates average household expenditure and participation in leisure across the Study Area. Spend on F&B is also forecast to experience the greatest growth over the period to 2045. In theory, this expenditure growth should support the potential to enhance the scale, quality and choice of F&B uses across the District area. In reality though, this growth will be determined by current and future trends in the sector and market demand.
244. Research shows that the multiple chains mainly dominated the expansion of the F&B sector up to 2017 when they accounted for almost half of all net new business openings. However, since 2017 a number of multiples in the casual dining sector have struggled against a backdrop of increased competition, rising costs and a tightening of consumer spending due to wider economic concerns. The reality is that too many F&B operators expanded too quickly into increasingly marginal locations, funded by private equity, and the market became saturated and unsustainable. However within the context of the District, the growth of multiple chains has been less and has been dominated by independent local operators. The growth in the availability, convenience and speed of home deliveries driven by innovative technology and apps represents a further significant challenge to more traditional F&B operators.

245. These new challenges and pressures have resulted in a radical restructuring of businesses across the sector, resulting in the closure of many loss-making branches. It is likely that there will be an increase in business failures and closures during 2025/26 as the impact of the pandemic, cost of living and energy costs on sales, profit margins and rising debts deepens. Experts predict that this further “shakeout” in the sector will leave the proactively managed multiple and independent businesses that have strong brand loyalty and/or a clear differentiated offer as the main “winners”.
246. F&B operators, like retailers, will also need to understand and cater for the needs of the changing demographic and consumer market to remain relevant and viable. For example, Millennials (under 35s) make-up almost one-quarter of the UK population and research shows that they spend a substantial 13% of their disposable incomes on eating and drinking out. It is estimated that Millennials will make up over 80% of all parents in the UK over the next few years, meaning that restaurants, pubs and cafés will also need to evolve and adapt to cater for the changing needs of new ‘Millennial families’. This could be driven for example, by increasing emphasis on convenience, affordability, entertainment, uniqueness and the use of technology and apps.
247. Restaurant operators will therefore, as a minimum, need to make sure that they are easy to reach online and on social media with up-to-date menus and strong images, and adapt the latest technologies to drive online booking.
248. The popularity of street food, market halls and “meanwhile”/ “pop-up” restaurants and bars is largely driven by Millennials and subsequently demographic cohorts from 1997 onwards. These more informal drinking and eating venues fulfil their desire to experiment and explore distinctive styles of drink, food and new cuisines in exciting new and more informal environments. Trialling a “pop-up” site also represents an opportunity to test a new concept, gain a following, fine-tune details and secure investment before making a long-term commitment. The pop-up concept is also attractive to landlords and property companies who are increasingly nervous about signing long leases following numerous high profile restaurant closures.
249. The household survey identified where people living in the Study Area currently chose to eat and drink (see below). This shows that across the Study Area (Zones 1-11), venues across the District are attaining a market share of between 59.1% (Cafes and Restaurants) and 59% (Bars, Pubs, Nightclubs) which is a good level of retention. Withing the District, the dominant location is Witney Town Centre. In terms of competing centres, the dominant centre is Oxford followed by Banbury.

Table 18: Market Shares for Eating Out Locations (%)

	Study Area: Zones 1-11	
WEST OXFORDSHIRE DISTRICT AREA	Cafes & Restaurants	Bars, Pubs, Nightclubs
Town Centre: Witney	30.0%	24.7%
Town Centre: Chipping Norton	8.2%	4.8%
Town Centre: Carterton	7.5%	6.6%
Town Centre: Burford	2.6%	0.7%
Town Centre: Woodstock	2.9%	5.0%
All Other Locations in the District Area	8.0%	17.2%
WEST OXFORDSHIRE DISTRICT AREA	59.1%	59.0%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT		
Abingdon	0.9%	1.0%
Banbury	4.2%	3.3%
Bicester	0.9%	0.0%
Central London	1.7%	1.3%
Cheltenham	0.1%	0.1%
Faringdon	1.3%	0.9%
Kidlington	1.8%	1.1%
Moreton-in-Marsh	2.7%	1.8%
Oxford	11.9%	9.2%
Stratford-upon-Avon	0.8%	0.5%
Swindon	1.0%	0.4%
Wantage	0.0%	0.1%
All Other Centres/Locations	13.5%	21.3%
ALL OTHER LOCATIONS	40.9%	41.0%
TOTAL	100.0%	100.0%

250. Drawing on these market shares and retention levels, it is possible to carry out a high-level assessment of the potential need for new food and beverage uses over the plan period using a robust approach developed by LSH. This involves applying the F&B retention level of 59.1% to the available F&B spend of £307.4m in 2025 (see table below). This results in a 'retained' F&B expenditure (or 'turnover') of £181.6m in 2025 which is forecast to increase to £234.3m by 2045.

Table 19: Total Leisure Spend Across Study Area (£m): 2025 – 2045

Study Area (Zones 1-11)	2025	2030	2035	2040	2041	2045
Available Spend on F&B:	£307.4	£332.2	£352.4	£373.6	£377.9	£396.6
Participation Levels (%)	59.1%	59.1%	59.1%	59.1%	59.1%	59.1%
Market Share (£m)	£181.6	£196.3	£208.2	£220.7	£223.3	£234.3
Benchmark Turnover (£m)	£181.6	£194.7	£205.6	£217.2	£219.6	£229.4
Net Residual F&B Spend Capacity	£0.0	£1.6	£2.6	£3.5	£3.7	£4.9

251. Using a similar approach as for the assessment of retail capacity, we have applied a robust year-on-year 'productivity' (sale 'efficiency') growth rates detailed in the

Retail Planner Briefing Note 21 – Leisure (2024) to the retained turnover of £181.6m in 2025 to allow for existing businesses to cover their reasonable costs over time to remain viable. This results in a theoretical nominal residual expenditure of £2.6m up to 2035.

252. As detailed previously this is a sector that has been hit hard prior to, and even more so, during the pandemic and the prevailing macro-economic position will also influence discretionary leisure spending. The sector was effectively shut down and carried high overheads. On this basis, it can be reasonably assumed that a proportion of this growth is likely to be absorbed by existing businesses to cover the debt incurred during the pandemic and thereafter the rising operational / occupancy costs and compounding inflation.
253. It should be emphasised that the growth to sustain new cafés, restaurants and bars will be very much subject to market demand. Focusing new uses in the main town centres will help increase competition and consumer choice, and to underpin both daytime and evening economies. Any market demand from operators is likely to be satisfied by the take-up of suitable vacant units in existing centres, the repurposing of floorspace and/or as part of mixed-use developments.
254. This is further confirmed by the responses to the household survey which do not show a significant demand. In response to the question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more often (Question 44), the responses suggest a general level of contentment with the offer. Only 3.7% stated 'more / better cafes / coffee shops'; 2.3% stated 'more / better pubs / bars'; 2.1% suggested 'more family-friendly pubs / restaurants'; 1.7% stated 'more / better restaurants'; and 0.5% 'more pavement cafes'.

CINEMAS

255. The UK cinema sector has evolved dramatically since the 1990s when it was largely dominated by a handful of national multiples. Today the sectors offer ranges from larger multiplexes (any cinema with five screens or more, though some of the largest multiplex sites have as many as 12 or 16 screens), to smaller independent operators and 'pop up' venues.
256. Although year-on-year admissions and box-office takings are notoriously volatile - driven by the appeal of individual films and Hollywood 'blockbusters' - the long-term trend since the mid-1980s has been upward and has principally been driven by the development of new cinemas. The growth in the cinema sector over the last 10-20 years is even more impressive when one considers that this has occurred against the increase in new and sophisticated in-home entertainment, driven by innovative technology, choice and flexibility (including online streaming platforms , for example, Sky, Netflix and Amazon Prime, Apple TV and Disney+ platforms).
257. There has also been a growth in smaller cinemas (e.g. The Living Room in Chipping Norton) serving smaller catchment areas. These cinemas are more flexible and less "space-hungry," as they do not require large auditoriums. There are therefore opportunities to provide a modern cinema offer in existing

(repurposed) buildings and shopping centres, or as part of a mixed use offering. Other trends in the sector include the growth of 'pop-up' cinemas. Although there appears to be no dependable or recent data on the UK 'pop-up' cinema market.

258. The pandemic hit the cinema industry hard, particularly for the major chains. As previously mentioned, smaller nimble operators have found novel ways to show films. A temporary or mobile cinema (referred to as a pop-up cinema) such as drive-in cinemas (e.g. Blenheim Palace Cinema, Woodstock) and UK's smaller independent chains, Curzon, Picture House (which is owned by Cineworld) and Everyman fared much better during the pandemic. They showed a more diverse selection of films, and with high-quality food offering, fully stocked bars and high-end seating, attracting more visitors during periods in which restrictions have eased.
259. The future growth in the sector is dependent on the levels of available discretionary spending. Cinema trips will remain a significant and popular leisure activity for all age groups. Notwithstanding this, the competition from home entertainment and alternative at-home film channels will intensify and cinema operators will have to keep updating and adapting their offer to respond to consumer needs.
260. The current commercial cinema provision within the District comprises of 8 screens as follows (Cineworld, Marriotts Walk, Witney – 5 screens; The Living Room, High Street, Chipping Norton – 2 screens; The Theatre, Spring Street, Chipping Norton – 1 screen).
261. It is also acknowledged that there is other provision in the District, which is either of an occasional / temporary nature or not commercial. This includes:
 - The Electric Barn Cinema, Soho Farmhouse, Chipping Norton – is a private members venue;
 - Blenheim Palace Cinema, Woodstock - is a temporary outdoor summer venue with one mobile screen; and
 - Eynsham Village Hall Cinema – is a village hall venue with a projector screen.
262. The table below shows the most popular cinemas in the District and wider Study Area (Zones 1 – 11) based on the household survey market shares:

Table 20: Popular Cinema Venues Based on Survey-derived Market Shares(%)

WEST OXFORDSHIRE DISTRICT AREA		Study Area Zones 1-11
Cineworld, Marriotts Walk, Witney	41.4%	
The Living Room, High Street, Chipping Norton	6.3%	
The Theatre, Spring Street, Chipping Norton	3.4%	
The Electric Barn Cinema, Soho Farmhouse, Chipping Norton	0.0%	
Blenheim Palace Cinema, Woodstock	0.7%	
Eynsham Village Hall Cinema	0.1%	
WEST OXFORDSHIRE DISTRICT AREA	51.8%	
OTHER VENUES OUTSIDE WEST OXFORDSHIRE DISTRICT		
Abingdon - The Abbey Cinema,	2.4%	
Banbury - The Light, Spiceball Park Road	12.3%	
Bicester - Vue, Pioneer Centre	5.4%	
Oxford - Curzon, Westgate Shopping Centre	2.0%	
Oxford - Odeon, George Street	3.1%	
Oxford - Phoenix Picturehouse, Walton Street	1.0%	
Oxford - The Ultimate Picture Palace, Jeune Street	2.6%	
Oxford - Unspecified Venue(s)	2.4%	
Oxford - Vue, Ozone Leisure Park, Littlemore	5.8%	
Stratford-upon-Avon - Everyman, Wood Street	1.6%	
Swindon - Vue, Greenbridge Retail & Leisure Park	5.6%	
All Other Venues Elsewhere	4.0%	
ALL OTHER VENUES	48.2%	
TOTAL	100.0%	

263. In summary, the key headlines are as follows:

- Venues in the District area are collectively achieving a market share of 51.8% from the wider Study Area. This market share is dominated by the Cineworld, Marriotts Walk, Witney (41.4%).
- The main competition is from venues in Banbury (The Light, Spiceball Park Road 12.3%) and Oxford with the Vue, Ozone Leisure Park attaining 5.8%. additionally, the Vue Cinema in Bicester attains 5.4%.

264. The high-level assessment of the potential need for new commercial cinema provision in the District area is based on standard approaches that draw on published national and regional 'screen density' averages (i.e., the number of screens per 100,000 population). According to the latest available research (from Dodona Research, Office for National Statistics (ONS) and British Film Institute (BFI), the current UK average is 6.9 screens per 100,000 people, which represents an increase from 6.1 screens in 2014. The equivalent average figure for the South East region is lower, at 6.5 screens per 100,000 people.

265. The table below shows the potential quantitative need for additional cinema screens to 2045 based on the population projections previously described.

Table 21: Potential Capacity for New Cinema Screens

	2025	2030	2035	2040	2041	2045
Potential Cinema Catchment Population (Zones 1-11)	89,839	91,913	93,684	95,435	95,766	97,330
Cinema Screen Density (screens per 100,000 persons) based on average for South East Region	6.5	6.5	6.5	6.5	6.5	6.5
Cinema Screen Potential	6	6	6	6	6	6
Existing: Screen Numbers	8	8	8	8	8	8
Proposed: Screen Numbers	0	0	0	0	0	0
Net Screen Potential	-2	-2	-2	-2	-2	-2

266. The key steps in the assessment of cinema capacity involve applying the market share ('retention level') for cinema trips (51.8%) to the total population at the base year (some 173,293 persons). This produces the total "cinema-going population" (some 89,839 persons in 2025). Applying the average screen density of 6.5 to this population, the forecasts show that there is no capacity for new cinema screens based on existing provision.
267. This is further confirmed by the responses to the household survey which do not show a significant demand for new cinemas. In response to the question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more often (Question 44), only 3.6% of respondents in the Study Area identified the need for "a multi-screen cinema" and 3.2% for an 'art house cinema'.
268. In summary, there does not appear to be any significant capacity or demand for new cinema provision in the District area. Any market interest and demand from cinema operators seeking representation in the area should be directed to the town centres first, to further help diversity daytime and evening economies. This also does not preclude any improvements to the existing offer.

HEALTH AND FITNESS FACILITIES

269. The health and fitness (H&F) sector as a whole was badly hit by the pandemic, with lockdowns forcing the closure of facilities. It is undeniable that the pandemic reinforced the need for outdoor activity particularly to support mental health and wellbeing. Furthermore, alternative means of exercise increased during the series of lockdowns in 2020 and 2021, including at-home workouts, digital workouts, outdoor exercise and classes, and the purchase of home gym equipment. Whilst this was an accelerated reaction to the pandemic, the long-term impact on the sector and gym memberships remains unclear.
270. The growth of the budget gym operators has also 'squeezed' the memberships and viability of some of the established mid-market chains, such as LA Fitness and Fitness First. This has resulted in the increasing polarisation of the gym sector between the budget operators at the value end of the spectrum, and the more exclusive health and fitness centres at the higher, more expensive end. As a result, analysts predict that those mid-market gym operators that are neither very cheap, nor particularly exclusive will struggle to maintain market share in the competitive marketplace unless they revise their business models.

271. In terms of fitness/health activity participation rates H&F facilities in the District area:

- Facilities are achieving a relatively good market share within the widely defined Study Area of 54.1%. Of this total, named venues with significant market shares include Carterton Leisure Centre (11.8%); PureGym, Witney (6.8%); Windrush Leisure Centre, Witney (6.2%) and Chipping Norton Leisure Centre (6.2%).
- 'Leakage' to other H&F facilities is primarily to facilities in Oxford, Banbury and Bicester as shown below:

Table 22: Study Area: Health and Fitness Market Share

	Study Area Zones 1-11
WEST OXFORDSHIRE DISTRICT AREA	
Town Centre: Witney	6.7%
Town Centre: Chipping Norton	3.3%
Town Centre: Carterton	2.8%
Town Centre: Burford	0.3%
Town Centre: Woodstock	1.2%
All Other Locations in the District Area	
Witney Lakes Resort, Downs Road, Witney	2.0%
PureGym, Ducklington Lane, Witney	6.8%
Windrush Leisure Centre, Witan Way, Witney	6.2%
Chipping Norton Leisure Centre, Burford Road, Chipping Norton	6.2%
Chipping Norton Lido, Fox Close, Chipping Norton	0.1%
The Wychwood Golf Club, Lyneham, Chipping Norton	0.2%
Carterton Leisure Centre, Broadshires Way, Carterton	11.8%
Bartholomew Sports Centre, Back Lane, Eynsham	3.2%
All Other Locations in the District Area	3.3%
WEST OXFORDSHIRE DISTRICT AREA	54.1%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT	
Abingdon	0.0%
Abingdon-The Gym Group, Fairacres Retail Park	0.8%
Banbury	0.2%
Banbury-PureGym, Banbury Cross Retail Park	1.6%
Banbury-Bannatyne Health Club, Oxford Road	2.5%
Banbury-Spiceball Leisure Centre, Cherwell Drive	4.5%
Bicester	2.3%
Bicester-Bicester Leisure Centre, Queens Avenue	0.7%
Bicester-David Lloyd, Wendlebury Road	2.4%
Bicester-PureGym, Oxford Road	2.2%
Central London	0.0%
Cheltenham	0.0%
Faringdon	0.4%
Faringdon-Faringdon Leisure Centre, Fernham Road	1.8%
Kidlington	0.9%
Moreton-in-Marsh	0.2%
Oxford	3.2%
Oxford-Buzz Gym, Westgate Shopping Centre	0.6%
Oxford-David Lloyd, Oxford Business Park	2.1%
Oxford-Ferry Leisure Centre, Diamond Place	3.5%
Oxford--Leys Pools & Leisure Centre, Pegasus Road	0.3%
Oxford-Nuffield Health, Woodstock Road	0.2%
Oxford-Oxsrads Sports & Leisure Centre, Court Place Farm	1.2%
Stratford-upon-Avon	0.6%
Swindon	0.6%
All Other Centres/Locations	13.0%
ALL OTHER LOCATIONS	45.9%
TOTAL	100.0%

272. The household survey also asked a specific question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more often (Question 44). The top three responses for the wider Study Area included: 'more leisure facilities /

activities for teenagers' (3.5%); 'more local sports & recreation facilities (football pitches, tennis courts etc)' (3.5%); and 'swimming pool- indoor' (3.1%).

Table 23: Gyms /Leisure Facilities: Suggested Improvements (%)

Gyms /Leisure Facilities: Suggested Improvements	Study Area (Zones 1-11) Market Shares
More leisure facilities / activities for teenagers	3.5%
More local sports & recreation facilities (e.g. football pitches, tennis courts)	3.5%
Swimming pool - indoor	3.1%
Leisure / sports centre	2.8%
More leisure facilities / activities for young children	2.8%
More / better health clubs / indoor gyms	1.8%
Swimming pool - outdoor	0.6%
More leisure facilities / activities for the elderly	0.4%
Swimming pool - sauna	0.4%
Outdoor gyms	0.4%
Outdoor sports centre	0.1%
Swimming pool - warmer	0.1%

273. In terms of the need for new health club/gym facilities, the population growth projected for the study area (Zones 1-11) is +7,417 by 2035, +11,433 by 2041 and +14,450 by 2045. By applying the survey-derived area participation rate for H&F activities of 54.1% within the study area results in the potential for new gym/H&F members. These are some +4,013 by 2035, +6,185 by 2041 and +7,817 by 2045.
274. Based on average membership levels for key premium gym operators (average 2,900 members per club) or a budget gym (average 3,450 members), the population projection increases will support one additional premium or budget gym by 2035; up to two premium or budget gyms by 2041; and by 2045, up to 3 premium gyms or 2 budget gyms.
275. As with other commercial leisure sectors, the take-up of any forecast need based on population growth will be dependent on market interest and the demand from gym operators for representation.
276. Translating demand for new gyms to actual floorspace will also depend on the type of gym. For example, smaller boutique and specialist independent gyms generally require smaller units of between 300-700 sqm, and budget operators generally have requirements for unit sizes of up to circa 3,700 sqm (Anytime fitness is an example of a smaller independent gym, with a floorspace requirement generally ranging from 350sqm to 650 sqm. Budget operators Pure Gym and The Gym have requirements for up to 1,850 sqm; and NRG is acquiring units of up to 3,700sqm). Enhancement of existing facilities and promotion of the provision of new gym and fitness facilities is recommended within town centres to help maintain and enhance their overall diversity and attraction, and/or focussed on transport hubs. Town centre locations also represent the most sustainable and accessible locations for the majority of the population. Meeting needs over the plan period will also have to take account of the changes in the local demographic profile and lifestyle trends. For example, facilities, clubs and classes will need to cater for a wide range of demographics including the elderly.

GAMBLING VENUES

277. Gambling represents a significant component of the leisure industry. The main sectors comprise 'games of chance' (namely bingo clubs, casinos, betting shops and amusement arcades). The latest research from the Gambling Commission Industry Statistics (published November 2024) indicates that the gambling industry in Great Britain generated a Total Gross Gambling Yield (GGY) for the year end to March 2024 of £15.6bn. This represented a +3.5% increase from the previous year (£15.1bn). Remote (online) gambling accounted for £4.4bn of total GGY. The total GGY for 'Remote Casino', 'Betting and Bingo Sector' was some £6.9bn whilst for 'non-remote' (land based i.e. Arcades, Betting, Bingo and Casino) it comprised some £4.6bn.
278. The following assesses the main trends in this sector, current provision and the potential need/demand for new uses and facilities.
- **Bingo Halls** - in response to falling admissions bingo operators are increasingly taking advantage of the online market and embracing smart-phone technology through new 'app' development. This forms part of a wider trend and has fuelled the growth in 'remote/online' gambling (which includes gambling activities through the internet, telephone, radio, etc.). Bingo operators are also increasingly looking to diversify their customer profile, and are marketing their clubs at a younger, predominantly female audience. As a result, there has been an increase in the number of younger and more affluent bingo players over recent years, particularly as deregulation has enabled clubs to offer bigger (national) prizes. At the opposite end of the scale, research shows that 55-64 age group has generated the biggest growth in online gambling as more mature bingo players' switch to online bingo sites, as they grow in confidence with the modern technology. These trends have resulted in the closure of many bingo halls in centres across the UK over the last decade, and the prospects for new openings are limited.
 - **Casinos** - the latest figures published by the Gambling Commission show that non-remote casinos sector (i.e., not online) saw a £69.6 million increase of 17.2% in GGY to £865.8 million (casino games at £645.4million & casino machines at £220.3 million) over the period April 2023 to March 2024. The casino sector is dominated by two companies: the Rank Group with 67 venues has a 44% market share and Genting UK has 44 venues and a 29% market share. There has been some consolidation of the sector in the past few years, such as Rank Group's purchase of Gala Coral Casinos.
 - **Betting Shops** – According to the Gambling Commission latest data there were some 5,931 in the UK in March 2024. This is a decrease from the 6,219 in March 2022, 8,320 in March 2019 and also down from 9,111 in 2014. The decrease has been due to regulatory changes introduced in 2015 which led to a fall in revenue and profit. As gambling activities continue their shift to online channels, so the demand for physical outlets will inevitably dampen in the

future and more betting shops will inevitably close. The presence of betting shops in high streets is also a contentious issue due to the perceived social, economic and health/wellbeing impacts on individuals and households. The Government recognised that betting shops have specific impacts and in 2016 reclassified their use from Class A2 to 'Sui Generis'. This was also translated in the of the Use Classes Order came into effect on 1st September 2020. This reclassification means any change of use to a betting shop requires an application to the local planning authority for planning permission.

279. The survey-derived market shares for visits to bingo halls, casinos and bookmakers show that venues in the District area attain a low level retention of 18.7% from the Study Area (Zones 1-11) and dominated by Witney town centre.
280. The main competing locations outside of the District include Banbury (16%) and Cowley (27.4%).

Table 24: Bingo Halls, Casinos and Bookmakers - Market Shares (%)

	Study Area Zones 1-11
WEST OXFORDSHIRE DISTRICT AREA	
Town Centre: Witney	12.9%
Town Centre: Chipping Norton	0.7%
Town Centre: Carterton	1.1%
Town Centre: Burford	0.0%
Town Centre: Woodstock	3.6%
All Other Locations in the District Area	0.4%
WEST OXFORDSHIRE DISTRICT AREA	18.7%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DI	
Abingdon	0.0%
Banbury	16.0%
Bicester	0.2%
Central London	1.1%
Cheltenham	0.0%
Faringdon	0.0%
Kidlington	0.0%
Oxford City Centre	6.9%
Oxford-Cowley	27.4%
Stratford-upon-Avon	0.4%
Swindon	9.1%
All Other Centres/Locations	20.1%
ALL OTHER LOCATIONS	81.3%
TOTAL	100.0%

281. Based on current provision, market and consumer demand, there appears to be no demonstrable need to enhance existing provision to help improve competitive position and the choice of venues in the District. In response to the question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more

often (Question 44), only 2.7% stated 'casino' and 1.1% suggested a 'bingo venue'.

OTHER COMMERCIAL LEISURE

282. Other commercial leisure facilities can be grouped together under 'family entertainment venues' (FEVs), which include paid activities that appeal to adults and children (such as, for example, tenpin bowling, BMX biking, roller skating, ice skating, and similar uses).
- **Tenpin bowling** – is possibly the most popular activity in the 'family entertainment' sector. After a period of decline in the 1970s, there are currently some 320 venues in the UK according to Mintel figures. A number of the successful bowling facilities opened over the last 15-20 years (e.g., Hollywood Bowl and Ten Entertainment) tend to form part of larger leisure complexes that include multi-screen cinemas, restaurants and nightclubs. The critical mass of leisure uses "under one roof" help to underpin the viability of tenpin bowling centres, as they tend to struggle as standalone destinations. The sector is evolving from old-style bowling alleys, to modern, multi-generational entertainment centres where bowling is blended with other forms of activity alongside an enhanced dining offer. This is balanced by the growth of smaller independent specialist bowling facilities. There is currently no commercial ten pin bowling operator in the District.
 - **Trampoline Parks** - over recent years there has also been growth in other more specialist commercial leisure attractions, such as trampoline parks. Since the opening of the first indoor parks in the UK in 2014, trampolining has become one of the UK's fastest growing sport and leisure trends. It is estimated that there were some 150 parks in the UK in 2017/18, with the potential capacity for between 250-300 parks before saturation is potentially reached. This mirrors the growth in the United States and Australia, where parks first emerged in the early to mid-2000s. The main operators in this sector include Oxygen Freejumping, Ryze, and Gravity Active Entertainment. The public sector is also investing in trampoline parks, including Eastbourne Borough Council, Waltham Forest Council and Tameside Metropolitan Borough Council. In response to the broad range of "jumpers," trampoline parks are also offering a range of activities and experiences that cater to the needs of a broader demographic, including rock-climbing, ninja courses, laser tag and other social events. Within the District, commercial provision of trampolining is at Carterton Softplay & Trampoline Park.
283. The table below summarises the findings of the survey-derived market shares for trips to FEVs. The results show that venues within the District area are achieving a low market share of 20% from within the Study Area (Zones 1-11). Witney town centre is the principal location (5.3%) followed by the town centres of Woodstock (4.3%) and Carterton (3.9%); additionally, and to a lesser extent by specific named

venues such as Fairytale Farm, Southcombe (1.8%); Crocodiles of the World, Burford Road, Brize Norton (1.1%).

284. The key competing locations/venues include Oxford City Centre (24.1%), Oxford-Hollywood Bowl, Ozone Leisure Park (13.9%); Banbury Bowl (9%), Central London (4.1%) and Oxford Ice Rink, Oxpens Road (3.8%).

Table 25: Family Entertainment Venues – Market Shares (%)

	Study Area Zones 1-11
WEST OXFORDSHIRE DISTRICT AREA	
Town Centre: Witney	5.3%
Town Centre: Chipping Norton	0.4%
Town Centre: Carterton	3.9%
Town Centre: Burford	0.0%
Town Centre: Woodstock	4.3%
All Other Locations in the District Area	
Cogges Manor Farm, Church Lane, Witney	0.7%
Cotswold Wildlife Park & Gardens, Bradwell Grove, Burford	0.5%
Crocodiles of the World, Burford Road, Brize Norton	1.1%
Fairytale Farm, Southcombe	1.8%
All Other Locations in the District Area	1.9%
	0.0%
WEST OXFORDSHIRE DISTRICT AREA	20.0%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE DISTRICT	
Abingdon	0.0%
Banbury	3.4%
Banbury-Banbury Bowl, Cherwell Centre, George Street	9.0%
Bicester	2.3%
Central London	4.1%
Cheltenham	0.9%
Faringdon	0.0%
Kidlington	0.9%
Moreton-in-Marsh	1.6%
Oxford City Centre	24.1%
Oxford-Cowley	1.2%
Oxford-Hollywood Bowl, Ozone Leisure Park, Littlemore	13.9%
Oxford-Kassam Stadium, Littlemore	2.2%
Oxford-Oxford Ice Rink, Oxpens Road	3.8%
Stratford-upon-Avon	0.3%
Swindon	0.0%
Swindon-Tenpin, Shaw Ridge Leisure Park	3.7%
All Other Centres/Locations	8.6%
ALL OTHER LOCATIONS	80.0%
TOTAL	100.0%

285. In response to the question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more often (Question 44), 1.8% suggested 'ten-pin

bowling' and only 0.6% of respondents suggested a 'trampoline park'. Collectively, the notable responses to suggested improvements to FEV's were as follows:

Figure 166: Family Entertainment Venues (FEV's): Suggested Improvements (%)

FEV's Suggested Improvements	Study Area (Zones 1-11) Market Shares
Indoor soft play areas	2.7%
More leisure facilities / activities for families	2.4%
Crazy golf	2.2%
Ten-pin bowling	1.8%
Ice rink	1.7%
Increased availability for leisure activities	1.2%
Trampoline park	0.6%
Water sports	0.2%

THEATRE AND CULTURAL ACTIVITIES

286. Cultural activities include a broad range of activities that are focused on the arts and historic attractions. This assessment is concerned with the provision and potential need for theatres and museums. The District has a number of cultural venues that support the day and evening time centre economies including the Theatre in Chipping Norton and Blenheim Palace in Woodstock.
287. The household survey shows that trips to the theatre and/or music from across the Study Area (Zones 1-11), to venues in the District area results in a relatively low market share of 14.8% (dominated by Chipping Norton town centre and The Theatre attaining a market share of 13.2% collectively. Blenheim Palace attains a relatively low market share of 0.2%).
288. Other theatre and music venues outside the District area attain a substantial market share from the Study Area of 85.2%. Of this total, the majority is attributed to venues in Oxford (collectively attaining 53.1% market share of which Oxford City Centre attains 46.5%). This is followed by Central London (17.3%).

Table 27: Theatre and Music Venues – Market Shares (%)

WEST OXFORDSHIRE DISTRICT AREA	Study Area Zones 1-11
Town Centre: Witney	0.9%
Town Centre: Chipping Norton	11.7%
Town Centre: Chipping Norton-The Theatre, Spring Street	1.4%
Town Centre: Carterton	0.0%
Town Centre: Burford	0.0%
Town Centre: Woodstock	0.0%
Town Centre: Woodstock-Blenheim Palace	0.2%
All Other Locations in the District Area	0.7%
WEST OXFORDSHIRE DISTRICT AREA	14.8%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE	
Abingdon	0.1%
Banbury	0.3%
Bicester	1.3%
Central London	17.3%
Cheltenham	1.8%
Faringdon	0.0%
Kidlington	0.5%
Oxford City Centre	46.5%
Oxford-Ashmolean Museum of Art and Archaeology	2.6%
Oxford-New Theatre, George Street	3.7%
Oxford-Oxford Playhouse, Beaumont Street	0.3%
Royal Leamington Spa	0.2%
Stratford-upon-Avon	2.7%
Stratford-upon-Avon-Royal Shakespeare Theatre	0.7%
Swindon	0.9%
All Other Centres/Locations	6.5%
ALL OTHER LOCATIONS	85.2%
TOTAL	100.0%

289. In response to the question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more often (Question 44), only 0.5% suggested 'theatres'.
290. For trips to cultural venues from across the Study Area (Zones 1-11) venues in the District area attain a low market share of 12.4%. Of this share the majority 4.2% is attributed to Woodstock town centre followed by Chipping Norton town centre (3.1%) and Blenheim Palace attains a market share of 2.4%.
291. Other historic and cultural venues outside the District area attain a substantial higher market share from the Study Area of 87.6%. This is dominated by the

provision in Oxford City Centre attaining 37.9% and Central London some 21%. In terms of a named venue, the Oxford-Ashmolean Museum of Art and Archaeology attains a high individual market share of 12.8%.

Table 28: Historic and Cultural Venues – Market Shares (%)

WEST OXFORDSHIRE DISTRICT AREA	Study Area Zones 1-11
Town Centre: Witney	1.3%
Town Centre: Chipping Norton	3.1%
Town Centre: Chipping Norton-The Theatre, Spring Street	0.0%
Town Centre: Carterton	0.0%
Town Centre: Burford	0.1%
Town Centre: Woodstock	4.2%
Town Centre: Woodstock-Blenheim Palace	2.4%
All Other Locations in the District Area	1.3%
WEST OXFORDSHIRE DISTRICT AREA	12.4%
OTHER CENTRES/STORES OUTSIDE WEST OXFORDSHIRE	
Abingdon	0.5%
Banbury	1.6%
Bicester	0.0%
Central London	21.0%
Cheltenham	0.1%
Faringdon	0.0%
Kidlington	0.7%
Oxford City Centre	37.9%
Oxford-Ashmolean Museum of Art and Archaeology	12.8%
Oxford-Pitt Rivers Museum	0.0%
Oxford-Oxford University Museum of Natural History	0.0%
Royal Leamington Spa	0.0%
Stratford-upon-Avon	0.5%
Stratford-upon-Avon-Royal Shakespeare Theatre	0.0%
Swindon	0.1%
All Other Centres/Locations	12.3%
ALL OTHER LOCATIONS	87.6%
TOTAL	100.0%

292. In response to the question on what improvements could be made to the West Oxfordshire authority area's leisure offer that would make respondents visit / partake in leisure activities more often (Question 44), only 1.4% suggested 'more/better cultural facilities'; 0.3% 'museums' and 0.2% 'more art galleries'.

SUMMARY

293. This section has shown that the commercial leisure industry faces considerable challenges and pressures. It is clear that consumers are becoming increasingly selective in terms of where and how they spend their discretionary leisure expenditure. There will also be a continued increase in at-home activities due to the advances in technology such as the use virtual reality headsets. More immediately this will be further compounded by the current macro-economic challenges including rising operating costs and rising costs of living that has an impact on consumer finances. The challenge for town centres and leisure operators in the future will be how to attract customers away from their homes.
294. In summary, the leisure needs assessment based on the participation derived from the household survey and current provision has identified:
- Food and Beverage - there is limited potential for additional new cafés, restaurants and bars by 2045 based on projected population and expenditure growth. In terms of improvements, responses suggest a general level of contentment with the offer.
 - Cinemas – existing venues in the District area indicates a good level of participation (some 51.8%) with competition mainly from venues in Oxford and Banbury. The forecasts show that there is no capacity for new cinema screens based on existing provision. Furthermore, the survey responses indicate that only 3.6% of respondents in the Study Area identified the need for “a multi-screen cinema” and 3.2% for an ‘art house cinema’.
 - Gyms / Health and Fitness facilities – current venues show a good level participation of 54.1%. Leakage’ is to facilities in Oxford, Banbury and Bicester. In terms of suggested improvements, there is a wide set of responses from more leisure facilities to outdoor gyms and swimming pools. The growth in population indicates the support of one additional premium or budget gym by 2035; up to two premium or budget gyms by 2041; and by 2045, up to 3 premium gyms or 2 budget gyms.
 - Family Entertainment Venues – venues within the District area are achieving a low market share of 20% from within the Study Area. The suggested improvements to the family entertainment venues include ‘indoor soft play areas’ leisure facilities / activities for families as well specific facilities such as crazy golf and ren-pin bowling as well as an ice rink. The main competition for the District is from venues in and around Oxford city Centre and Banbury.
295. Responses from the household survey indicate that the main centres and venues in the District are not necessarily achieving a good market share of trips and activities focused on theatre (14.8%) and cultural (12.4%) attractions due to access to provision in Oxford and central London. In terms improvements to provision, only 0.5% suggested ‘theatres’, 1.4% suggested ‘more/better cultural facilities’; 0.3% ‘museums’ and 0.2% ‘more art galleries’.
296. In terms of the main competition for the District, it is Oxford and Banbury locally and for specific activities it is Central London. Meeting needs over the plan period

will also have to take account of the changes in the local demographic profile and lifestyle trends. In all cases, the potential for new commercial leisure venues, facilities and attractions will be subject to dynamic economic, market and consumer trends over time. Where demand from operators does arise for representation, this should be directed to town centres first, aligned with national and local plan policy objectives.

9. KEY FINDINGS & RECOMMENDATIONS

297. This concluding section provides high-level advice and recommendations to help the Council effectively plan and manage the vitality and viability of its centres. The National Planning Policy Framework (NPPF) specifically states that planning policies and decisions should support the role that town centres play “at the heart of local communities” and should promote the long term vitality and viability of centres *“by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters”* (paragraph 90a).
298. Aligned with the NPPF and National Planning Practice Guidance (PPG), our advice takes account of the lifetime of the emerging plan period to 2041 (and the quantitative modelling goes further to 2045) but specifically focuses on the next five-to-ten-year period. We have robustly assessed both the quantitative and qualitative need for new retail (comparison and convenience goods) floorspace and commercial leisure uses over the forecast period. These assessments have been informed by a comprehensive review and update of the dynamic economic and market trends that are impacting on the retail and leisure sectors. This includes the resulting impact of the pandemic and the implications of recent high levels of inflation and the cost of living crisis.
299. This assessment draws on a robust evidence base informed by the 1,100 household surveys conducted between November and December 2024. It also draws on updated health check assessments for the District’s town centres highlighted in **Volume 3**. These health checks are based on a series of Key Performance Indicators (KPIs), informed by the NPPG, that help identify the vitality and viability of centres, their SWOTs, and their relative role and function in the District’s network and hierarchy of centres.
300. This study also takes account of the series of reforms to the planning system issued by the Government that were made into law through the amended Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 that came into effect from 1st September 2020.
301. It is against this background, including current economic challenges that we provide the Council with our robust recommendations to help inform plan-making and decision-making over the next 5-10 years, and over the period to 2045. Our advice covers:
- the need (‘capacity’) for new retail (convenience and comparison goods) floorspace and other main leisure and town centre uses.
 - the requirement to allocate a range of suitable sites to meet the scale and type of any forecast need identified, looking at least ten years ahead (NPPF, paragraph 90d).
 - the current definition of the network and hierarchy of centres, and whether this reflects existing and future shopping and leisure trends, planned investment and regeneration strategies, and future housing growth.

- the need to update and change the definition of town centre boundaries and Primary Shopping Areas in light of the key findings and evidence, and recent planning reforms.
- the setting of a local impact assessment threshold to inform the assessment and determination of applications for new retail and leisure developments proposed outside of town centres (NPPF, paragraph 90).

REFORM OF USE CLASSES ORDER & PERMITTED DEVELOPMENT RIGHTS

302. As previously mentioned, the Government has issued a series of reforms to the planning system. These reforms principally relate to Permitted Development Rights (PDR); the Use Classes Order (UCO) and more recently the Levelling-up and Regeneration Act 2023.
303. The impact of the changes will still require the definition of a town centre boundary and a primary shopping area, or a primary 'commercial' area to be the foci for E and F Classes. Also, in most instances the former use classes can be 'translated' into the equivalent categories within the new E and F Classes. This can assist with the interpretation of policy wording and the effective use of conditions.
304. The changes have implications for the former designations of primary and secondary shopping frontages, as the control of shopping and service uses is legally less enforceable in commercial areas, as a change of use between Class E does not constitute development and will therefore not require planning permission. It should be noted that the effectiveness of frontage policies was declining before the pandemic and previous changes to the UCO.
305. Hence beyond 2024, town centres are likely to consolidate their retail and shopping role with more emphasis on place and non-transactional uses, this could include high activity-based land uses such as health and education being located in more central locations and stem previous trends of decentralisation.
306. Permitted Development Changes (Amendment No. 2) (2020) released in August 2020 (under The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020), introduced Class AA and AB that allows new residential on detached or terrace buildings in commercial or mixed-use areas (but not in conservation areas). This could potentially lead to the loss of commercial floorspace to residential.
307. Furthermore, the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 (Order) that came into force on 21 April 2021 creates a new class of permitted development right (Class MA) into the Town and Country Planning (General Permitted Development) Order 2015 (GPDO) authorising changes of use from Use Class E commercial uses to Use Class (C3) residential. The changes within the Order allow a change in the permitted use of a property or land from a use falling with Use Class E to Use Class C3 residential use where the property has:

- been in Class E use for 2 years (including time in former uses i.e. A1, A2, A3, B1, D1 or D2 now within that Class); and
 - has been vacant for at least 3 continuous months.
308. These changes replace existing retail, light industrial and office to residential rights with rights applying to all of the relatively recent Use Class E in which those uses now sit. Exercise of this right is subject to prior approval by the local planning authority and therefore is subject to some planning control. Details must be submitted relating to flooding, transport, contamination, noise amenity, natural light, fire safety and agent of change issues. The area that can be converted is capped, with a maximum size limit of 1,500 sqm of floorspace capable of conversion using the right.
309. Research conducted by LSH and REVO (Places & Spaces Reinvented: What is the Future for Our Towns, High Streets and Shopping Centres? – 2024) provides a broad indication of impact of these changes and shows that both have proved controversial and have divided opinion. On the one hand they are viewed positively by some as helping to revitalise and repurpose high streets and boost housing delivery, by making it easier to change the use of buildings and respond more flexibly to dynamic market trends and demand. On the other hand, it is argued that the reforms seriously undermine the plan-led approach to town centre regeneration and place-making. Almost half of respondents from the private sector believe that reform has had or will have a positive impact (49%), compared with the public sector (30%).
310. In response several Councils have turned to Article 4 Directions (A4Ds) to try to remove PDRs. Where correctly applied, they can help prevent “*wholly unacceptable adverse impacts*” (National Planning Policy Framework; paragraph 54) on the vitality and viability of centres through the potential loss of their primary shopping areas.
311. The implications arising from these changes both locally and nationally result in more flexibility and are likely to be focussed on the peripheral parts of existing town centres, reflecting the influence of land values, but the outcomes are unclear, particularly the likely scale of increased residential and loss of commercial space and this should be investigated and monitored further. In strategic terms, and especially for the future of town centres, the PDR deregulation is likely to add to the already high levels of uncertainty surrounding their future composition.

ARTICLE 4 DIRECTIONS

312. The latest revision to the NPPF has tightened the rules and restricts the ability of local authorities to secure Article 4 directions (A4Ds). The revised version of the NPPF (paragraph 54) tightens this scope in relation to changes of use from commercial to residential, stating that such directions should be used where they are *"necessary to avoid wholly unacceptable adverse impacts"*. These impacts *"could include loss of the essential core of a primary shopping area"*, thereby *"seriously undermining its vitality and viability"*. However, the paragraph contains the caveat that such a direction would be *"very unlikely to extend to the whole of a town centre"*.
313. The Council should be mindful of the following in considering the use of A4Ds:
- it will be difficult to restrict the use of PD rights using A4Ds;
 - restriction is likely to be more difficult for residential PD rights than non-residential, but in all cases *"robust evidence"* will be needed to justify their use;
 - there is a high bar, and the scope of any A4D which is used must be limited geographically to the smallest area possible as opposed to an entire area being covered by an A4D; and
 - in terms of this area, the Council will need to be clear with targeted evidence to show why PD rights need to be restricted e.g., loss of employment space; preserving community uses or protecting a historic area / amenity.
314. Policy for permitted development was changed in March 2024 (The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024 that came into force on 5th March 2024 (under Statutory Instruments 2024 No.141) to remove the cap on conversion sizes (previously up to 1,500 sqm) and the need for assets to be vacant (previously needed to be vacant for a continuous period of at least 3 months immediately prior to the date of the application). The changes to PDR – allowing offices of unlimited size to be converted without planning permission or the need for affordable housing – has provided an alternative use for surplus stock. As a result, it is reported that some authorities are hastening to block office-to-residential conversions and are consulting on A4Ds to limit the number of conversions.
315. In terms of retail and leisure uses our assessment of the centres within the District has not yielded any threat to commercial integrity of a retail/leisure area or particular commercial building or ground floor use that warrants this protection.

LEVELLING-UP AND REGENERATION ACT 2023

316. The Levelling-up and Regeneration Bill received Royal Assent at the end of October 2023 and officially became the Levelling-up and Regeneration Act 2023 (LURA 2023). The government proclaimed that LURA 2023 will *"speed up the planning system, hold developers to account, cut bureaucracy, and encourage more councils to put in place plans to enable the building of new homes."*

317. In relation to town centres specifically, the Act enables “*local authorities powers to instigate auctions to rent vacant commercial properties in town centres and on high streets, for leases from one to five years to attract new tenants*”. These rules “*can be exercised at the discretion of local authorities, based on their local context and need, but only on properties which have been vacant for over 12 months*”. These ‘High Street Rental Auctions’ (HSRAs) became effective from December 2024. They have been designed to bring persistently vacant premises back into use, particularly where the premises is part of wider regeneration plans and/or the landlord is being uncooperative.
318. The rules apply to commercial premises (other than premises last used as a warehouse, which are specifically exempt) and which satisfy the following criteria:
- situated in an area which a local authority has designated as being a high street or town centre. These will be areas with a high concentration of premises with high street uses. These uses include “traditional” uses associated with a high street, like shops, restaurants and pubs, as well as offices and public entertainment spaces, communal halls. Manufacturing processes are even included in high street uses as long as they are carried on near to, and compatible with, other high street uses. A local authority is required to maintain and make available to the public a list describing, and a map showing, any designations that are in force in its area.
 - unoccupied for the last year or for 366 days in the last two years,
 - suitable for high street use and
 - considered by the local authority to benefit the local economy, society or environment if occupied for high street use.
319. To execute the HSRA, the local authority is responsible for both designating their high street or town centre and identifying the suitable vacant premises. They will then issue an initial notice of intent to the landlord, followed by an 8-week grace period. If still unlet, the local authority can serve a final notice and the premises is then subject to the auction process.
320. The general consensus is that LURA, and HSRAs specifically, provide the potential to redefine our high streets and town centres through a collaborative process in which both the local authority and property owners will need to work together especially where premises have remained unoccupied for a specified duration and in combating long-term vacancies. It remains to be seen whether Local Authorities have the resources to execute the powers given and the extent to which they will be utilised and whether they are successful in revitalising high streets and town centres. Overall, these should be part of a mix of initiatives to revitalise high streets and town centres.

RETAIL NEEDS

321. The NPPF (paragraph 90d) is clear that local planning authorities should plan to meet the need for new retail and town centre uses by “*looking at least ten years ahead*”. The PPG also states that given the uncertainty in forecasting long-term retail trends and consumer behaviour, assessments “...*may need to focus on a*

limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed.” Therefore, greater weight should be placed on forecasts over the next five to ten-year period.

322. The headline retail capacity forecasts are reproduced in the table below and show no immediate capacity for both convenience and comparison goods to 2035. Over the longer period to 2041 and beyond to 2045 very nominal capacity is seen and for convenience goods only. Overall, there is therefore no requirement for the Council to allocate any new sites for retail provision.

Table 29: Retail Floorspace Capacity Forecasts (sqm net)

Convenience Goods					
WEST OXFORDSHIRE DISTRICT AREA	2030	2035	2040	2041	2045
TOWN CENTRE: WITNEY	-288	-278	-259	-254	-223
TOWN CENTRE: CHIPPING NORTON	7	12	23	25	42
TOWN CENTRE: CARTERTON	21	38	70	79	129
TOWN CENTRE: BURFORD	1	1	2	2	4
TOWN CENTRE: WOODSTOCK	1	1	3	3	5
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	13	23	44	49	81
OUT-OF-TOWN CENTRE STORES / LOCATIONS	26	47	86	97	160
TOTAL: WEST OXFORDSHIRE DISTRICT AREA	-221	-156	-32	1	197

Comparison Goods					
WEST OXFORDSHIRE DISTRICT AREA	2030	2035	2040	2041	2045
TOWN CENTRE: WITNEY	-531	-716	-640	-580	-294
TOWN CENTRE: CHIPPING NORTON	-56	-101	-82	-68	2
TOWN CENTRE: CARTERTON	-32	-57	-47	-39	1
TOWN CENTRE: BURFORD	-5	-10	-8	-6	0
TOWN CENTRE: WOODSTOCK	-4	-8	-7	-5	0
ALL LOCAL CENTRES / ALL OTHER SHOPS / STORES ELSEWHERE	-25	-45	-36	-30	1
OUT-OF-TOWN CENTRE STORES / LOCATIONS	-97	-174	-142	-117	3
TOTAL: WEST OXFORDSHIRE DISTRICT AREA	-750	-1,111	-961	-845	-287

Source: CREAT^e Retail Capacity Model (Appendix 5 and 9, Volume 2)

LEISURE NEEDS

323. A high-level assessment has been provided of the potential need for new commercial leisure uses and facilities over the next 5-10 years, and over the lifetime of the plan. Even under normal circumstance it is difficult to predict the need and demand for new leisure uses, as the sector is very diverse and highly influenced by market, lifestyle and consumer trends. Predictions as to likely future need, even over the short term (i.e. the next 2-3 years), have been further complicated by the impact of the pandemic, rising inflation and the cost of living crisis. These will have an impact on leisure expenditure trends and growth, consumer preferences and business viability.
324. Notwithstanding these caveats, commercial leisure uses are a critical part of the overall offer and attraction of centres. They make a significant contribution to their overall diversity, vitality and viability of centres, and to their daytime, evening and night-time economies (the “evening” economy generally relates to all leisure

activities that are open until around 11pm. The “night-time” economy is generally defined as businesses and activities with late night licences that are open beyond 11pm, particularly at the weekend).

325. As part of their future adaptation and growth, it is therefore important that the Council maintains and promotes diverse and flexible leisure uses, venues and events catering for a wide demographic in the main centres over the period to 2035 and beyond.
326. From a planning policy perspective therefore the key to meeting future, as yet unknown needs, will be the development of policies that can accommodate the changing needs of the sector and ones that can operate in the real world. This includes recognising that for many leisure uses the cost for entering a new market will be relatively high and, unlike retail outlets where store size can vary significantly, incremental development is unlikely if only small increases in market growth are identified.
327. It is also the case that the recent changes to the Use Classes Order mean that the main commercial leisure sector in terms of spend is Food and Beverage which encompasses both Class E and Sui Generis uses. As a result, any changing demand for restaurant and café uses is likely to be met by changing uses within the existing or committed town centre floorspace.
328. The headlines from the leisure needs assessment show:
 - Eating out in **cafés and restaurants** is a popular leisure activity with venues within the District attaining between 59.1% (Cafes and Restaurants) and 59% (Bars, Pubs, Nightclubs) market share from the Study Area (Zones 1-11). Based on expenditure growth, and after allocating a proportion of this growth to existing businesses to help support their viability (against a backdrop of rising costs), our high-level forecasts indicate a nominal £2.5m net residual expenditure capacity up to 2035. The growth to sustain new cafés, restaurants and bars will be very much subject to market demand. Focusing new uses in town centres will help increase competition and consumer choice, and to underpin both daytime and evening economies.
 - In relation to **cinemas**, the existing provision comprises some 8 screens and venues in the District area show a 51.8% level of participation from the overall Study Area. However, there is no identified capacity for cinema screens.
 - Regarding other commercial leisure uses, there is currently no identified need for **gambling venues** (e.g., bingo halls and casinos). The presence of physical gambling activities such as betting shops in high streets is also a contentious issue due to the perceived social, economic and health/wellbeing impacts on individuals and households.
 - There is no commercial provision of **tenpin bowling** in the District and any future provision will be subject to market demand which should be directed to town centres.
 - In terms of **theatres** and **music venues**, the District there is a low level of market share (14.8%) with strong competition from venues across Oxford City Centre and beyond to Central London.

- **Historic** and **cultural** attractions also attain a low market share of 12.4% from across the Study Area. The principal competing venues yet again are across Oxford City Centre and beyond to Central London.

329. In relation to the market share of trips and activities focused on theatre, music, cultural and historic attractions the responses from the household indicate the centres and venues in the District are facing substantial competition from venues in Oxford City Centre and Central London and therefore are not necessarily achieving a good level of retention. This requires more place promotion especially amongst the District's resident community to market the centres and also visitors to enable the continued vitality of the centres and venues.
330. The forecast need for any new commercial leisure uses will be subject to wider economic, consumer and market trends, and will depend on the demand from leisure operators for representation. Where demand does exist, new uses and activities should be focussed across the District's main centres first, in compliance with national and local plan policy objectives to maintain and enhance their overall vitality and viability.

ACCOMMODATING RETAIL AND LEISURE NEEDS

331. The NPPF (paragraph 90d) states that planning policies should “...*allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead*”. Aligned with the NPPF, the PPG (Paragraph 004, Reference ID:2b-004-20190722) identifies that town centre strategies should establish the potential for “...*development or the redevelopment of under-utilised space*” to accommodate the scale of assessed need, and the more effective and efficient use of land (for example, the scope to group particular uses such as retail, restaurant and leisure activities into hubs, or for converting airspace above shops). In turn, this will help to establish the need for centre “expansion,” “consolidation” and/or “restructuring.”
332. It is to be recognised that the capacity forecasts do not take account of current (or future) vacant retail floorspace in the main centres and shopping locations. Some of this vacant space (particularly in prime shopping locations) will be available and suitable for re-occupation, re-purposing and/or redevelopment both now and in the future. We therefore advise that any forecast capacity and/or market demand for new retail and commercial leisure floorspace could either be accommodated in suitable vacant units, or by the mixed-use development of vacant sites/buildings (i.e., ground floor commercial uses, with residential above).
333. As the headline retail capacity forecasts have shown there is no capacity for both convenience and comparison goods and there is no requirement for the Council to allocate any new sites for retail provision to the period to 2035.

TOWN CENTRE FUTURES

334. 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" (paragraph 90). Both the NPPF and the extant plan policies support the need to maintain and enhance the long-term vitality and viability of town centres first, as the most appropriate and sustainable locations for new investment and development.

ISSUES, CHALLENGES AND OPPORTUNITIES

335. It is apparent that centres within the District (like other centres across the UK) are facing a myriad of issues and challenges to their vitality and viability from the dynamic changes in the retail and leisure sectors. The challenges have been further accelerated and compounded by the legacy impact of the pandemic and current inflationary macro-economic position, and include:
- the growth of online shopping and home-based leisure activities (from watching movies to eating at home);
 - the increase in retail failures and closures;
 - a dramatic fall in market demand for space;
 - a rise in vacancies and fall in footfall; and
 - limited forecast need or market demand for new retail floorspace.
336. In the context of the issues and challenges, although retail will remain a key part of town centres overall offer, vitality and viability - helping to generate trips, footfall and spend – it is critical that the policies and strategies developed for each centre help to promote greater flexibility and diversity, so that they can respond more effectively and rapidly to future trends. This flexibility and diversity will, in turn, help to create more resilient, attractive and successful town centres. It will also help to strengthen their respective roles in the network and hierarchy of centres as places to live, work, shop, study, play and visit for a wide range of uses and activities.
337. **The tables** below summarise some of the key opportunities and initiatives identified for the main centres in the District based on the research and evidence. In summary the key suggestions are as follows:
- **Witney Town Centre** is at the apex of the District's hierarchy for larger scale commercial, community, leisure and cultural development. The extant local plan defines it as the principal town centre of the District. The extant plan also seeks to maintain a strong and diverse shopping core promoting Market Square and Corn Street as cultural hubs. The plan also aims to enhance public spaces, boost Witney's profile as a visitor destination, and preserve its historic character. Accessibility is a priority, while restricting intensified commercial development in the Buttercross/Church Green area. Oxfordshire County Council is improving Witney's High Street and Market Square with a £1.98 million grant Active Travel Fund. The project aims to enhance public spaces, support businesses, and improve pedestrian and cyclist access. The emerging local plan consultation (Your Place, Your Plan Consultation Summary Report (February 2024)) stresses the collectively importance of revitalising town centres, maintaining or increasing core services, and supporting the viability of smaller settlements, indicating that investments and developments should aim to sustain and benefit all these locations.

Table 30: Witney Town Centre: Opportunities for Growth and Transformation

Witney Town Centre
Adaptation to changing trends by encouraging mixed-use development incorporating retail, community, and social spaces.
Support flexible retail spaces and service-based growth for diverse demographics.
Enhance Market Square with events, pop-ups, cultural activities, and seasonal markets.
Combine placemaking with improved promotion and District-wide centres marketing strategies.
Leverage the town's heritage and proximity to the Cotswolds to attract more visitors.
Promote specialist retail and leisure activities that offer unique experiences.
Position Witney within the District and beyond as a destination by showcasing its tradition, heritage, and character.
Improve and promote greening as part of a placemaking strategy.
Continue enhancing public spaces to boost investment, work, and social wellbeing.
Improve safe and accessible pedestrian and cycle routes across the town centre.
Strengthen active travel and walking connections on the back of Active Travel funding.
Promote the evening economy and work towards Purple Flag status.
Develop event spaces within the public realm to support day and evening/night time activities and tourism.

- Carterton Town Centre:** is defined as a primary town centre. The extant local plan seeks to expand and integrate a diverse range of retail, dining, leisure, and public spaces, including ancillary residential development, together with, improving the quality of the public realm with enhanced landscaping and public spaces. There has been recent public space and accessibility improvements, including a Sensory Garden and the St. John's Garden Project. At present, the centre serves its immediate residential catchment including the large military community. It has a strong convenience retail presence (Asda, Aldi, Morrisons) and a low vacancy rate (1.6%) compared to the national average (14.1%). The emerging local plan consultation outputs refers to the need for a holistic approach to development that addresses current deficiencies in infrastructure and public services, improving transport, revitalising the town centre. Furthermore it also refers to the town centre as being 'too small' for the current population, with a desire for its 'expansion and revitalisation'. In our opinion we consider the opportunities for growth will be predicated on the

developing the diversity and mix of opportunities especially in terms of commercial leisure provision. At this stage the spatial provision remains adequate and the Council should be mindful of the challenging trends in the commercial retail and leisure sector that will affect and influence spatial provision in the future.

Table 31: Carterton Town Centre: Opportunities for Growth and Transformation

Carterton Town Centre
Encourage and support the mix and diversity of town centre uses.
Encourage investment in the leisure / entertainment offer to enhance the evening economy.
Provision of facilities for the youth and intra-generational community spaces.
Provide contemporary, flexible and temporary space to attract and nurture entrepreneurs, creatives, start-ups and small businesses.
Continue improvements to the public realm and greening.
Develop a rolling programme of place promotion including fairs / festivals in the centre.
Provide for active travel, including new pedestrian and cycle routes.
Co-ordinate tourism offer with other centres within the District as part of a more coherent and compelling attraction for visitors and tourists to the District area.
Develop safe and legible pedestrian and cycle routes in to, and across the town centre.
Provide more/new electric vehicle charging (EVC) points.

- **Chipping Norton** is also defined as a primary town centre. The extant local plan calls for a stronger town centre with the need to reduce the impact of through traffic. Despite this detractor, the overall quality of the environment is generally enhanced by the historic buildings architecture and well-kept shop fronts. The centre provides a leisure / culture focus in the form of the Chipping Norton and the boutique Living Room Cinema. The centre has an above average vacancy rate (17.6% of outlets compared with the UK average of 14.1%). Future opportunities for improvements should be focussed on the public realm, greening and activation of vacant space.

Table 32: Chipping Norton Town Centre: Opportunities for Growth and Transformation

Chipping Norton Town Centre
Improve pedestrian safety and traffic calming measures.
Invest in greenery, street furniture, and public spaces.

Chipping Norton Town Centre
Activate vacant spaces / areas with events and pop-ups.
Encourage family-friendly evening activities.
Develop a cohesive place-making and promotion strategy.
Co-ordinate tourism offer with other centres within the District as part of a more coherent and compelling attraction for visitors and tourists to the District area.
Enhance pedestrian and cycling routes.
Offer modern, adaptable, and temporary spaces designed to attract and support entrepreneurs, creatives, startups, and small businesses.
Upgrade the market with higher quality and more frequent events.
Promote the historic town as a tourism destination.
Improve wayfinding signage for better navigation.
Improve pedestrian safety and further traffic calming measures.

- **Burford** is designated as a town centre with a significant tourist role. As the "Gateway to the Cotswolds", the town centre is renowned for its historical significance, architecture a designated district centre with a historic character and form. The centre's main retail and leisure provision is dissected by the A361 (High Street / The Hill) that detracts from its otherwise charm and historic character. The future opportunities for growth rely on the linkages with the District's other centres and in placemaking and 'placekeeping' (i.e. the active care and maintenance of a place and its social fabric by the people who live and work there).

Table 33: Burford Town Centre: Opportunities for Growth and Transformation

Burford Town Centre
Develop sustainable tourism initiatives that highlight the town's history and character.
Co-ordinate tourism offer with other centres within the District as part of a more coherent and compelling attraction for visitors and tourists to the District area.
Create new landmarks or celebrate existing ones.
Develop and enhance gardens and green spaces for community benefit.
Continue to curate a diverse mix of restaurants, bars, and eateries to boost the local economy.
Improve wayfinding with themed links to local assets, better lighting, and signage.

Burford Town Centre

Enhance safe and accessible pedestrian and cycle routes within and beyond the centre.

Promote active travel to improve connectivity, social value, and well-being.

- **Woodstock** is another town centre with a significant tourist role. It is renowned for its independent offer shops and the extant local plan seeks to ensure that it remains vibrant through resisting the loss of shops and other town centre uses. With a low vacancy rate the future opportunities for Woodstock is underpinned by its strong independent offer, heritage and history.

Table 34: Woodstock Town Centre: Opportunities for Growth and Transformation

Woodstock Town Centre

Develop initiatives showcasing the town's history and character.

Coordinate promotion efforts with other centres, including Blenheim Palace.

Promote events and heritage trails to celebrate local history.

Establish a rolling programme of fairs, festivals, and street markets.

Provide year-round events to attract residents and visitors.

Enhance public spaces with more greenery.

Invest in updated street furniture, public spaces, and shop frontages.

Improve wayfinding and accessibility.

Improve pedestrian and cycle networks.

Develop new routes for active travel to increase accessibility and footfall.

Implement place-based strategies to boost visitor numbers and local business support.

NETWORK AND HIERARCHY OF CENTRES

338. We have reviewed the Council's existing network and hierarchy of main centres in accordance with the advice set out in the NPPF (paragraph 90a) and PPG (References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres).
339. As noted in **Section 2**, Policy E6 on Town Centres details the hierarchy of the centres in the District. From our assessment we have not seen any new evidence

to indicate that there is any requirement to adjust the centres included within this category at the present time. Based on the study findings, we advise that the District's town centres largely function in line with their current roles in the hierarchy.

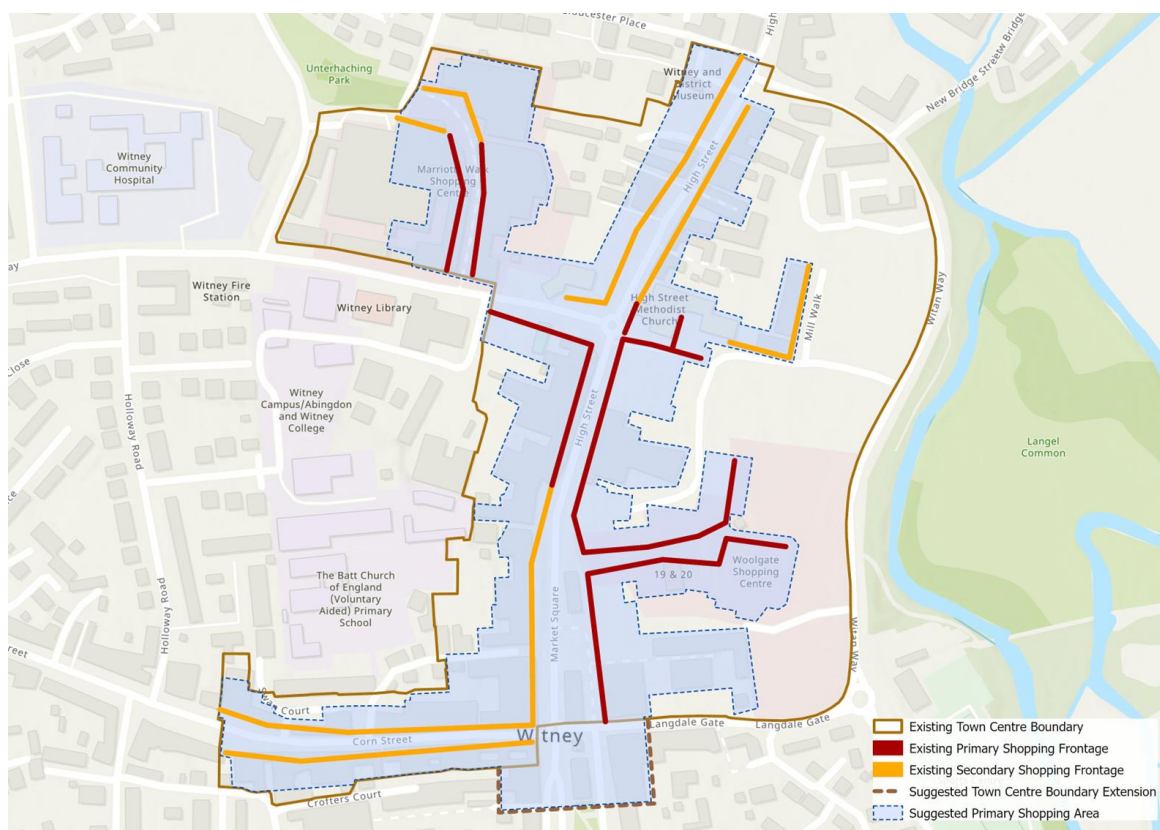
340. We also do not consider that there are any external influences that would suggest any changes in the retail hierarchy would be appropriate at this stage. There has not been any significant change in national planning policy relating to retail and town centres nor any major change in any of the centres that would justify a change.

TOWN CENTRE BOUNDARIES AND PRIMARY SHOPPING AREA DEFINITIONS

341. The NPPF states that planning policies should “...define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre” (paragraph 90b). Furthermore, Annex 2 to the NPPF:
- defines the **Primary Shopping Area (PSA)** as an “...area where retail development is concentrated;”
 - defines **Edge of centre** (for retail purposes) as a location that is “...well connected to, and up to 300 metres from, the primary shopping area” (our emphasis underlined); and
 - for all other main town centre uses edge of centre is a location “...within 300 metres of a town centre boundary” (our emphasis underlined).
342. The NPPF explains that the **town centre** is an area defined on the local authority's policies map, and includes the PSA and areas predominantly occupied by main town centre uses within or adjacent to the PSA.
343. There is no policy requirement under the NPPF to define primary and/or secondary shopping frontages. The revised NPPF (December 2024) has removed the requirement for local authorities to identify shopping frontages.
344. Given the scrapping of the previous Class A uses (including shops) and the introduction of a much wider Class E use (which incorporates Class A1-A3, B1, D1(a), D1(b) and D2(e)), the definition of a PSA (i.e., an area where retail development is concentrated) is more problematic.
345. The policies pertaining to plan-making and decision taking for retail, leisure and town centre uses in the NPPF do still refer to the need to define a PSA. The definition of a PSA is critical, for example, to the application of both the sequential and impact tests (paragraphs 91-95). As a result, we have necessarily reviewed the current PSA boundaries, and where necessary redefined these boundaries so that they are aligned with the current NPPF.
346. Drawing on the evidence and key findings of this study, the following sets out our judgements and advice on the definition of appropriate and robust PSAs for the District's centres.

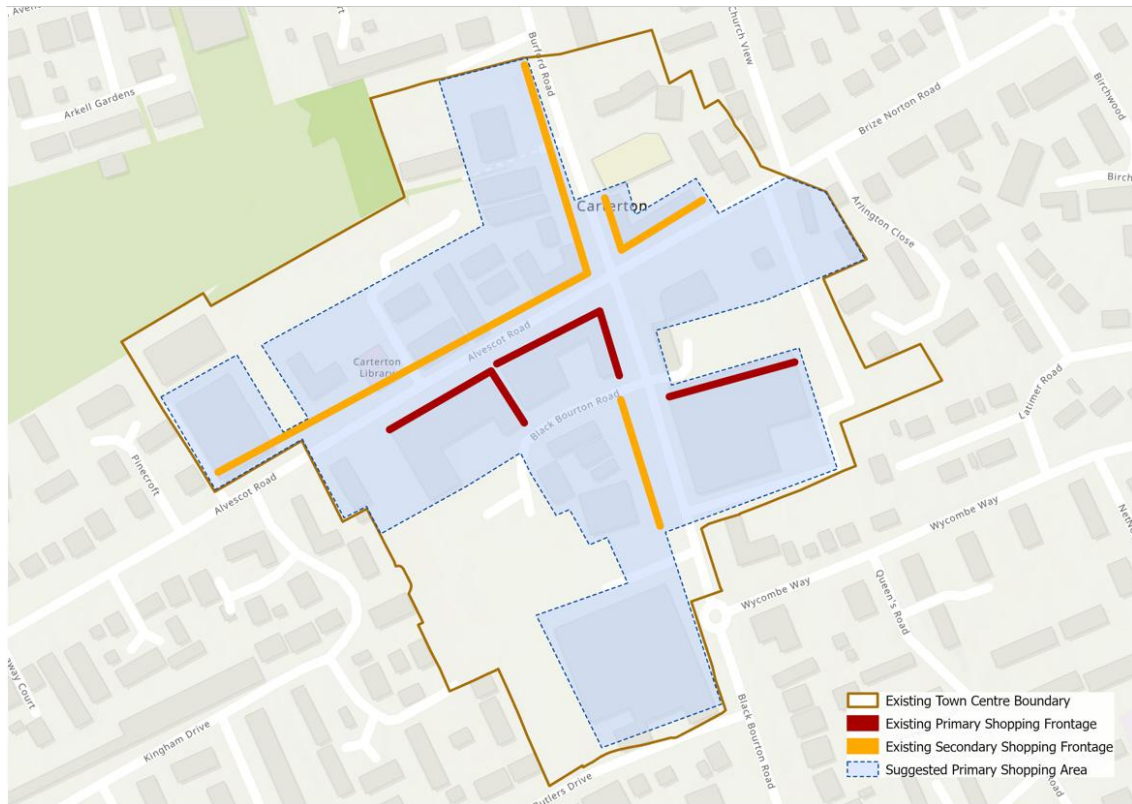
- **Principal Town Centre: Witney:** We propose a change to the town centre boundary to the south to incorporate the retail and leisure provision along Church Gardens and Market Square. Furthermore we have also defined a PSA in line with the concentration of retail uses across the centre as shown in the map below.

Figure 18: Witney: Existing Town Centre Boundary & Suggested Extension and PSA



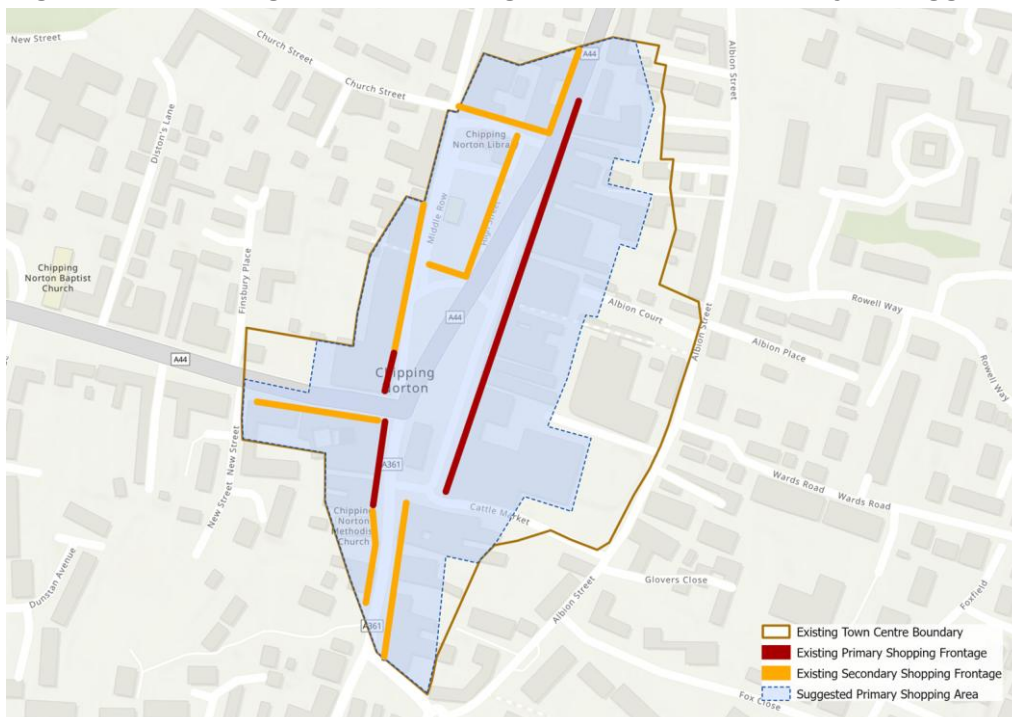
- **Primary Town Centre: Carterton:** No proposed change to the town centre boundary. A suggested PSA is provided which is based on the concentration of retail uses as per the NPPF.

Figure 19: Carterton: Existing Town Centre Boundary & Suggested PSA



- **Primary Town Centre: Chipping Norton:** No proposed change to the town centre boundary. A suggested PSA is provided which is based on the concentration of retail uses as per the NPPF.

Figure 20: Chipping Norton: Existing Town Centre Boundary & Suggested PSA



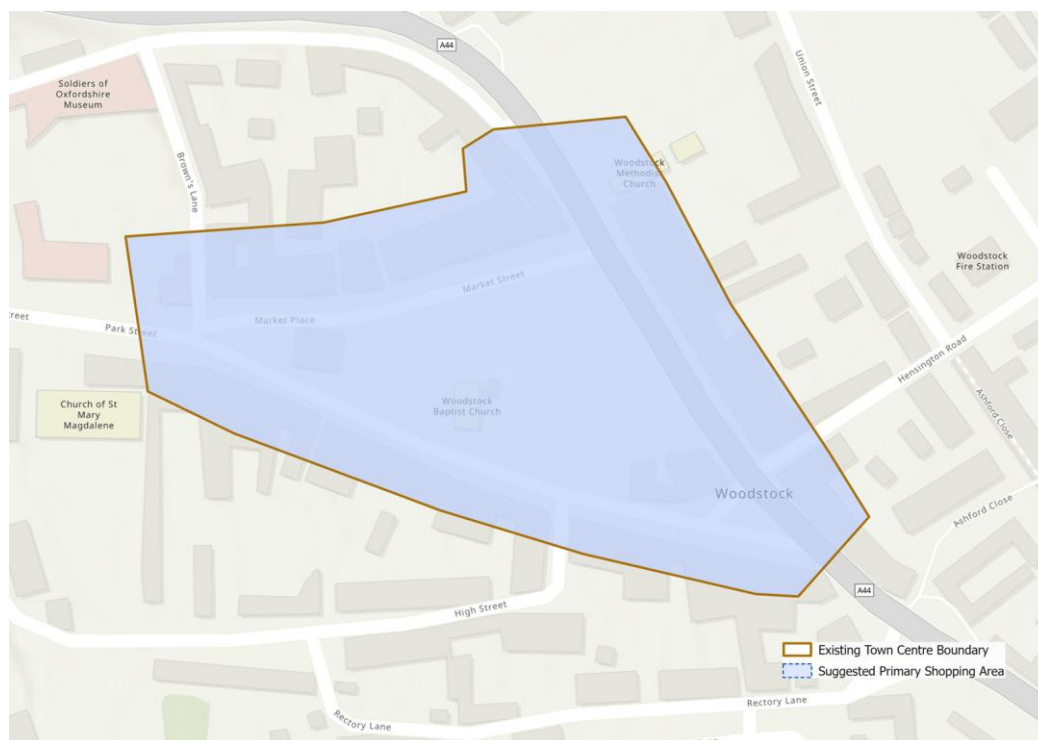
- **Town Centre: Burford:** No proposed change to the town centre boundary which also broadly covers the provision of retail uses. On this basis the suggested PSA effectively covers the town centre boundary area.

Figure 21: Burford: Existing Town Centre Boundary & Suggested PSA



- **Town Centre: Woodstock:** No proposed change to the town centre boundary which also broadly covers the provision of retail uses. On this basis the suggested PSA effectively covers the town centre boundary area.

Figure 24: Burford: Existing Town Centre Boundary & Suggested PSA



LOCAL FLOORSPACE IMPACT THRESHOLD

347. The NPPF requires an impact assessment to be undertaken for “*retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan*” (paragraph 94). Local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, but if there is no local threshold, then the NPPF default threshold (2,500 sqm gross) should be applied. To help inform the setting of an appropriate impact threshold, the PPG (Paragraph: 015. Reference ID: 2b-015-20190722) also states that it will be important to consider the following:
- scale of proposals relative to town centres;
 - the existing viability and vitality of town centres;
 - cumulative effects of recent developments;
 - whether local town centres are vulnerable;
 - likely effects of development on any town centre strategy; and
 - impact on any other planned investment.
348. Under the **extant Local Plan Policy E6 on Town Centres** there is a defined local impact threshold of **500sqm net** at present for significant proposals where they are not in a centre or in accordance with a local or neighbourhood development plan.
349. We advise an impact threshold of **280 sqm gross** is most appropriate and robust for assessing the impacts of any proposed retail/leisure developments outside of defined centres in accordance with paragraph 94 of the NPPF. The justification

and evidence to support this lower impact threshold is set out in the paragraphs below.

350. As reported in **Section 3**, the growth in internet shopping is having a significant impact on the way households choose to buy food and non-food goods, which in turn is impacting upon retailer business and operating models. This should be considered alongside the long-term impacts of out-of-centre stores, shopping and leisure facilities on town centres. These impacts are probably best illustrated by the changes in the grocery sector over the last decade. Following a sustained period of growth over almost 20 years up to 2010, principally driven by new larger format superstore openings, the main grocery operators (i.e. Tesco, Sainsbury's, Asda, Waitrose and Morrisons) have effectively scrapped their superstore expansion programmes to focus on growing their market shares via online sales and opening smaller convenience stores (i.e. Sainsbury's Local, Tesco Express, Little Waitrose, etc.). Although sizes vary from location-to-location, the main grocers are promoting smaller convenience stores with a minimum gross floorspace of between 280 sqm and 372 sqm (circa 3,000 - 4,000 sq ft).
351. The 280 sqm gross floorspace figure is also significant, as stores below this threshold are exempt from Sunday trading restrictions. In brief, the Sunday Trading Act defines a 'large shop' as generally being over 280 sqm gross. It is the Government's intention through this Act to protect smaller, independent stores which are perceived to be financially weaker and therefore require protection from unfair competition from the major supermarket operators. In general terms therefore it follows that proposals for retail floorspace over 280 sqm gross are unlikely to be a purely local facility and will have the ability to draw trade from outside of their immediate local catchment with potential consequent impacts on existing stores and centres. For example, in circumstances where convenience stores are proposed on the edge or outside of centres, often as part of petrol filling stations or conversions of public houses, they can have a significant adverse impact on the trading performance, vitality and viability of smaller district and local centres nearby. This will particularly be the case where these existing centres are dependent on smaller supermarkets and/or convenience stores to anchor their retail offer, and to generate footfall and linked trips/expenditure to the benefit of other shops, services and facilities. In some cases, post office counters can also form an integral part of the convenience store offer and attraction in smaller centres, and their future operation could therefore also be jeopardised by new convenience stores opening outside of centres.
352. The Government's overarching aim to protect the role, function and integrity of local shops selling essential goods and comprising essential services (e.g. post-office counters) is further demonstrated by the reforms to the UCO and the introduction of the new Class F2, which covers local community uses. Within this category, Class F2(a) specifically pertains to a shop (previously classified as A1) selling mostly "essential goods", including food, to visiting members of the public where the shop's premises cover an area of no more than 280 sqm and there is *"no such facility within 1,000 metre radius of the shop's location"*. This new use class is intended to ensure that uses which are important to local communities

have some protection through the planning system, because the scope to change use without planning permission is more limited.

353. At the same time, the market demand from operators seeking representation and space in town centres is falling significantly as the space available in centres is often of the wrong size and configuration, and in the wrong location to meet today's retailer requirements. For example, modern multiple retailers selling a range of comparison goods (including, for example, fashion, home store and 'bulky' goods) generally have requirements for larger format modern premises with a minimum size of circa 465 sqm gross (5,000 sqft), and usually 929 sqm (10,000 sqft) and above. This minimum floorspace provides operators with the necessary 'critical mass' of sales needed to display their full range of goods in-store and attract customers from a wider catchment area, particularly where they are co-located alongside similar stores in town centre and out-of-centre locations. These minimum floorspace requirements also fall significantly below the NPPF-default threshold of 2,500 sqm gross.
354. The health checks for the town centres have also identified that smaller independent stores and services make a significant and vital contribution to each centre's diverse offer, attraction and viability. The table below shows the average size of comparison and convenience units in each main centre as sourced from Experian Goad data.

Table 35: Average Size of Outlets by Centre & Category (sqm gross)

Centre	Comparison Retail			Convenience Retail			Total of Retail, Leisure & Services		
	Total Floorspace (sqm)	Total Outlets	Average Outlet Size (sqm)	Total Floorspace (sqm)	Total Outlets	Average Outlet Size (sqm)	Total Floorspace (sqm)	Total Outlets	Average Outlet Size (sqm)
Witney	17,600	91	193	5,970	19	314	16,100	99	163
Carterton	2,670	9	297	7,620	8	953	5,670	39	145
Chipping Norton	4,530	34	133	2,310	9	257	5,940	38	156
Burford	4,690	39	120	920	7	131	2,420	15	161
Woodstock	2,460	28	88	560	5	112	5,290	32	165
Totals /Average	31,950	201	159	17,380	48	362	35,420	223	159

355. As the table shows the average size of comparison goods units range from 88 sqm to 297 sqm, with an overall average unit size of 159 sqm. For convenience goods the average unit size is higher at 362 sqm; ranging from 112 sqm for Woodstock, to 953 sqm for Carterton. This is explained by the fact that the convenience offer in the larger centres of centres of Witney, Carterton, Chipping Norton is generally anchored by at least one larger format foodstore (and in the case of Carterton some three foodstores). If these anchor foodstores are excluded, then the average unit size for the centres will fall significantly. Furthermore, the average unit size for all retail, leisure and service businesses in the District's main town centres is 159 sqm gross.
356. Turning to the published and known market demand from retailers and leisure operators for representation in the areas main centres, it is apparent that the minimum average unit sizes operators are seeking are significantly below the

NPPF threshold of 2,500 sqm gross (see **Volume 2**). For example, in Witney the average unit size requirement for the five comparison retailers ranges from 488 sqm gross, up to 1,666 sqm gross. For Chipping Norton 140 sqm gross to 230 sqm gross; Woodstock 110 sqm to 370 sqm gross. Clearly if the demand from these operators was for edge and/or out of centre locations, then it could undermine the future retail offer and investment within the Council's centres. In turn this could result in a significant adverse impact on their vitality and viability, specifically in terms of reduced market demand, investment and trade.

357. We have also had regard to the District-wide capacity assessment for new retail (convenience and comparison goods) floorspace, focussing on the next five to ten years in accordance with the advice set out in the NPPF and PPG, but also taking the lifetime of the plan into account. In this case the capacity forecasts show no capacity for new retail floorspace over the ten-year period, or over the lifetime of the plan to 2041 (after allowing for all known commitments). Where potential floorspace capacity exists it will support new commercial floorspace in the District's centres or planned as part of housing allocations. It is critical that the investment in and delivery of this new floorspace is not harmed by proposals for new floorspace of varying scale and use outside these areas and existing centres.
358. In conclusion, we consider that the above evidence provides robust support and justification for the setting of a lower floorspace threshold of 280 sqm gross. This will provide the Council with greater flexibility to robustly assess the individual ('solus') and cumulative impacts of any smaller commercial floorspace (including convenience stores) proposed outside of existing centres that could compete 'like-against-like' with existing, planned and proposed investment in its main centres. We also advise that this threshold should be applied, where relevant, to change of use applications and applications seeking variations of conditions. It should be noted that whilst the proposed threshold applies to net additional floorspace, where a proposal is for the redevelopment of existing retail floorspace, the threshold should apply to the total floor area proposed (i.e. existing and net additional).
359. By way of additional clarification, the Council will be aware that the locally set impact threshold does not determine whether an application should be allowed or refused, only whether an application should be subject to an impact assessment. Furthermore, the PPG advocates that the level of information pertaining to the impact test (and the sequential test) provided in support of any application should be proportionate and considered in a locally appropriate way. We therefore advise the Council that they should pro-actively engage with any applicant at an early state in the pre-application process to scope and agree the detail of any assessment and the evidence required in support of an application on a case-by-case basis.

10. GLOSSARY OF TERMS

Term	Definition
Town Centres	Town are the principal centre or centres in a local authority's area. When planning the future of town centres, local planning authorities should consider the function of various parts of the centre and how these contribute to its overall vitality and viability.
District Centres	District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. These centres generally contain between 10,000-50,000sqm of retail, leisure and service floorspace; and provide a higher proportion of convenience over comparison goods.
Local Centres	Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office, a pharmacy or a launderette.
Town Centre Uses	As defined in the NPPF, main town centre uses are retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, cultural and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Neighbourhood Centres	Normally comprise all parades of shops that are of purely local significance.
Town Centre Boundary	Defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. The extent of the town centre should be defined in Local Plans and on the policies map.
Primary Shopping Area	Defined area where retail development is concentrated.

Term	Definition
Edge-of-Centre	As defined in the NPPF, for retail purposes a location that is well connected up to 300 metres from the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances.
Out-of-Centre	A location which is not in or on the edge of a town centre. Out-of-centre locations are at the bottom of the retail hierarchy and any application for retail development in an out-of-centre location must fully assess impacts and rule out potential for locating in a more sequentially preferable location.
Convenience Retailing	Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.
Comparison Retailing	Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
Supermarkets	Stores selling mainly food, with a trading floorspace less than 2,500 square metres, often with car parking.
Superstores	Stores selling mainly food, or food and non-food goods, usually with more than 2,500 square metres trading floorspace, with supporting car parking.
Retail Warehouses	Large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for car-borne customers.
Retail Parks	An agglomeration of at least 3 retail warehouses.
Warehouse Clubs	Large businesses specialising in volume sales of reduced priced goods. The operator may limit access to businesses, organisations or classes of individual.
Factory Outlet Centres	Groups of shops specialising in selling seconds and end-of-line goods at discounted prices.

Term	Definition
Leisure Parks	Leisure parks often feature a mix of leisure facilities, such as a multi-screen cinema, indoor bowling centres, night club, restaurants, bars and fast-food outlets, with car parking.
Convenience Goods Expenditure	Expenditure (including VAT as applicable) on goods in COICOP (Classification of individual consumption by purpose categories): Food and non-alcoholic beverages, Tobacco, Alcoholic beverages (off-trade), Newspapers and periodicals, Non-durable household goods.
Comparison Goods Expenditure	Expenditure (including VAT as applicable) on goods in COICOP Categories: Clothing materials & garments, Shoes & other footwear, Materials for maintenance & repair of dwellings, Furniture & furnishings; carpets & other floor coverings, Household textiles, Major household appliances, whether electric or not, Small electric household appliances, Tools & miscellaneous accessories, Glassware, tableware & household utensils, Medical goods & other pharmaceutical products, Therapeutic appliances & equipment, Bicycles, Recording media, Games, toys & hobbies; sport & camping equipment; musical instruments, Gardens, plants & flowers, Pets & related products, Books & stationery, Audio-visual, photographic and information processing equipment, Appliances for personal care, Jewellery, watches & clocks, Other personal effects.
Special Forms of Trading	All retail sales not in shops and stores; including sales via the internet, mail order, TV shopping, party plan, vending machines, door-to-door and temporary open market stalls.
Gross Ground Floor Footprint Floorspace	The area shown on the Ordnance Survey map or other plans as being occupied by buildings and covered areas measured externally.
Gross Retail Floorspace	The total built floor area measured externally which is occupied exclusively by a retailer or retailers; excluding open areas used for the storage, display or sale of goods.
Net Retail Sales Area	The sales area within a building (i.e., all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts.

Term	Definition
Retail Sales Density	Convenience goods, comparison goods or all goods retail sales (stated as including or excluding VAT) for a specified year on the price basis indicated, divided by the net retail sales area generating those sales.
Quantitative Need	Is conventionally measured as expenditure capacity (i.e., the balance between the turnover capacity of existing facilities and available expenditure in any given area). Expenditure capacity, or 'quantitative need' can arise as a result of forecast expenditure growth (either through population growth or increase in spending), or by identification of an imbalance between the existing facilities and current level of expenditure available in an area.
Qualitative Need	Includes more subjective measures such as, for example, consumer choice; the appropriate distribution of facilities; and the needs of those living in deprived areas. 'Over trading' is also identified as a measure of qualitative need, although evidence of significant over-crowding, etc., may also be an indicator of quantitative need.