Dear Sirs

Thank you for the consultation on the proposed Oxpens Masterplan SPD.

As the Oxford canal does not run near the site the Canal & River Trust have no comments to make.

Best regards
Oxfordshire Unlimited

Posted At: 18 June 2013 09:04
Posted To: planningpolicy@oxford.gov.uk
Subject: Oxpens Masterplan

Ref: Oxpens Masterplan

Oxfordshire Unlimited represents people living with physical and sensory disabilities and our role is to encourage their equality and inclusion in all aspects of community life. We are interested in the Oxpens development and are encouraging members, over 200 of whom have disabilities, to take part in your consultation.

We hold coffee mornings in Peace House, Paradise Street from 10.30 to 1.00 every month and we’ll be there this Thursday 20th June. We would like to invite someone from the project team to join us for a coffee to discuss the Oxpens plans with us so that we can pass on to our members your intentions to accommodate the requirements of disabled people in your project. You might also like to discuss how we might be involved more directly, from planning to prototyping a pool of willing disabled people may be useful to you.

Some of our management committee, all of whom are either disabled themselves or are carers for someone who is, will be present on Thursday and will encourage a vigorous conversation on the subject.

We look forward to meeting one of you then

With kindest regards
While it is encouraging to see the emphasis given to sustainability in the master plan, it is perhaps surprising that there is no reference to objectively assessed measures of sustainability such as the Code for Sustainable Homes or BREEAM. The majority of local planning authorities in the country now apply such standards through planning policy and development management. Using such nationally recognised standards ensures that externally verifiable levels of sustainability are being achieved for new buildings.

In addition, both developers and local planning authorities are increasingly using BREEAM Communities for the masterplanning of larger developments. Bristol City Council, for example, have it as a policy requirement in their adopted core strategy.

Setting such standards would provide a valuable framework which would ensure a consistent level of sustainability is maintained across the variety of types of development and over the significant period of time over which such a large site is likely to be developed by a number of different developers.
The Oxfordshire Green Party has the following comments to make on the Masterplan:—

### Housing and Other Allocated Uses

Given Oxford’s housing problems we consider this brownfield site is an enormous opportunity to provide much needed housing, especially affordable housing, and we applaud the decision for 50% to be affordable housing.

However we feel that far too much land has been allocated for business, university and other uses. The reason behind this seems to be to achieve high development returns. We are not convinced there is a reasonable argument for this on the residual railway land. One of our members, as a city planning officer nearly forty years ago, had a series of meetings to discuss the way forward to develop this land and despite this and further on-going initiatives, plans and discussions this land, and land adjoining it, has largely remained in a state involving very little economic return. Why now is there pressure for the highest returns at the expense of Oxford’s overwhelming need for more housing?

We would also question why so much land needs to be allocated for student housing. Research and our submissions we made for the Sites and Housing DPD by us indicated that already far too much land had been allocated for student housing throughout the city at the expense of ordinary and affordable housing and in excess of that required in core planning policies.

We understand that building adjacent to the railway line has problems but the Masterplan explicitly states

> “The site for student accommodation has sufficient space to accommodate residential apartment buildings set in landscaped gardens that can insulate the remainder of the site from the railway line”

If this is true we feel ordinary housing could be acceptable.

### Flooding and Oxpen’s Field

We are concerned that a detailed Masterplan involving a specified number of housing units, building heights and allocations for a variety of business and other uses can be embarked upon before there has been serious and definitive work done on the flooding implications. To do so will give a significant presumption in favour of this form and amount of development to the detriment of the full consideration of the implication and choices surrounding flooding precautions and remediation.

We read with concern in the Strategic Environment Assessment the following:—

> “The technical work undertaken to support the SPD found that there are sufficient uncertainties associated with the current representation of flooding at Oxpen to cast doubt on the EA’s Flood Map. This means that the impact of development upon water levels and flood risk is not fully understood. As such the likelihood or geographical scale of the effect, its significance, permanence or reversibility could not be predicted or evaluated. The technical work concluded that the existing understanding of flood water and flood risk in the vicinity of the Oxpen’s site is rather rudimentary and on that basis, to either rule out the sketch Masterplan or definitely say that it is technically feasible would be wholly unsubstantiated”.
We consider the scale and extent of development can only be worked up with a complete study of the flooding implications for two vital reasons. Firstly immediately across the bank and downstream is South Oxford a heavily populated part of Oxford at significant flood risk. The effect of the proposals on this area must be fully understood before a definitive masterplan is drawn up which will act strongly as a presumption in favour of the amount and distribution of development

Secondly the implications of flood remediation and compensation on the ecological, aesthetic character of existing landscape of the riverside and its trees and vegetation needs to be given as much attention in any plan as the plan gives to the form of the built environment. It is not at all clear from the plan how flood mitigation will affect this fragile and sensitive riverine area through flood mitigation work, reshaping and re-levelling.

**Views into the Site: View Cones.**

We are very concerned about so little information or attention given in this plan into views into the site and have read the following paragraphs.

"The prominence of this site in views of the City Centre from the western hills, and in the City Council’s protected view cones in particular has been be explored by Oxford City Council officers, including the Heritage Officer.

Site visits have informed the Officers conclusion that the three most important view points from which development at Oxpens will be visible are Port Meadow, Raleigh Park, and Boars Hill. These are official view cone points and will be used by Officers in determining the impact of new development at the Oxpens site on the spires and historic landscape.

Another important location for views is Hinksey Golf Course. Although this is not an official view cone location members of the golf course may view Oxford from this location”.

Following the City Council’s debacle over Roger Dudman Way we are extremely dubious about what is meant by “explorations by the City Heritage officer”. The document itself shows this major eyesore in the view from Port Meadow. It serves to illustrate the awful effect this planning decision by the City Council has had on heritage, landscape and townscape, and the lack of proper exploration of heritage implications by the Council.

It is clear that the development of the site and of the Westgate development could have enormous impact on the views from Rayleigh Park, Boars Hill and Hinksey Heights. The wooded setting needs to remain dominant and the views are already partly compromised by existing re-development and an abundance of cranes. We would question whether a development up to five storeys would be too intrusive.

Views to out of the City from Saint Georges Tower and the Castle Mound are likely to be compromised by the proposed height and form as well.

The views do not show any visual representation of the effects of such heights on the city townscape and landscape which in our view is essential to the preparation of a sound Masterplan. Until this is done accurately and transparently we do not think it right to confirm a Masterplan detailing building heights and possible block sizes which could also be intrusive viewed from both inside and outside the City.

**Contamination**

The scope for contamination on a former Railway Yard is significant and we do not think it appropriate to leave assessment of it to a later stage.
Vale of White Horse District Council

Posted At: 23 July 2013 17:41
Posted To: planningpolicy@oxford.gov.uk
Subject: Response to Draft Oxpens Master Plan SPD

Dear sir/madam

Please find below the response of the Vale of White Horse District Council to the consultation of the Draft Oxpens master Plan SPD which ends on 29th July 2013.

Please acknowledge receipt of this response.

Comment:

“There is a need for a flexible approach that does not unduly compromise timely delivery of homes to meet local needs within the City. The Vale of White Horse District Council would encourage a flexible approach to implementing the City’s adopted policy on affordable housing in the OXPENS Master Plan SPD. We would encourage Oxford City Council to maximise the housing element on this site as the overall sustainability should be considered in its wider Oxford City context”.

Thank you for the opportunity to comment on the above.

I have reviewed the documents and am a little disappointed that there appears to be no specific mention, or addressing of community safety or the prevention of crime and disorder and anti social behaviour (ASB). I feel this should form part of the Vision Statement for the development (page 42).

This would assist the Oxpens Masterplan SPD and subsequent development in meeting the requirements of:

The National Planning Policy Framework 2012 (Part 7, Sect 58; ‘Requiring good Design’ and Part 8, Sect 69; Promoting Healthy Communities’) where it is stated that development should create ‘Safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion’.


Oxford City Council Policy CS19 ‘Community Safety’ where it states ‘New developments are expected to promote safe and attractive environments, which reduce the opportunity for crime and the fear of crime. Planning permission will only be granted for development that meets the principles of Secured by Design.’

In addition, it would assist the authority in complying with its obligations under Section 17 of the Crime and Disorder Act 1998 in doing all it reasonably can in each of its functions to prevent crime and disorder in its area.

The Design Principles for the Masterplan do contain references to crime prevention design principles such as the need to provide active frontages, overlooking of the street, private space for residents and buildings that turn the corner etc. and I do appreciate these inclusions. However, there is no specific instruction for prospective developers to create a safe environment by design and I would recommend that this is included in the final draft of the document.

Ideally, the SPD should reference the Association of Chief Police Officers (ACPO) crime prevention design initiative, Secured by Design (SBD), specifying that all development should achieve SBD accreditation. SBD has a proven track record in assisting with the creation of safer places by providing guidance on Crime Prevention Through Environmental Design (CPTED). The scheme has two levels of accreditation; an SBD Award, which is achieved by whole developments that demonstrate conformity to design principles and security standards across the entire site and; Part Two compliance, which is achieved when the physical features (windows, doors, locks etc) of the structures themselves meet specified, Police preferred standards. Although achievement of an award can sometimes be more of a challenge due to other planning considerations and/or site constraints, achievement of Part Two compliance is simply a matter of supplying and fitting the required features to accepted and tested specifications. Therefore, a level of accreditation can be achieved by all development. Details can be found at www.securedbydesign.com and further advice can be obtained by contacting Thames Valley Police’s Crime Prevention Design Team.

In addition, I am concerned about some specific aspects of the Masterplan described in chapter 6;
Page 93 addresses parking and states that some parking courts will be allowed but that they; ‘Should be small in scale with secure access’. Despite this, the indicative Masterplan shows what I consider to be quite large parking courts with only one shown gated. These features are problematic in crime prevention design terms. They make vehicles, properties and people vulnerable and can detract from the creation of active streets, which in turn has an impact on natural surveillance and community cohesion. If they absolutely must be included as an option I recommend that the wording above be strengthened to say that they ‘MUST’ be small (preferably no more that 8-10 vehicles) and secure.

Page 95 deals with cycle parking provision and again I am surprised that there is no mention of facilities for private cycle parking needing to be secure. I therefore recommend that requiring SBD standards in relation to private cycle parking is included in this section.

Page 99 addresses sustainability yet there is no mention of creating a community or community cohesion, both of which will have a direct impact on the sustainability of any development. Communities cannot be created or sustained without addressing crime, disorder and ASB and failure to do has an impact on the environment; the carbon cost of reported crime in the UK is currently estimated at more than 12 million tonnes of Co2 per annum. With all this mind, I recommend that community safety and cohesion and the importance of crime prevention design in their creation and sustainability is included in the document also.

I am of course available to discuss all of the above and assist wherever I can. Please do not hesitate to contact me in this respect or if you have any other queries regarding crime prevention through environmental design. In the meantime, I hope you find my comments of assistance in preparing the final draft of the SPD.

Regards
SENDRA

Posted At: 29 July 2013 13:55
Posted To: planningpolicy@oxford.gov.uk
Subject: SENDRA Comments Submission for the Oxpens SPD & SEA

Turn to next page
For the attention of the Planning Policy Department, Oxford City Council

Comments of SENDRA in respect of the Consultation on Oxpens Supplementary Planning Document (SPD) and the Associated Strategic Environmental Assessment (SEA)

1. Our Association, SENDRA, represents the residents of an area of the city which is a direct neighbour of the proposed development. The draft Oxpens SPD has been examined and discussed by our members, including at a very well attended Draft Oxpens SPD SENDRA meeting, and by our Committee and Planning Group. Our comments on the Draft Oxpens SPD are also informed by our involvement in the on-going consultations on the Westgate Centre Redevelopment and associated city centre transport proposals and the Railway Station Redevelopment Master Plan preparation. We were invited to make comments on the 1st Draft Oxpens SPD in February of this year and reference is also made to our earlier comments and the responses received from the City Council. We have also had discussions with our fellow association, the Oxford Civic Society. Our comments are set out in the following paragraphs.

1. General

2. We very much support the redevelopment of the Oxpens as an essential component of the regeneration of the West End Area of Oxford. We share the view that the Oxpens site represents one of the most significant development opportunities in Oxford city centre and has the potential to make a valuable contribution to the life and economy of the local area and Oxford as a whole.

3. We agree that the site, between Oxford Railway Station, the Westgate Centre and the River Thames, provides an opportunity to deliver much-needed housing and local amenities. We are also aware that the Oxford City Council has an adopted Core Strategy and West End Area Action Plan which outline the policies for development on the Oxpens site along with other key West End development sites, such as Oxford Station, Frideswide Square and the Westgate Centre. Our comments address the way in which proposals for the Oxpens and these other key West End development sites interpret these policies and interact with each other.
4. In particular please note especially Paragraph 13 and Paragraph 23 which present recommendations which we consider to be high priority.

2. Coordinated and Synchronized West End Area Regeneration

5. The West End Area Action Plan (WEAAP) states: “…….. Oxford’s West End does not match Oxford’s worldwide reputation, or live up to its potential as an urban quarter of the highest quality. There is an opportunity for radical improvement to the environmental quality of the West End, to create a sense of place, the type of place that people enjoy living in, working in and visiting. The intention is to create an area with a vibrant mix of new homes, retail and employment uses, community facilities and cultural attractions that meet the needs of Oxford’s residents and visitors. It is also recognized that there is an opportunity to improve access and movement and to create a good network of routes and connections that allow safe and efficient movement for all modes of travel”.

6. We like the vision of this WEAAP statement and consider that many aspects of the Draft Oxpens SPD reflect this. But we are very concerned that current preparation of proposals for the Oxpens site, the Oxford Station redevelopment and the Westgate Centre redevelopment do not seem to be integrated in pursuit of the vision.

2.1. Transportation Strategy for the West End Area / City Centre

7. Each of the three West End key sites which we discuss in this submission has major transportation implications. The Oxpens site will generate transport demand and will supply important routes to and from the redeveloped Oxford Station including to and from the redeveloped Westgate Centre. The Master Plan for the Oxford Station redevelopment may include consideration of the relocation of the station or some station uses to the Becket Street car park, adjoining the Oxpens site, or further south into the Oxpens site. The anticipated increased rail routes and services available through the redeveloped Oxford station will increase demand for transportation to and from the station, further emphasizing the need for a transportation hub, supporting all modes of transport. The Westgate Centre redevelopment will increase demand for transportation in the West End area.

8. To be frank we are very surprised that currently, while being asked to comment on the development of all three major West End sites there is very little information available about the characteristics of demand for transportation services. There are currently no estimates available of the numbers of rail users and where they will be travelling to on arrival in Oxford, or from, when they travel to the station and what mode of transport will be used. It is currently the same for the Westgate Centre – there is no estimate available of numbers of Westgate users needed to make the Westgate redevelopment viable, where they will come from and how they will travel. The demand for transportation services required for the

---

1 We have examined the Terms of Reference for the Station Redevelopment Master Plan and note unhelpful inconsistency in the requirements to consider a relocation site in Oxpens: is a move to Oxpens ruled out (final Paragraph of Section 3) or ruled in (Section 4 page 8 Paragraph 2)? We also note that the Draft Oxpens SPD cursorily states that relocation of the Station to Oxpens is inappropriate, but no explanation is given of why this is so and when and by whom this decision was made.

2 We understand that the travel characteristics of existing Westgate shoppers and the catchment area of the Westgate redevelopment have been studied but findings have not been available to us. We understand that this traffic generation information will be available in the Transport and Access Report which will accompany the Outline Planning Application (Currently scheduled for September 2013) but without this information it is not possible to adequately comment on the transportation aspects of the Draft Oxpens SPD.
developed Oxpens site is easier to calculate based on the Draft Oxpens SPD using its assumptions on residential and commercial supply but what is not known is how the proposed Oxpens road system will be affected by the final decision on the location of the station, the characteristics of station generated transport demand, and the characteristics of Westgate Centre generated transport demand.

9. One particular implication of this concerns Oxpens Road. A core design concept of the Draft Oxpens SPD is the transformation of Oxpens Road into a tree-lined boulevard, with limited traffic speeds and free pedestrian movements across it from the existing and new developments to the south and west. The objective is a re-connection of communities, which we strongly support. But this core design concept, which we like very much, appears to have been prepared without information being available about future uses of Oxpens Road linked to the station and Westgate redevelopments. Clearly the implications need to be fully understood before the Draft Oxpens SPD can be approved. The Oxpens Road treatment is a core design concept and if it is not feasible, the Draft Oxpens SPD would need to be reconsidered as a whole.

10. The Strategic Environmental Assessment (SEA) notes that transport modelling work has been carried out and this work looked at a number of options for a junction accessing the Oxpens development from Oxpens Road, as well as ensuring that the roads within the development were sufficient to carry the type of vehicles expected. This implies that it was the internal transportation arrangements which were modelled, but what is needed is modelling of the West End area taking into account the implications of the key West End area sites discussed here.

11. The key development sites in the West End area could also be seen in the context of other imminent major investments in transport infrastructure involving rail services, roads and cycling facilities in and around Oxford which will have a strategic effect on issues such as travel behaviour, travel modes and connectivity of journeys. The proposals presented in this consultation show no evidence of consideration of interactions with other key West End area developments or these strategic effects.

12. We have many other detailed comments on the proposed transportation arrangements but without more strategic information being made available it is premature to go into detail.

13. We highly recommend that a transport strategy for central Oxford is made available for proper consultation and is carried out before any decisions are taken on any of the current consultation sites. The geographical scope of the transport strategy will need to be wider than that provided in the exhibition of the Westgate Alliance consultation and indeed consideration needs to be given to the city wide implications of the development of these key West End area developments.

Westgate Centre Redevelopment

---

3 We were advised earlier in the year that the Draft Oxpens SPD would only go to public consultation after availability of the Draft Station Redevelopment Master Plan. The Draft Station Redevelopment Master Plan is not yet available as far as we are aware, although reference was made to it by the Westgate Alliance in a recent meeting. In the meantime there is a consultation on the Draft Station Redevelopment Master Plan, but in the absence of any draft Station Redevelopment proposals there is really not much to discuss.
14. We have attended the exhibition of this redevelopment and have met representatives of the Westgate Alliance to discuss their proposals. We have a number of concerns about the emerging design of the Westgate Centre redevelopment, which have an impact on the Draft Oxpens SPD. We have mentioned above that the Draft Oxpens SPD proposes the transformation of Oxpens Road into a tree-lined boulevard with limited traffic speeds and free pedestrian movements across it from the existing and new developments to the south and west and that this excellent proposal needs to be justified in terms of the amount and types of uses Oxpens Road will need to accommodate.

15. We are concerned that the Westgate redevelopment proposals suggest a character for Thames Street which is not consistent with the character proposed for Oxpens Road in the Draft Oxpens SPD. Oxpens Road becomes Thames Street roughly opposite the proposed site of the John Lewis Store and more or less opposite the entrance to the Oxpens Meadow / Field in Trust: it is the same road. But whilst the vision of Oxpens Road is one of openness, limited traffic speeds, shared spaces for pedestrian and cycle north-south routes (to and from the city centre for Oxpens new site residents and others), the proposed character of Thames Street as proposed currently by the Westgate Alliance is the exact opposite.

16. The redeveloped Westgate centre will face inwards onto courtyards and the Thames Street frontage will not be an “active frontage”, rather it will be the back of the shops with blank walls facing onto the Thames Street. Access for pedestrian and cyclists to the Westgate and city centre along existing routes will be more difficult than now, with Thames Street to cross and also the major Westgate access road will need to be crossed, this road leading to the proposed underground car park, bus access, long distance bus route, taxi access and loading and unloading vehicle access. The Westgate Centre redevelopment is effectively cutting itself off from (turning its back on) key areas of the West End and what is proposed for the Thames Street frontage of the Westgate Centre redevelopment will do absolutely nothing to promote the regeneration of the West End Area including links to the Oxpens site and it is not consistent with the WEAAP in general or the West End Design Code in particular.

17. Another potential implication of the Westgate Centre redevelopment on the Draft Oxpens SPD concerns flood risk and drainage. This is discussed below.

2.2. Strategic Environmental Assessment Screening Consultation

18. It is understood that the purpose of the SEA is to assess the likely significant effects that the Draft Oxpens SPD will have on the environment and it builds on work that was carried out in the Sustainability Appraisal (SA) of the West End Area Action Plan (WEAAP).

19. The main existing environmental issue relevant to the development of the Draft Oxpens SPD is flooding and flood risk. It is understood that as flooding was included in the scope of the SEA, further technical work was commissioned to examine how site development could be taken forward in relation to the flooding constraints. The technical work undertaken found that there are “sufficient uncertainties” associated with the current representation of flooding at Oxpens to cast doubt on the Environment Agency’s (EAs) Flood Map. This means that the impact of the Draft Oxpens SPD on water levels and flood risk is
not fully understood. As such the likelihood or geographical scale of any effect of the Draft Oxpens SDP, its significance, permanence or reversibility cannot be predicted or evaluated.

20. In other words (as also express in the SEA) it was considered that as the existing understanding of flood water and flood risk in the vicinity of the Oxpens site is rather rudimentary it was not possible to assess the implications of the draft SPD, but it was considered that the draft SPD could go forward on the understanding that there is a need for further and more detailed hydraulic modelling and understanding of flood risk to be completed as development of the Oxpens site proceeds. The text of the draft SPD was amended to reflect this uncertainty.

21. It was recommended that a more detailed analysis of flood risk is undertaken for the site, subsequent to the publication of the Draft Oxpens SPD, as better information becomes available and prior to the progression of the site beyond this draft stage. The Environment Agency are due to deliver an updated, and more representative, hydraulic model for the River Thames through Oxford during the summer of 2013, and this model will be used to identify development impacts and appropriate mitigation measures prior to the site being taken forward.

22. At the same time SENDRA understands that the Westgate Alliance has confirmed in preliminary studies that their redevelopment will have an impact on the drainage system and that a more detailed analysis is necessary of the drainage / flood risk implications of the Westgate redevelopment and especially the provision of the underground car park and diversion of Trill Mill stream. We also understand that the Westgate Alliance takes the view that flooding of the underground car park will be necessary at times of high flood risk.

23. Our request is that consideration of the Draft Oxpens SPD and the Outline Application for the Westgate Centre redevelopment should not precede the Environmental Agency update / modelling. We have been advised that the Environmental Agency may now be ready by September/ October 2013.

24. This is of particular concern to our Association’s members and we will need to be fully assured that the Draft Oxpens SPD and the Westgate redevelopments will not increase our flood risk and any possible impact of the Westgate redevelopment on the Draft Oxpens SPD should also be understood.

3. Detailed Comments on the Draft SPD

25. Detailed comments are made against the twelve specified Draft Oxpens SPD Design Principles.

DP1: A High Quality Development

26. Emphasis on this is welcome and it is agreed that delivery of a high standard of design in architecture, public realm and landscape will set the standard for subsequent development on other opportunities sites in the Oxford West End.

27. Although it is understood that this is consistent with WEAAP and Core Strategy policies and the Street Scene Manual, indicative strategies for facilitating this would be a welcome addition to the SPD. Reference might be made to the National Planning Policy Framework
Section 7 (Para. 58) and guidance available by English Partnerships’ “Urban Design Compendium”, CABE/Design Council’s “Design Wayfinder” and CHT’s “Manual for Streets 2”. For example the Oxpens site should have an advantage in that it is a city centre site with relatively high land value: can the location and value of the site be used to leverage high quality development?

DP2: Maximising the Value of the Site

28. It is in the centre of one of the most famous cities in the world and the site has advantages which will make it attractive to developers. Exploiting the full potential of the site does not necessarily mean seeking delivery of the maximum number of residential units and commercial floor space as suggested in the draft SPD. However it is agreed that development proposals should maximise development yield contributions to fund public improvements and that these could include improvements to Oxpens Road. It is agreed that the precise implications for viability will need to be considered and discussed at detailed stages of design within policy guidelines established in the WEAAP.

DP3: A Sustainable Scheme

29. It is emphatically agreed that Oxpens should showcase best practice in sustainable development:

30. **Managing water and flood risk** – please refer to Paragraphs 18 to 23.

31. **Improving connections** – comments are made here on the specific Draft Oxpens SPD Design Principles, but these should be read in connection with Section 2 of this submission.

32. It is agreed that development of the Oxpens site has the potential to improve connections in the Oxford West End. Public realm enhancements to Oxpens Road, Osney Lane and creation of new access routes through the Oxpens site will help to improve the ease of movement for all modes of transport in the Oxford West End. It is also agreed that routes for walking and cycling can be extended through the built area of the site, into and through Oxpens Meadow⁴, but given the city centre location of Oxpens much of the walking and cycling will be journey to / from work (or school), not only leisure as suggested in the Draft Oxpens SPD.

33. Oxpens Road – (Example Indicative Street Section A-A) - a 10m carriageway is indicated to incorporate pedestrian crossing points, right turn lane, cycle lanes in carriageway and staggered bus stops. It is difficult to see how cycle lanes could be included in a meaningful and safe way in the proposed format of Oxpens Road. No mention is made of the width of the proposed cycle lanes and there is no detail as to how these could be made to work on a priority bus route with bus stops located down each side.

34. Primary route through Oxpens Site (Example Indicative Street Section B-B) – a 10m carriageway is indicated with 1.5m min for cycle lanes and 6.5m for bus space. SUSTRANS recommendation is for 1.5m width cycle lane – does this mean that 1.5m would be allowed on either side of the road and that centre road markings be removed for remaining traffic?

35. Although it is accepted that the proposed new bridge crossing for pedestrians and cyclists will improve access across the River Thames (Isis) (for example to/from the Osney industrial area), it is suggested that an alternative would be to steer walkers and cyclists through the Meadow to the existing Gas Works Railway Bridge and pedestrian bridge and across the river to south Oxford and the towpath to Osney. An alternative would be to “hang” a pedestrian /cycle path bridge from the existing railway bridge across the Thames.

⁴ But please note our comments in Paragraph 60.
The Gas Works Railway Bridge might be another site for a summer-time café overlooking the river and private sector interest could be explored / facilitated).

36. **Sustainable building design** – It is agreed that built form at Oxpens should maximise sustainable building design to provide a flagship precedent scheme for future developments in the Oxford West End.

37. An associated issue is building height and it is recommended that this is monitored very closely. There is no disagreement with what is proposed in the Draft Oxpens SPD, but there is concern that guidelines are maintained as developers make proposals – and make every effort to maximise the value of the site. It is understood that heights are as defined in the WEAAP and will be applicable.

38. It is understood that the Natural Resources Impact Analysis (NRIA) requirements will require all qualifying developments to submit an NRIA checklist covering energy efficiency, renewable energy, recycled materials and water resources. It might be helpful to clarify this in the Draft Oxpens SPD.

39. In our earlier submission we noted that car parking areas and front gardens should be required to be permeable - reduce asphalt and paving to a minimum to allow rainwater to soak in rather than run-off into the river. We are pleased to see that this has been given more emphasis in the draft SPD. We also note the Royal Horticultural Society’s guidance on providing attractive, planted and permeable “front gardens” on which cars can be parked.

40. **Sustainable Urban Drainage (SUDS)** – this is not adequately discussed in the draft SPD. It is agreed that SUDS features should be incorporated and will include incorporation of the Oxpens Meadow, protected from development and retained as a green public open space as a large area for water infiltration, and drainage to the local watercourses. The capacity of the urban drainage system will need very careful attention and it is agreed that this will be developed through scheme designs.

41. **Sustainable Energy** - a number of additions have been made to the SPD as a result of the SEA process. The original draft SPD made no reference to the potential for an energy centre, but it is good to see that this has now been included. In terms of mitigating the impacts of climate change, this a significant step forward. It is noted that the SEA suggests further investigation of this topic as the development of the site moves forward as this could be a significant positive benefit for both the Oxpens site and the West End as a whole.

42. **City Centre Housing** – Although it is agreed that the development of the Oxpens site can make a significant contribution to social sustainability by providing valuable city centre homes, the array of housing provision should also take into account maximising value of the site (see above).

43. In our earlier submission we noted that there is a high risk in this development that private housing will attract the buy-to-let market especially being within easy access of the railway to London. We suggested that to mitigate this risk the introduction of "local occupancy clauses" should be considered which would mean that the properties could only be bought and sold on to people who have lived or worked in the area for at least three years. It is understood that a development agreement will block sales to investors and we look forward to seeing details of this.

44. We note that the size of units and amenity spaces is regulated for affordable housing but restate our concern that a 3 bedroom house at 85 m2 is in line with UK status of having the third smallest space for homes in Europe. A high quality development may need to be

---

5 Comments by City Council on SENDRA comments of the 1st draft Draft Oxpens SPD
based on a larger basic floor area. Holland, which also has restricted land, has a more generous 3 bed average house size of 115 m2.

45. **Open space per household** - It is agreed totally that all homes should have access to an area of private amenity space. That is quite different from access to communal gardens. It is recommended to delete the words "and / or communal gardens".

45. **Flats have no general parking allowance.** This is unlikely to be successful, although it is understood that it is adopted policy.

46. **Integrating movement options (car clubs, cycle facilities)** – It is agreed that cycle routes and provision for cycle storage and cycle parking including in the public realm and provision for car-sharing schemes are necessary infrastructure for sustainable transport. It is considered that the standards of provision suggested in the SPD are still not adequate although we are pleased to see that there is now clearer reference to parking standards and that cycle storage is given more emphasis in this later edition of the Draft Oxpens SPD.

47. **Public transport provision** depends to a large extent on the more strategic considerations discussed in Paragraphs 7 to 13.

48. **Creating employment opportunities** – as also noted in our earlier submission, the notes on this in Chapter 6 are not informative. Although the proposals of the Draft Oxpens SPD are consistent with the Oxford Economic Development Strategy, it is noted that the National Planning Policy Framework (NPPF) requires Local Authorities “to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth” (para. 21). Although this is a city centre site with advantages for facilitating economic growth, the proposals in the Draft Oxpens SPD are weak.

49. It is noted in the Draft Oxpens SPD that the Oxpens site can help to meet the Oxfordshire Local Enterprise Partnership (LEP) objectives for economic growth and boost inward investment. The identification within the Draft Oxpens SPD for land to accommodate business space, research and development uses and a hotel are essential in furthering the status and development of Oxford as a centre for knowledge intensive economies and will support further economic and employment growth.

50. In our previous submission we noted that perhaps use of the site currently assigned to student housing would be better assigned to economic activities and the City Council noted that commercial advisers suggest that the Oxpens Road is a better location to attract business users. This is understood, but we are still concerned that the site allocated to student housing is inappropriate and are pleased to note that flexibility on the use of the site still exists.

51. **Supporting the viability of the wider Oxford West End and City Centre** – we noted in our earlier submission that apart from office, research and development facilities and services the Draft Oxpens SPD includes a hotel with conference facilities. This was welcomed, but we suggested that the location may not be attractive to investors and that a site overlooking the Meadow and with access to the river may be more attractive. We also

---

6 Ibid
7 Please also see our comment on creating an up-market high revenue generating residential area, for example in Paragraph 64. Is the student housing provision compatible with this.
8 Please see earlier discussion of the Station and its possible relocation in Paragraphs 7 to 13 and Footnote 1.
noted that the facility could encompass a Meadow-side terrace café. The City Council response was that local members felt that the riverside amenity was primarily to be enjoyed by residents, not visitors. This is not to apply the principles of maximising value from the site and using the same commercial criteria applied to locating office accommodation elsewhere in the draft Draft Oxpens SPD. It was also noted that a hotel to the north of the site would be good for station links which appears to assume the redevelopment of the station fully on the existing site. But it is also noted that flexibility remains in land use allocations of this kind.

52. **Additional sustainability issues**

- Air and noise pollution

53. **Air Quality:** It is recognized that it will be important to reduce traffic congestion and associated air pollution by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car/lorry. This is one of the reasons why we recommend so strongly that a transport strategy for central Oxford including the key development sites in the West End Area is made available for proper consultation before any decisions are taken on any of the current consultation sites. The current ad hoc approach with each key development being formulated in isolation from the others will not lead to optimal transportation arrangements which improve travel choice, shorten length and duration of journeys and reduce the need to travel by car/lorry.

54. There is concern about the potential volume of traffic along Thames Street and Oxpens Road and the implications for both air pollution and noise. It is noted for example that scheduled coaches which could be routed along Oxpens Road are not currently influenced by any emissions control that the local Council might request. With increased bus transport down this route in addition to the scheduled coaches the road would be highly polluted. Please also note that the Oxpens SPD needs to be consistent with the proposals in the Draft Air Quality Action Plan (currently in consultation).

55. **Noise** - It is noted that noise management is not included in the sustainability issues. There needs to be more focus on noise abatement from the railway, possibly through screening with trees along the railway/Meadow boundary.

**DP4: Addressing Oxpens Road**

56. The measures to address Oxpens Road are very welcome although it may be difficult to achieve key features, for example potential level surfaces at access points (in front of the proposed Square for example) where traffic would be slowed to 10 mph. This will need to be considered in the context of the transportation issues described in Paragraphs 7 to 13.

**DP5: Improving Accessibility in Oxford’s West End**

57. Please see preceding comments.

**DP6: High Quality Public Realm: Streets and Spaces**

58. It is agreed that: (i) designs should be of high quality to create attractive streets and spaces as a setting for the new development; (ii) high quality street surfacing materials, street furniture, street trees and other landscape features should be applied to all streets and spaces to ensure continuity in design and appearance; and (iii) the Oxpens Square should be a new civic space of exceptional quality located in the heart of the Oxpens development. As noted above it would be useful to have strategies identified for the achievement of this quality. In this respect we are pleased to see reference to the Street Scene Manual in the Draft Oxpens SPD.

**DP7: Enhancing Oxpens Meadow**
59. It is very fully agreed that Oxpens Meadow is a valuable area of open green space. Proposals for enhancing the Meadow need to be cognizant of the terms of the Deed of Dedication agreed by the City Council and Fields in Trust. It is good to see that this is now clearly stated in the draft Draft Oxpens SPD.

60. There is still concern about “over-development” of the Meadow (the network of pathways is too dense) and it is recommended that the proposals made in the draft Draft Oxpens SPD are reviewed with these terms of use in mind. It is also good to note that the area covered by the Fields-in-Trust designation is now clearly indicated in every drawing showing Oxpens Meadow.

61. The SENDRA vision is a Meadow left in as natural a state as possible for "informal recreation" and if events take place on the Meadow it should be on a natural undeveloped Meadow. With the new residential and other developments proposed on the west side of the Meadow (residential, business, hotels and R&D) this demand will soar quite naturally but this does not mean that the Meadow needs to be developed into a formal inner city park.

DP8: Relationship to the River

62. Apart from the serious issue of flood mitigation discussed above, the proposals to maximise the opportunity of the river frontage to River Thames (Isis) and the Castle Mill Stream are welcomed. However and in respect of leisure walks and in particular along the banks of the Castle Mill Stream, care should be taken not to raise these to facilitate all weather / conditions use of the leisure walks – this could increase flood risk on the opposite side of the Castle Mill Stream. Please also note that the Castle Mill Stream and its banks form a bio-diversity corridor running from Hinksey Hill into the city centre and should be undisturbed – great care is needed to protect the corridor.

DP9: Appropriate Land Use Mix

63. It is agreed that Oxpens should accommodate an appropriate mixture of land uses. Because the overall Draft Oxpens SPD concept is not entirely clear (for example is it to enhance city centre functions or is it a suburban development with city centre connections), the adequacy of the mix of land uses is difficult to assess. For economic growth it is agreed that there should be provision of floor-space for general office use and more bespoke units for research and development, if it is considered that there is market demand. In a city centre development emphasis would perhaps be on this land use, although the urgent need to provide residential development including affordable residential development is understood. The balance depends on the development concept and the underpinning need to maximise the value of the site, creating public realm spin-off benefits.

64. It is not thought that student accommodation is an essential component of the land-use mix in this city centre development. In any event, such a land use should not be used as a noise filter. It is agreed that the hotel and the complementary land uses such as a smaller elements of retail, food, drink and professional services would be good to include in the development and should be actively encouraged, but attracting investments of these kinds will not be easy with extensive alternatives nearby.

65. Please also refer our comments on the Railway Station relocation – clarification is needed on whether this is still being considered and if not, why not.

DP10: Generating Activity

66. It is noted that all buildings are accessed from the street to maximise on-street activity. Retail units and eating and drinking establishments would be particularly appropriate at the ground floor around Oxpens Square and Oxpens Road, encouraging activity in the public realm.

DP11: Coherent character
67. In our earlier submission we noted that: "It is agreed that the development of Oxpens should be defined by a sense of place and character to help create a sense of place and the proposals for this are all agreeable. In terms of the cohesion of the area in which the Oxpens site is located it is important that the Westgate Centre development does not turn its back on Oxpens (as was the case with the earlier Westgate Centre development). The Draft Oxpens SPD makes great efforts to connect the site to the West End and the city centre, it would be disappointing to see a Westgate Centre development proposal which does not respond to this".

68. As noted above the proposal for the Westgate redevelopment is exactly as feared. The City Council response to our earlier comments was: "Agree – links to Westgate are to be referred to in the document (Draft Oxpens SPD). We draw attention to the lack of consistency between the Westgate Alliance current thinking about the Thames Street frontage and the West End Design Code.

DP12: Phasing

69. It is understood that development proposals for the Oxpens site should take account of the potential need to phase development in stages. It is noted in the Draft Oxpens SPD that the site of the Oxford Ice Rink (sited on Oxford City Council land facing Oxpens Road) and the Oxford Business Centre (on the western edge of the site) are two existing features that are likely to remain in the medium-to-long term. This is understood in phasing terms.

70. However it is not certain that relocation of the Ice Rink is something which all would welcome. It is a regional level facility and a careful study would need to be made of the use of the rink and alternatives available. But note should also be taken that the Ice Rink is also seen to be something of an icon, under-maintained, but still an icon, and was the first public commission of Sir Nicholas Grimshaw.

4. Closing Remarks

71. We cannot stress too highly that Oxford currently has a once-in-a-century opportunity to create a new quarter of architectural and commercial value that could provide the city with a keynote development, recognisable as world-class by visitors from similar European cities and around the world. We would like to work with you to help to ensure that the combination of the Station redevelopment, Westgate redevelopment and Oxpens SPD contribute effectively to meet the objectives of the WEAAP.

72. We understand that following the six-week period of statutory public consultation, responses received will be processed, analysed and reported in a revision to this statement. Please be assured that we are ready at any time to discuss any or all of the issues raised in this submission and particularly the recommendations made in Paragraphs 13 and 23.

Yours sincerely,
Cc
Bob Price, Oxford City Council, (Leader), Councillor for Hinksey Park Ward
Oscar Van Nooijen, Oxford City Council (Chairman, Planning Committee), Councillor for Hinksey Park Ward
John Tanner, Oxfordshire County Council, Councillor for Isis Division
Chip Sherwood, Oxfordshire County Council, Councillor for Isis Division

David Edwards Oxford City Council, Executive Director, City Regeneration
Michael Crofton-Biggs, Oxford City Council, Head of City Development

Fiona Piercy, Oxford City Council / Oxfordshire County Council, Partnerships and Regeneration Manager

Martin Tugwell, Oxfordshire County Council, Deputy Director (Strategy and Infrastructure Planning)
Oxfordshire Local History Association

Posted At: 29 July 2013 07:47
Posted To: planningpolicy@oxford.gov.uk
Subject: Oxpens Masterplan SPD: comments from OLHA

Turn to next page
These comments, submitted on behalf of Oxfordshire's thriving local-history community, focus on the unique opportunity provided by the Oxpens development of relocating the Oxfordshire History Centre in a prime and central location, creating a flagship resource commensurate with the worldwide cultural significance of both city and county.

1. OLHA (registered charity no. 281851) represents the thriving amateur local-history movement in both Oxford city and the county. We have in membership about 170 individual members and 60 local societies which include a further 2,400 members. We publish a newsletter three times a year and a journal once or twice a year. The latter especially is a platform for publication of research by our members, while a number of our member societies publish their own journals devoted to the history of a particular town or parish. All this work depends heavily (as does that of the county’s many family historians) on the Oxfordshire History Centre (OHC), which combines the statutory work of the county record office (formerly in the basement of County Hall) with part of the local history collections (formerly housed with the Central Library in the Westgate building). The OHC is currently located in the deconsecrated St Luke’s church, Temple Road, Cowley.

2. The Oxpens plan provides an opportunity which we shall press upon the city and county councils to give OHC an adequate home in the centre of the city where, in addition to providing a first-class research facility, the history of Oxfordshire and Oxford can be displayed in a fitting manner which will contribute to the cultural scene and to the enjoyment of locals and tourists alike.

3. The present siting of OHC is regrettable on three main grounds:

   (i) It is apparent that the centre will have run out of space for fresh acquisitions within less than a decade. When this happens the county council will be in breach of its statutory obligations unless in the meantime more ample space is found for the archives.

Moreover a substantial portion of the city’s 19th and 20th century archives are currently housed in poor conditions in the town hall and are to a large extent unsearchable. It is obviously desirable that this resource should be under the same roof as the OHC or adjacent to it.
(ii) St Luke’s is more than two miles south-east of Carfax. There is a bus service of reasonable frequency to and from the city centre and there are a dozen or so parking spaces on site; otherwise motorised visitors have to find on-street parking in the mainly residential area of Temple Cowley, which is difficult when not impossible.

Visitors to OHC come from all parts of the county and beyond. And it is not surprising in view of Oxford’s and Oxfordshire’s national and international historic importance that people from the rest of Britain and abroad also wish to use of this facility. All these types of visitors need to be able to reach OHC easily from the station (approximately 25 minutes by bus), the bus station or one of the park-and-ride facilities. The bus station is several minutes walk from a bus route to Temple Cowley. Persons using the park-and-ride service must first travel into the city centre by the bus service and then change onto the bus to Temple Cowley.

All this is discouraging, not to say daunting especially to anyone unfamiliar with public transport in Oxford.

(iii) The Cowley site is cramped and has no room for expansion. Apart from the disadvantages outlined above, this means that OHC is unable to mount the displays, exhibitions and talks which are a normal part of the activities of record offices and local-studies libraries elsewhere in Britain. Oxford and Oxfordshire’s history are an unparalleled resource, yet when it comes to mining that resource we are poor relations.

4. The redevelopment of the Oxpens area provides an opportunity to return the OHC to a more central and convenient location where it can play its full role in the cultural life of the city and county. We are encouraged to make this point because the Westgate proposals already include a main public library facility (obviously an allied service) and also because the Oxpens supplementary planning document holds out a warm welcome to public sector and cultural developments.

5. Policy WE24 of the West End Area Action Plan states that

   planning permission will be granted for the creation of new facilities that will add diversity to the cultural scene, such as cultural attractions, artists’ studios, galleries and museums.

We therefore urge that, as these proposals are taken forward, the city should, in partnership with the county council and stakeholder groups such as ourselves, identify a suitable site for a future Oxfordshire History Centre within the
development area, one which will enable the creation of a facility fully appropriate to its cultural and historic context.

29 July 2013
Oxpens Supplementary Planning Document (SPD): further comment by the Oxfordshire Local History Association (OLHA)

1. This association¹ is naturally concerned about the historic Oxford skyline and the impact of extensive new building adjacent to the historic city – especially in view of the recent controversies over the university’s blocks of flats on the edge of Port Meadow and the proposed Blavatnik School of Government in Walton Street. We realise of course that the SPD does not contain specific proposals for individual buildings: however there are general principles which concern us and which we consider that the city must take into account now.

2. Concerning building heights, our fear is that far too much of the Oxpens development will be at the Carfax-standard height (18.2m). The effect of this will be a horizontal skyline instead of the irregular and at points spiky one which existing policies are supposed to protect. This does not mean that we want to see massive towers all over the place, much as some developers and architects might wish for them; there is, however, no magic in five-storey uniformity.

3. We can see little evidence that the authors of the SPD have taken account of English Heritage’s Conservation Principles. For instance paragraphs 76 and 77 of that document enjoin paying attention to the ‘setting’ and ‘context’ of a development. The SPD is full of worthy words about the quality of design sought, with which we have no quarrel per se. However, we suggest that the total outcome brought about by adherence to the plan will be bland.

4. The master plan refers to the well-known official viewpoints, as though the unofficial viewpoints have no validity. English Heritage is currently funding the Oxford Views Study² undertaken by the Oxford Preservation Trust and Oxford City Council. We have not been able find any reference to this study in the SPD; however the latter is not a readily searchable document and we may have missed something. The Oxford Views Study aims to broaden consideration of views and to ensure that their complexity and significance are not damaged. In any case we should surely consider views looking out from and within the

¹ For more details about OLHA, see our separate primary comments on the SPD, paragraph 1.
² See http://www.oxford.gov.uk/PageRender/decP/OxfordViewsStudy.htm
Oxpens area as well. Some reassurance that the significance of such views will be promoted and protected would be welcome.
Dear City Council,

Oxpens Masterplan Supplementary Planning Document (SPD)

We welcome attempts to upgrade this almost forgotten quarter so that it can play its part in both providing unmet needs of Oxford as well as helping to support the rest of the city centre.

We wish to make the following comments.

General Layout
While there are some interesting features and ideas, the area between the railway line and Oxpens Road seems extremely cramped and the allocation of space for housing and for the hotel and office accommodation appears transposed from what should be a more logical layout.

Infrastructure
Oxpens provides a vital general transport link across the city centre. It is important that any rejigging of the route, involving Beckett Street, ties in with changes to be made in Frideswide Square. Appropriate designs and measures should be used to enable a reasonable flow of traffic on Oxpens Road, enabling cars to get into car parks quickly and efficiently and delivery and service vehicles to get as close to their destinations as possible.

The bus routes indicated seem to be an improvement on the current situation but passenger access across the city centre needs to be reviewed.

The plans for improved cycle and pedestrian ways are good in theory but there needs to be better access to the river from the northern end of Oxpens Road across the main development site.

River Frontage
It is good that the whole river frontage is opened up along the bank but in reality most of it will be well and truly hidden from the city by the tall buildings proposed for the scheme.

A view is needed from the Oxpens Road as it begins its sweep south eastwards from the north.

Provision for cafe and similar facilities will be good.

Housing
The allocation of family housing would be far better to the north, linking in with the remaining part of St Ebbes. This would take up the space currently given over to the hotel, offices and apartments. The apartments could be moved south next to the family housing, with the student accommodation kept to the west.

This would enable the housing sector to have some degree of privacy while opening up access to the river for more general public use.

Hotel
Would this not be better placed at the south western corner of the built environment, next to the railway line but with views towards the river? An hotel in this location would offer far more to visitors than the planned site and could possibly provide better facilities.

Offices
Surely, these would be better sited further south near and opposite the Oxford and Cherwell College.

Retail
The thinking on this is not too clear. Should it be an appendage to the expanded Westgate, of a smaller variety linked to riverside activities or of a convenience nature, supporting the new residential accommodation? Perhaps, once the main parts of the masterplan have been revised after this stage of consultation, the choices will be more obvious.

Oxpens Square
This seems to be a rather weird idea tucked away on the edge of Oxpens Road, surrounded by high rise buildings. With a better layout, it may be possible to have some sort of square in a better location that opens up on at least one side with views of the river.

Ice Rink and other leisure facilities
Policy WE 28: Leisure states that “Opportunities for leisure should continue to be provided in the Oxpens area” and yet, it appears that the ice rink will be forced out of the city centre at some stage and there do not appear to be plans to put anything too meaningful back.

The centre of Oxford has good public transport links to enable many people to access such facilities rather than have always on the outskirts, relying on car transport.

With a large commuter work force in the centre for most of the day and many young visitors without their own means of transport, it makes sense to have some decent leisure facilities within the centre, whether that includes a new ice rink or not. Having it close to the river would be a real additional attraction for Oxford alongside the historic and cultural venues.

Oxpens is a key part of Oxford and it is vital that the opportunity to develop its potential to help create a much better balanced city centre for the future is grasped.
We ask that you have a major rethink on the layout and on the provisions contained with the scheme.

Yours sincerely,
Dear City Council,

I am responding on behalf of Cyclox, the Cycling Campaign for Oxford, in my capacity as its chair. Cyclox is primarily a campaigning organisation, lobbying for improvements to Oxford’s cycle network, and other measures to support cycling in Oxford. Cyclox was formed in 2003, and is recognised as the leading voice for cyclists in Oxford. Cyclox runs public meetings most months, and has an active committee with more than a dozen members.

Cyclox aims to represent the range of cyclist voices in Oxford, focusing on the normal-clothes everyday adult cyclist, and family cycling. This range of cyclists is provided for in Oxford using a “dual” network of cycle lanes and similar treatments on the main roads, and a separate network of quiet routes, primarily for family cycling. In the city centre, you can pretty much expect cyclists to use every available route, though they will prefer the straighter ones.

As a rule, Cyclox seeks provision for cyclists alongside the promotion of bus services, and provision for pedestrians. In the city centre, our view is that cyclists and pedestrians can successfully share pedestrianised streets, with no need for specific regulation; video studies have shown that cyclists adapt their behaviour appropriately in response to pedestrian density. There are laws to prosecute inconsiderate cycling, if there really is an issue.

Obviously the illustrations available are at a very early stage of development, and while we welcome the priority given to cycling in the ‘lower order streets’, it is clear that cycling will be popular and necessary on Oxpens Road, the main route through Oxpens. The treatment of Oxpens Road creates new mini-roundabouts which are known to cause unnecessary stress to cyclists, especially less experienced ones.

We would especially like to see something more sympathetic to cycling than illustrated in ‘EXAMPLE INDICATIVE STREET SECTION A–A: OXPENS ROAD: ENHANCEMENT OF EXISTING STREET’ and ‘EXAMPLE INDICATIVE STREET SECTION B–B: MAIN STREET THROUGH OXPENS SITE.’

We like the homezone approach of ‘EXAMPLE INDICATIVE STREET SECTION D–D: RESIDENTIAL STREET’.

Routes to the site are unclear (particularly Bonn Square to ice rink) and we would like to stress the importance of a coherent north-south cycle route from Bonn Square via the Oxpens site, particularly to destinations south and west.

There is the space at Oxpens including on the main through-route to create a truly wonderful cycling environment, one that Oxford and its cyclists can be proud of, and at zero detriment to pedestrians and drivers. Let’s make sure the cycling experience you create here is gold standard. Oxford deserves this much.

We note the minimum standards at ‘Cycle Parking Standards’ have four comments:

a) Most city cycle stands are too close together to comfortably insert and extract a bike when another is parked alongside - please can stands be spaced at a good 800-1000mm between each stand.

b) Please consider the different parking needs of staff (longer periods – sometimes day-long) from shorter-stay shoppers. It would be sensible to provide cycle parking for staff out of the public gaze.
They will appreciate an extra degree of security, and perhaps a better guarantee of a regular space. This will also reduce the extent to which they take over prime “short-stay” bike parking. Cyclists tend to make shorter and more-frequent shopping trips, often en route between other activities. They will value having cycle parking close to where they want to shop, and won’t use cycle parking if it’s hidden round the corner. So we would highly recommend the provision of cycle parking, in the street environment, as close to each entrance as practical - this is referred to briefly on p99 of the SPD. In particular, we would recommend providing cycle parking very close to any food shops.

c) Please bear in mind the needs of cyclists with trailers, tagalongs, electric batteries and three wheels, all of which are getting bigger on the agenda. Planners tend to think only of conventional two-wheelers. This suggestion applies to through-routes as well.

d) Please plan also for electric bike-charging points.

We hope we can provide more meaningful input when the detail of road designs are up for discussion. We appreciate that the proposal is at a very outline stage at the moment, but are keen to make sure that the positive references to cycling (and walking) scattered throughout the main SPD document are backed up with what the cycling community - especially the normal utility cyclist (slow, non-Lycra’d, and not your stereotypical cycling fan) will agree are attractive and sound on-the-ground provisions.
Dear Sirs

Consultation on Oxpens Supplementary Planning Document (SPD) and the associated Strategic Environmental Assessment (SEA)

In response to the public consultation on the documents referred to above, we wish to make the following comments, observations and recommendations. We would be obliged if, in the further development of the Oxpens Supplementary Planning Document, you would kindly have regard to these.

1. The draft Oxpens SPD has been reviewed and the review has also been informed by our involvement in the on-going consultations on the Westgate Centre Redevelopment and associated city centre transport proposals and the Railway Station Redevelopment Master Plan preparation. We have also had discussions with SENDRA, a fellow association which represents the residents of an area neighbouring the site of the Oxpens SPD. Our comments, most of which are shared with SENDRA, are set out in the following paragraphs.

General

2. We very much support the redevelopment of the Oxpens as an essential component of the regeneration of the West End Area of Oxford. We share the view that the Oxpens site represents one of the most significant development opportunities in Oxford city centre and has the potential to make a valuable contribution to the life and economy of the local area and Oxford as a whole.

3. We agree that the site, between Oxford Railway Station, the Westgate Centre and the River Thames, provides an opportunity to deliver much-needed housing and local amenities. We are also aware that the Oxford City Council has an adopted Core Strategy and West End Area Action Plan which outline the policies for development on the Oxpens site along with other key West End development sites, such as Oxford Station, Frideswide Square and the Westgate Centre. Our comments address the way in which proposals for the Oxpens and these other key West End development sites interpret these policies and interact with each other.

4. In particular please note especially Paragraph 13 and Paragraph 23 which present recommendations which we consider to be high priority.

Coordinated and Synchronized West End Area Regeneration

5. The West End Area Action Plan (WEAAP) states: "........ Oxford’s West End does not match Oxford’s worldwide reputation, or live up to its potential as an urban quarter of the highest quality. There is an opportunity for radical improvement to the environmental quality of the West End, to create a sense of place, the type of place that people enjoy living in, working in and visiting."
The intention is to create an area with a vibrant mix of new homes, retail and employment uses, community facilities and cultural attractions that meet the needs of Oxford’s residents and visitors. It is also recognized that there is an opportunity to improve access and movement and to create a good network of routes and connections that allow safe and efficient movement for all modes of travel.

6. We like the vision of this WEAAP statement and consider that many aspects of the Draft Oxpens SPD reflect this. But we are very concerned that current preparation of proposals for the Oxpens site, the Oxford Station redevelopment and the Westgate Centre redevelopment do not seem to be integrated in pursuit of the vision.

Transportation Strategy for the West End Area / City Centre

7. Each of the three West End key sites which we discuss in this submission has major transportation implications. The Oxpens site will generate transport demand and will supply important routes to and from the redeveloped Oxford Station including to and from the redeveloped Westgate Centre. The Master Plan for the Oxford Station redevelopment may include consideration of the relocation of the station or some station uses to the Becket Street car park, adjoining the Oxpens site, or further south into the Oxpens site\(^1\). The anticipated increased rail routes and services available through the redeveloped Oxford station will increase demand for transportation to and from the station, further emphasizing the need for a transportation hub, supporting all modes of transport. The Westgate Centre redevelopment will increase demand for transportation in the West End area.

8. To be frank we are very surprised that currently, while being asked to comment on the development of all three major West End sites there is very little information available about the characteristics of demand for transportation services. There are currently no estimates available of the numbers of rail users and where they will be travelling to on arrival in Oxford, or from, when they travel to the station and what mode of transport will be used. It is currently the same for the Westgate Centre – there is no estimate available of numbers of Westgate users needed to make the Westgate redevelopment viable, where they will come from and how they will travel\(^2\). The demand for transportation services required for the developed Oxpens site is easier to calculate based on the Draft Oxpens SPD using its assumptions on residential and commercial supply but what is not known is how the proposed Oxpens road system will be affected by the final decision on the location of the station, the characteristics of station-generated transport demand, and the characteristics of Westgate Centre-generated transport demand. We attach at Appendix 1 our response to the consultation by the County Council on a proposed transport strategy for the redeveloped Westgate.

9. One particular implication of this concerns Oxpens Road. A core design concept of the Draft Oxpens SPD is the transformation of Oxpens Road into a tree-lined boulevard, with limited traffic speeds and free pedestrian movements across it from the existing and new developments to the south and west. The objective is a re-connection of communities, which we strongly support. But this core design concept, which we like very much, appears to have been prepared without information being available about future uses of Oxpens Road linked to the station and Westgate redevelopments. Clearly the implications need to be fully understood before the Draft SPD.

\(^1\) We have examined the Terms of Reference for the Station Redevelopment Master Plan and note unhelpful inconsistency in the requirements to consider a relocation site in Oxpens: is a move to Oxpens ruled out (final Paragraph of Section 3) or ruled in (Section 4 page 8 Paragraph 2)? We also note that the Draft Oxpens SPD cursorily states that relocation of the Station to Oxpens is inappropriate, but no explanation is given of why this is so and when and by whom this decision was made.

\(^2\) We understand that the travel characteristics of existing Westgate shoppers and the catchment area of the Westgate redevelopment have been studied but findings have not been available to us. We understand that this traffic generation information will be available in the Transport and Access Report which will accompany the Outline Planning Application (Currently scheduled for September 2013) but without this information it is not possible to adequately comment on the transportation aspects of the Draft Oxpens SPD.
Oxpens SPD can be approved\(^3\). The Oxpens Road treatment is a core design concept and if it is not feasible, the Draft Oxpens SPD would need to be reconsidered as a whole.

10. The Strategic Environmental Assessment (SEA) notes that transport modelling work has been carried out and this work looked at a number of options for a junction accessing the Oxpens development from Oxpens Road, as well as ensuring that the roads within the development were sufficient to carry the type of vehicles expected. This implies that it was the internal transportation arrangements which were modelled. Our concern is that the Westgate development and the role of Oxford as a key entrepôt in the growth of the sub region’s Knowledge Economy (see City Deal documentation) will generate significantly greater demand for transportation to/from the area and the sub region. What is needed is modelling of the West End area taking into account the implications of many more journeys and modal shifts. Without such modelling we believe that the plans are unsound.

11. The key development sites in the West End area could also be seen in the context of other imminent major investments in transport infrastructure involving rail services, roads and cycling facilities in and around Oxford which will have a strategic effect on issues such as travel behaviour, travel modes and connectivity of journeys. The proposals presented in this consultation show no evidence of consideration of interactions with other key West End area developments or these strategic effects.

12. We have many other detailed comments on the proposed transportation arrangements but without more strategic information being made available it is premature to go into detail.

13. We highly recommend that a transport strategy for central Oxford is made available for proper consultation and is carried out before any decisions are taken on any of the current consultation sites. The geographical scope of the transport strategy will need to be wider than that provided in the exhibition of the Westgate Alliance consultation and indeed consideration needs to be given to the city wide implications of the development of these key West End area developments, as well as the implications of future growth, not just within the city, but as a consequence of Oxford being at the epicentre of a major ‘knowledge economy’ in the region.

**Westgate Centre Redevelopment**

14. We have attended the exhibition of this redevelopment and have met representatives of the Westgate Alliance to discuss their proposals. We have a number of concerns about the emerging design of the Westgate Centre redevelopment, which have an impact on the Draft Oxpens SPD. We attach as Appendix 2 the observations we have already made to the Westgate Alliance regarding the Westgate redevelopment proposals as presented to date.

We have mentioned above that the Draft Oxpens SPD proposes the transformation of Oxpens Road into a tree-lined boulevard with limited traffic speeds and free pedestrian movements across it from the existing and new developments to the south and west and that this excellent proposal needs to be justified in terms of the amount and types of uses Oxpens Road will need to accommodate.

We are concerned that the Westgate redevelopment proposals suggest a character for Thames Street which is not consistent with the character proposed for Oxpens Road in the Draft Oxpens SPD. Oxpens Road becomes Thames Street roughly opposite the proposed site of the John Lewis Store and more or less opposite the entrance to the Oxpens Meadow / Field in Trust: it is the same road. But whilst the vision of Oxpens Road is one of openness, limited traffic speeds, shared

\(^3\) Advice was given that the Draft Oxpens SPD would only go to public consultation after availability of the Draft Station Redevelopment Master Plan. The Draft Station Redevelopment Master Plan is not yet available as far as we are aware, although reference was made to it by the Westgate Alliance in a recent meeting. In the meantime there is a consultation on the Draft Station Redevelopment Master Plan, but in the absence of any draft Station Redevelopment proposals there is really not much to discuss.
spaces for pedestrian and cycle north-south routes (to and from the city centre for Oxpens new site residents and others), the proposed character of Thames Street as proposed currently by the Westgate Alliance is the exact opposite. The redeveloped Westgate centre will face inwards onto courtyards and the Thames Street frontage will not be an "active frontage", rather it will be the back of the shops with blank walls facing onto the Thames Street. Access for pedestrian and cyclists to the Westgate and city centre along existing routes will be more difficult than now, with Thames Street to cross and also the major Westgate access road will need to be crossed, this road leading to the proposed underground car park, bus access, long distance bus route, taxi access and loading and unloading vehicle access. The Westgate Centre redevelopment is effectively cutting itself off from (turning its back on) key areas of the West End and what is proposed for the Thames Street frontage of the Westgate Centre redevelopment will do absolutely nothing to promote the regeneration of the West End Area including links to the Oxpens site and it is not consistent with the WEAAP in general or the West End Design Code in particular.

18. Another potential implication of the Westgate Centre redevelopment on the Draft Oxpens SPD concerns flood risk and drainage. This is discussed below.

Strategic Environmental Assessment Screening Consultation
It is understood that the purpose of the SEA is to assess the likely significant effects that the Draft Oxpens SPD will have on the environment and it builds on work that was carried out in the Sustainability Appraisal (SA) of the West End Area Action Plan (WEAAP).

The main existing environmental issue relevant to the development of the Draft Oxpens SPD is flooding and flood risk. It is understood that as flooding was included in the scope of the SEA, further technical work was commissioned to examine how site development could be taken forward in relation to the flooding constraints. The technical work undertaken found that there are “sufficient uncertainties” associated with the current representation of flooding at Oxpens to cast doubt on the Environment Agency’s (EAs) Flood Map. This means that the impact of the Draft Oxpens SPD on water levels and flood risk is not fully understood. As such the likelihood or geographical scale of any effect of the Draft Oxpens SPD, its significance, permanence or reversibility cannot be predicted or evaluated.

21. In other words (as also express in the SEA) it was considered that as the existing understanding of flood water and flood risk in the vicinity of the Oxpens site is rather rudimentary it was not possible to assess the implications of the draft SPD, but it was considered that the draft SPD could go forward on the understanding that there is a need for further and more detailed hydraulic modelling and understanding of flood risk to be completed as development of the Oxpens site proceeds. The text of the draft SPD was amended to reflect this uncertainty.

It was recommended that a more detailed analysis of flood risk is undertaken for the site, subsequent to the publication of the Draft Oxpens SPD, as better information becomes available and prior to the progression of the site beyond this draft stage. The Environment Agency are due to deliver an updated, and more representative, hydraulic model for the River Thames through Oxford during the summer of 2013, and this model will be used to identify development impacts and appropriate mitigation measures prior to the site being taken forward.

23. At the same time we understand that the Westgate Alliance has confirmed in preliminary studies that their redevelopment will have an impact on the drainage system and that a more detailed analysis is necessary of the drainage / flood risk implications of the Westgate redevelopment and especially the provision of the underground car park and diversion of Trill Mill stream. We also understand that the Westgate Alliance takes the view that flooding of the underground car park will be necessary at times of high flood risk.

Our request is that consideration of the Draft Oxpens SPD and the Outline Application for the Westgate Centre redevelopment should not precede the Environmental Agency update / modelling. We have been advised that the Environmental Agency may now be ready by September/ October 2013.
Detailed Comments on the Draft SPD

25. Detailed comments are made against the twelve specified Draft Oxpens SPD Design Principles.

DP1: A High Quality Development

26. Emphasis on this is welcome and it is agreed that delivery of a high standard of design in architecture, public realm and landscape will set the standard for subsequent development on other opportunities sites in the Oxford West End.

27. Although it is understood that this is consistent with WEAAP and Core Strategy policies and the Street Scene Manual, indicative strategies for facilitating this would be a welcome addition to the SPD. Reference might be made to the National Planning Policy Framework Section 7 (Para. 58) and guidance available by English Partnerships’ “Urban Design Compendium”, CABE/Design Council’s “Design Wayfinder” and CHT’s “Manual for Streets 2”. For example the Oxpens site should have an advantage in that it is a city centre site with relatively high land value: can the location and value of the site be used to leverage high quality development?

DP2: Maximising the Value of the Site

28. It is in the centre of one of the most famous cities in the world and the site has advantages which will make it attractive to developers. Exploiting the full potential of the site does not necessarily mean seeking delivery of the maximum number of residential units and commercial floor space as suggested in the draft SPD. However it is agreed that development proposals should maximise development yield contributions to fund public improvements and that these could include improvements to Oxpens Road. It is agreed that the precise implications for viability will need to be considered and discussed at detailed stages of design within policy guidelines established in the WEAAP.

DP3: A Sustainable Scheme

29. It is emphatically agreed that Oxpens should showcase best practice in sustainable development:

30. Managing water and flood risk - please refer to Paragraphs 18 to 23.

31. Improving connections – comments are made here on the specific Draft Oxpens SPD Design Principles, but these should be read in connection with Section 2 of this submission.

32. It is agreed that development of the Oxpens site has the potential to improve connections in the Oxford West End. Public realm enhancements to Oxpens Road, Osney Lane and creation of new access routes through the Oxpens site will help to improve the ease of movement for all modes of transport in the Oxford West End. It is also agreed that routes for walking and cycling can be extended through the built area of the site, into and through Oxpens Meadow[4], but given the city centre location of Oxpens much of the walking and cycling will be journey to / from work (or school), not only leisure as suggested in the Draft Oxpens SPD.

33. Oxpens Road – (Example Indicative Street Section A-A) - a 10m carriageway is indicated to incorporate pedestrian crossing points, right turn lane, cycle lanes in carriageway and staggered bus stops. It is difficult to see how cycle lanes could be included in a meaningful and safe way in the proposed format of Oxpens Road. No mention is made of the width of the proposed cycle lanes and there is no detail as to how these could be made to work on a priority bus route with bus stops located down each side.

34. **Primary route through Oxpens Site (Example Indicative Street Section B-B)** – a 10m carriageway is indicated with 1.5m min for cycle lanes and 6.5m for bus space. SUSTRANS recommendation is for 1.5m width cycle lane – does this mean that 1.5m would be allowed on either side of the road and that centre road markings be removed for remaining traffic?

35. Although it is accepted that the proposed new bridge crossing for pedestrians and cyclists will improve access across the River Thames (Isis) (for example to/from the Osney industrial area), it is suggested that an alternative would be to steer walkers and cyclists through the Meadow to the existing Gas Works Railway Bridge and pedestrian bridge and across the river to south Oxford and the towpath to Osney. An alternative would be to “hang” a pedestrian/cycle path bridge from the existing railway bridge across the Thames. The Gas Works Railway Bridge might be another site for a summer-time café overlooking the river and private sector interest could be explored / facilitated).

36. **Sustainable building design** – It is agreed that built form at Oxpens should maximise sustainable building design to provide a flagship precedent scheme for future developments in the Oxford West End.

37. An associated issue is building height and it is recommended that this is monitored very closely. There is no disagreement with what is proposed in the Draft Oxpens SPD, but there is concern that guidelines are maintained as developers make proposals – and make every effort to maximise the value of the site. It is understood that heights are as defined in the WEAAP and will be applicable.

38. It is understood that the Natural Resources Impact Analysis (NRIA) requirements will require all qualifying developments to submit an NRIA checklist covering energy efficiency, renewable energy, recycled materials and water resources. It might be helpful to clarify this in the Draft Oxpens SPD.

39. We note that car parking areas and front gardens should be required to be permeable - reduce asphalt and paving to a minimum to allow rainwater to soak in rather than run-off into the river. We also note the Royal Horticultural Society’s guidance on providing attractive, planted and permeable “front gardens” on which cars can be parked.

40. **Sustainable Urban Drainage (SUDS)** – this is not adequately discussed in the draft SPD. It is agreed that SUDS features should be incorporated and will include incorporation of the Oxpens Meadow, protected from development and retained as a green public open space as a large area for water infiltration, and drainage to the local watercourses. The capacity of the urban drainage system will need very careful attention and it is agreed that this will be developed through scheme designs.

41. **Sustainable Energy** – a number of additions have been made to the SPD as a result of the SEA process. The original draft SPD made no reference to the potential for an energy centre, but it is good to see that this has now been included. In terms of mitigating the impacts of climate change, this a significant step forward. It is noted that the SEA suggests further investigation of this topic as the development of the site moves forward as this could be a significant positive benefit for both the Oxpens site and the West End as a whole.

42. **City Centre Housing** – Although it is agreed that the development of the Oxpens site can make a significant contribution to social sustainability by providing valuable city centre homes, the array of housing provision should also take into account maximising value of the site (see above).
43. There is a high risk in this development that private housing will attract the buy-to-let market especially being within easy access of the railway. It is understood\textsuperscript{[5]} that a development agreement will block sales to investors and we look forward to seeing details of this.

44. We note that the size of units and amenity spaces is regulated for affordable housing but restate our concern that a 3 bedroom house at 85 m\textsuperscript{2} is in line with UK status of having the third smallest space for homes in Europe. A high quality development may need to be based on a larger basic floor area. Holland, which also has restricted land, has a more generous 3 bed average house size of 115 m\textsuperscript{2}.

45. Open space per household - It is agreed totally that all homes should have access to an area of private amenity space. That is quite different from access to communal gardens. It is recommended to delete the words "and / or communal gardens".

46. Flats have no general parking allowance. This will only be successful if exemplary public transport provision is made within the Oxpens development area.

47. \textit{Integrating movement options (car clubs, cycle facilities)} – It is agreed that cycle routes and provision for cycle storage and cycle parking including in the public realm and provision for car-sharing schemes are necessary infrastructure for sustainable transport. It is considered that the standards of provision suggested in the SPD are still not adequate although we are pleased to see that there is clear reference to parking standards and that cycle storage is given more emphasis in this later edition of the Draft Oxpens SPD.

48. Public transport provision depends to a large extent on the more strategic considerations discussed in Paragraphs 7 to 13.

49. \textit{Creating employment opportunities} – the notes on this in Chapter 6 are not informative. Although the proposals of the Draft Oxpens SPD are consistent with the Oxford Economic Development Strategy, it is noted that the National Planning Policy Framework (NPPF) requires Local Authorities “to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth” (para. 21). Although this is a city centre site with advantages for facilitating economic growth, the proposals in the Draft Oxpens SPD are weak.

50. It is noted in the Draft Oxpens SPD that the Oxpens site can help to meet the Oxfordshire Local Enterprise Partnership (LEP) objectives for economic growth and boost inward investment. The identification within the Draft Oxpens SPD for land to accommodate business space, research and development uses and a hotel are essential in furthering the status and development of Oxford as a centre for knowledge intensive economies and will support further economic and employment growth. The Oxpens site also offers a unique potential for accommodation of a fully-functional transport interchange based on the replacement of the existing railway station, which should be properly explored.

51. In our previous submission we noted that perhaps use of the site currently assigned to student housing would be better assigned to economic activities and the City Council noted that commercial advisers suggest that the Oxpens Road is a better location to attract business users. This is understood, but we are still concerned that the site allocated to student housing is inappropriate and are pleased to note that flexibility on the use of the site still exists\textsuperscript{[6]}. We also note that the site allocated to student housing is also the site which could be the site of the Station relocation\textsuperscript{[7]}; this land use on this site would offer much better asset value for adjacent commercial properties, and, with appropriate design, could provide continuity of access through to Westgate

\textsuperscript{[5]} Comments by City Council on SENDRA comments of the 1\textsuperscript{st} draft Draft Oxpens SPD
\textsuperscript{[6]} Please also see our comment on creating an up-market high revenue generating residential area, for example in Paragraph 64. Is the student housing provision compatible with this.
\textsuperscript{[7]} Please see earlier discussion of the Station and its possible relocation in Paragraphs 7 to 13 and Footnote 1.
and the commercial heart of the city. It would also release land on the existing Station and forecourt site for student housing. If the relocated Station was redeveloped as a transport hub, the existing bus station site in Gloucester Green may also be available for student housing and/or other types of development.

52. **Supporting the viability of the wider Oxford West End and City Centre** – apart from office, research and development facilities and services the Draft Oxpens SPD includes a hotel with conference facilities. This was welcomed, but we suggested that the location may not be attractive to investors and that a site overlooking the Meadow and with access to the river may be more attractive. We also noted that the facility could encompass a Meadow-side terrace café. The City Council response was that local members felt that the riverside amenity was primarily to be enjoyed by residents, not visitors. This is not to apply the principles of maximising value from the site and using the same commercial criteria applied to locating office accommodation elsewhere in the draft Draft Oxpens SPD. It was also noted that a hotel to the north of the site would be good for station links which appears to assume the redevelopment of the station fully on the existing site. But it is also noted that flexibility remains in land use allocations of this kind. This flexibility should be applied also in consideration of the accommodation, either here or in reasonably close proximity elsewhere, of existing facilities or services which will necessarily have to be re-located.

53. **Additional sustainability issues**

Air and noise pollution

54. **Air Quality:** It is recognized that it will be important to reduce traffic congestion and associated air pollution by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car and freight transport by lorry. This is one of the reasons why we recommend so strongly that a coordinated transport strategy for central Oxford including the key development sites in the West End Area, as part is developed and made available for proper consultation before any decisions are taken on any of the current consultation sites. The current ad hoc approach with each key development being formulated in isolation from the others will lead to neither optimal transportation arrangements to improve travel choice, shorten journeys and reduce the need for road traffic, nor the achievement of satisfactory air quality in the city locations which have, for many years, remained unresolved air pollution hot-spots.

55. **There is concern about the potential volume of traffic along Thames Street and Oxpens Road and the implications for both air pollution and noise.** It is noted for example that scheduled coaches which could be routed along Oxpens Road are not currently influenced by any emissions control that the local Council might request. With increased bus transport down this route in addition to the scheduled coaches the road would be highly polluted. Please also note that the Oxpens SPD needs to be consistent with the proposals in the Draft Air Quality Action Plan (currently in consultation). This Plan makes a reference to a ‘rapid transit’ system, and it is suggested that, with the current planned scale of development in the centre of the city, the time is now appropriate to consider seriously the feasibility of such a system. It is noted that new tram systems have already been introduced successfully in many comparable cities across mainland Europe.

56. **Noise** - It is noted that noise management is not included in the sustainability issues. There needs to be more focus on noise abatement from the railway, possibly through screening with trees along the railway / Meadow boundary, and the application of relevant rail engineering techniques, such as the use of acoustic dampers on rails, and sound-damping rail sleepers. Such measures will clearly necessitate close cooperation with Network Rail in the forthcoming reconstruction of the local rail infrastructure.

DP4: Addressing Oxpens Road

57. **The measures to address Oxpens Road are very welcome although it may be difficult to achieve key features, for example potential level surfaces at access points (in front of the proposed**
Square for example) where traffic would be slowed to 10 mph. This will need to be considered in the context of the transportation issues described in Paragraphs 7 to 13.

DP5: Improving Accessibility in Oxford’s West End

58. Please see preceding comments.

DP6: High Quality Public Realm: Streets and Spaces

59. It is agreed that: (i) designs should be of high quality to create attractive streets and spaces as a setting for the new development; (ii) high quality street surfacing materials, street furniture, street trees and other landscape features should be applied to all streets and spaces to ensure continuity in design and appearance; and (iii) the Oxpens Square should be a new civic space of exceptional quality located in the heart of the Oxpens development. As noted above it would be useful to have strategies identified for the achievement of this quality. In this respect we are pleased to see reference to the Street Scene Manual in the Draft Oxpens SPD.

DP7: Enhancing Oxpens Meadow

60. It is agreed that Oxpens Meadow is a valuable area of open green space. Proposals for enhancing the Meadow need to be cognizant of the terms of the Deed of Dedication agreed by the City Council and SENDRA. It is good to see that this is now clearly stated in the draft Draft Oxpens SPD.

61. There is still concern about “over-development” of the Meadow (the network of pathways is too dense) and it is recommended that the proposals made in the draft Draft Oxpens SPD are reviewed with these terms of use in mind. It is also good to note that the area covered by the Fields-in-Trust designation is now clearly indicated in every drawing showing Oxpens Meadow.

62. The vision is a Meadow left in as natural a state as possible for "informal recreation" and if events take place on the Meadow it should be on a natural undeveloped Meadow. With the new residential and other developments proposed on the west side of the Meadow (residential, business, hotels and R&D) this demand will soar quite naturally but this does not mean that the Meadow needs to be developed into a formal inner city park.

DP8: Relationship to the River

63. Apart from the serious issue of flood mitigation discussed above, the proposals to maximise the opportunity of the river frontage to River Thames (Isis) and the Castle Mill Stream are welcomed. However and in respect of leisure walks and in particular along the banks of the Castle Mill Stream, care should be taken not to raise these to facilitate all weather / conditions use of the leisure walks – this could increase flood risk on the opposite side of the Castle Mill Stream. Please also note that the Castle Mill Stream and its banks form a bio-diversity corridor running from Hinksey Hill into the city centre and should be undisturbed – great care is needed to protect the corridor.

DP9: Appropriate Land Use Mix

64. It is agreed that Oxpens should accommodate an appropriate mixture of land uses. Because the overall Draft Oxpens SPD concept is not entirely clear (for example is it to enhance city centre functions or is it a suburban development with city centre connections), the adequacy of the mix of land uses is difficult to assess. For economic growth it is agreed that there should be provision of floor-space for general office use and more bespoke units for research and development, if it is considered that there is market demand. In a city centre development emphasis would perhaps be on this land use, although the urgent need to provide residential development including affordable residential development is understood. The balance depends on the development concept and the underpinning need to maximise the value of the site, creating public realm spin-off benefits.
65. It is not thought that student accommodation is an essential component of the land-use mix in this city centre development. In any event, such a land use should not be used as a noise filter. It is agreed that the hotel and the complimentary land uses such as a smaller elements of retail, food, drink and professional services would be good to include in the development and should be actively encouraged, but attracting investments of these kinds will not be easy with extensive alternatives nearby.

66. Please also refer our comments on the Railway Station relocation – clarification is needed on whether this is still being considered and if not, why not.

DP10: Generating Activity
67. It is noted that all buildings are accessed from the street to maximise on-street activity. Retail units and eating and drinking establishments would be particularly appropriate at the ground floor around Oxpens Square and Oxpens Road, encouraging activity in the public realm.

DP11: Coherent character
68. In terms of the cohesion of the area in which the Oxpens site is located it is important that the Westgate Centre development does not turn its back on Oxpens (as was the case with the earlier Westgate Centre development). The Draft Oxpens SPD makes great efforts to connect the site to the West End and the city centre: it would be disappointing to see a Westgate Centre development proposal which does not respond to this.

69. We also draw attention to the lack of consistency between the Westgate Alliance current thinking about the Thames Street frontage and the West End Design Code.

DP12: Phasing
70. It is understood that development proposals for the Oxpens site should take account of the potential need to phase development in stages. It is noted in the Draft Oxpens SPD that the site of the Oxford Ice Rink (sited on Oxford City Council land facing Oxpens Road) and the Oxford Business Centre (on the western edge of the site) are two existing features that are likely to remain in the medium-to-long term. This is understood in phasing terms.

71. However it is not certain that relocation of the Ice Rink is something which all would welcome. It is a regional level facility and a careful study would need to be made of the use of the Ice rink and alternatives available. But note should also be taken that the Ice Rink is also seen to be something of an icon, under-maintained, but still an icon, and was the first public commission of Sir Nicholas Grimshaw.

Closing Remarks
72. We cannot stress too strongly that Oxford currently has a once-in-a-century opportunity to create a new quarter of architectural and commercial value that could provide the city with a keynote development, recognisable as world-class by visitors from similar European cities and around the world. We consider that a unique opportunity also exists to make a major improvement to the city’s transportation systems through the enhancement of inter-modal interchange and the facilitation of seamless journey experiences. Such measures would lead to substantial reductions in pollutants and enhancements of air quality. We would like to continue to work with you to help to ensure that the combination of the Station redevelopment, Westgate redevelopment and Oxpens SPD contribute effectively to meet the objectives of the WEAAP.

73. We understand that following the six-week period of statutory public consultation, responses received will be processed, analysed and reported in a revision to this statement. Please be assured that we are ready at any time to discuss any or all of the issues raised in this submission and particularly the recommendations made in Paragraphs 13 and 23.
Response to Oxfordshire County Council on the proposed transport strategy for the redeveloped Westgate Centre and city centre

5th July 2013

Dear Sirs

Westgate transport and streetscape proposals – consultation response

The single plan setting out these proposals is far too simplistic to provide a basis for meaningful consideration of their detail. However, we would nevertheless make the following observations:

The lack of information about the traffic likely to be generated by the Westgate redevelopment (with doubling of the floor space) inhibits any meaningful assessment of the proposals. The fundamentally important missing estimates are: of how many shoppers / Westgate users there need to be for the Westgate redevelopment to be viable, where they are likely to be coming from and how are they likely to be travelling.

The proposals as illustrated make no reference to the Oxford City Council Oxpens Masterplan, currently in consultation, of which the County cannot be unaware. Apart from common sense, there is now a statutory duty for Local Authorities to cooperate, and it is incomprehensible that the County Council’s proposals make no mention of the City Council’s actions or objectives. In particular, has any assessment been made of the effect on the City Council’s proposals for the transformation of Oxpens Road into an urban boulevard, with extensive new residential development adjacent, of the re-routeing of buses on this route, and, if so, has this been accepted by the City Council?

The introduction of a new signalised junction at the south-west corner of the new Westgate development is at odds with City Council proposals for the transformation of the character of Oxpens Road and Thames Street. Likewise, the suggested new signalised junction at the south-east corner of the Westgate site seems inconsistent with the proposals of the City Council, and the inclusion of new bus stops on Speedwell Street and Thames Street needs careful consideration.

Oxfordshire County Council, Oxford City Council and Network Rail have jointly commissioned a masterplan for the development of Oxford Station; preparation of this masterplan will include consideration of the option of the re-location of the station south of its current position, and the integration of the rail facilities with a bus interchange, and services for cyclists and pedestrians. The conclusions of this masterplanning will inevitably have a bearing on the nature, routeing and frequency of all kinds of traffic in the area covered by the Westgate proposals, yet neither the developer’s proposals, nor those of the County Council relating to transport issues make any reference at all to the masterplanning currently in progress for Oxford Rail Station, nor to that for the Oxpens areas. This is a very serious omission.

The imminent major investment in transport infrastructure involving rail services, roads and cycling facilities in and around Oxford will have a strategic effect on issues such as travel behaviour, travel
modes and connectivity of journeys. Indeed, the purpose of the investment is to do just that. The proposals presented in this consultation show no evidence of consideration of any of these strategic effects. For example, rail travel, cycling and walking are all already showing dramatic increases, yet the proposals map gives no indication of any provision of improved access to the city centre or the new Westgate from the railway station. Likewise, there is no indication of any provisions to encourage or accommodate increased numbers of cyclists. This is at odds with the County and City Councils’ stated policies for promotion of cycling in Oxford.

The suggested new route for London and Airport coaches via Hollybush Row and Park End Street will add a large number of additional large vehicles to these roads. Has any assessment of the effects on congestion and general journey times been made, if not, why not, and if so, what are the conclusions? Specifically, has any assessment been made of the effect on schedules for London and Airport bus services of the re-routeing proposals?

No details are provided of the ‘improvements’ to the Speedwell Street/St Aldates junction to handle additional bus traffic, nor any data on what the volume of additional traffic is likely to be. No mention is made of any need for ‘improvements’ to the junction at Hollybush Row/Park End Street to enable additional bus traffic to be accommodated.

The junction of Hollybush Row/Park End Street forms one corner of Frideswide Square, the most notorious congestion and urban environmental black-spot in Oxford. Why does the map exhibited not show the newly-developed Frideswide Square re-configuration proposals, since these have Cabinet approval for implementation? What assessment has been made of the effects of introducing London and Airport coach service vehicles on the newly-developed proposals for the re-configuration of Frideswide Square? What assessment has been made on the effect on journey times of these services, of the proposed re-configuration?

The additional vehicles which would be routed along Hollybush Row and Park End Street are exclusively diesel-engined and would contribute to the levels of NO and PM_{2.5} pollutants, which are currently regarded as the most serious detractors from air quality in urban areas. Has any assessment of the effects of these additional vehicles on air quality been made, if not, why not, and if so, what were the conclusions, bearing in mind the already poor standards of air quality in several locations in the city centre?

The text ‘To Station’ shown on New Road is meaningless. Thames Street/Oxpens Road leads equally to the station, by a shorter route from, say, the John Lewis store. It is unclear if the orange line represents the ONLY bus route (so that no buses except London and Airport services would use Hollybush Row), or if this merely represents altered routes.

No details of the actual bus services for each route are provided, and no analysis of journey times for each affected service is provided; the acceptability or otherwise of the proposed re-routeing is thus impossible to judge.

What quantitative assessment has been made of the effects of removal of bus services from Queen Street? How have the benefits been measured and evaluated against the adverse effects? Without data on this assessment, it is impossible to comment on the acceptability of the proposal.

The removal of bus services from Queen Street, and their diversion onto a new route which deliberately incorporates additional 90° corners seems likely to make the journey time from the Castle to Carfax excessive, to the detriment of those incapable of walking between them. The consequences of this seem likely also to deter bus travel generally. Since public transport will be critical to the success of the new Westgate development, any actions which make its use less attractive will be detrimental.

It is impossible to comment on the ‘improvements’ to pavements, pedestrian crossings and bus stops since no information is provided; for bus stops, the number, nature and frequency of the bus movements, and hence the dimensions and layout of the stops, and the relationships and
dimensions of footpaths, cycle tracks and carriageways, and the materials used in the ‘improvements’, are key factors in assessing the merits of the proposals, yet none of this information has been provided.

No indication is shown of any proposals for the improvement of Old Greyfriars Street, Turn Again Lane or the lower end of St Ebbe’s Street, yet these are part of the public realm which will be closely associated with the new Westgate development, as evidenced by the reference to the location of taxi drop-off/pick-up here. It will be important to the success of the development that all the surrounding public realm is improved consistently.

In conclusion, the proposals shown on the ‘Wider transport proposals’ map are far too simplistic, with far too little evidence of detailed consideration having been given, to enable any judgement to be made of the overall acceptability. As presented, the proposals appear to be a very superficial sketching out of some possible solutions, with little or no consideration of many of the key issues and consequences, without which the merits simply cannot be judged.

Yours sincerely
APPENDIX 2

Comments on the proposals for redevelopment of the Westgate Centre as exhibited July 2013

Oxford: Westgate Redevelopment: Feedback on consultation

Following the recent exhibition of the current proposals for the redevelopment of Westgate, and some discussion amongst members of our Planning and Transport Groups, I thought it appropriate to provide you with some feedback.

There are two key principles relating to the development which we consider are critical: attracting as many people to it as possible, and the contribution it makes to the local built environment in terms of architecture and public realm enhancement. I am sure you are in agreement with at least the first of these!

We do not feel that it is appropriate or even possible to make Oxford competitive with places like Milton Keynes and Reading by replication of the facilities provided there. Rather, Oxford can and should provide a unique environment in which to linger, browse, socialise, and enjoy the unrivalled historic and cultural attributes, as well as engaging in shopping activities. The new Westgate should be striving to enhance this environment both in quantity and quality, building on the current attractions of the city in order to create a uniquely pleasurable experience for visitors of all kinds. This would be consistent with your previous advice to us that Oxford needs to attract more of the wealth of its hinterland, and thus optimise its commercial investment value.

Oxford is also unique, of course, in the topographical constraints of its river systems and floodplains, and the layout of its historic built environment. Because of this, transportation issues are always one of the major ‘opportunities’ to be resolved. Oxford already enjoys almost unparalleled cycle usage, a unique Park & Ride system, high levels of bus ridership, and train passenger numbers that are rising dramatically.

Given the inevitable levels of traffic congestion most new shoppers attracted to Westgate from outside Oxford will be taking advantage of the public transport system. Of course, City & County Councils will require financial contributions, and we would urge the Westgate Alliance to demand radical improvement of public transport connectivity as an important element in the commercial success of the development. In particular we believe that a transportation hub including rail and bus interconnection should be as close to the development as possible. This would benefit not only retail customers, but the 3,000 employees likely to be accessing Westgate daily.

Use of trains is, as I am sure you are aware, rising rapidly, especially in Oxford. Network Rail and the train operating companies are investing massively, Oxford Station is due to be re-built very shortly and there is even discussion of reinstatement of long-disused lines to re-connect Witney and towns beyond. The main Banbury – Birmingham and Cotswold Lines already provide quick and convenient access direct to the city centre from parts of that ‘wealthy hinterland’, more of whose residents you would presumably like to attract, and the soon-to-be connected link to the Chiltern Line will extend this facility. The Westgate presentation provided little evidence of any consideration of rail transport issues, or of connectivity across transport modes.
We are concerned that proposals such as for the withdrawal of buses from Queen Street, and new routeings have been presented (both by yourselves and the County Council), but with little or no information on what new routes might be established, how existing services might be re-routed, how better connectivity with, say, the north of the city (one of its most affluent areas) can be achieved, or numbers and frequency of services. All these factors are clearly important in determining layouts, space provision or the adequacy or acceptability of the proposals. The City and County Councils, together with Network Rail have now commissioned a masterplan for the station area. The brief to the appointed consultant stipulates that consideration should be given to the possibilities of re-location of the station southwards, i.e. nearer to the John Lewis store which anchors your development. You will recall that we have been calling for re-consideration of this option (which was originally mooted in 2004) for some time. Coincidently, Oxford City Council is currently consulting on its own recently-prepared Oxpens Masterplan. The area this relates to is, of course, immediately adjacent to your development site.

We are concerned that the Westgate proposals as presented show little evidence of any consideration of either of these masterplanning activities, yet they deal with extensive regeneration of an important near-central area, immediately adjacent to the Westgate site, and involving new housing, commercial uses and a hotel, as well as the key transport facilities. It is hard to see how the successful redevelopment and extension of Westgate can ignore plans which will effectively establish the future context into which it is to be placed. As an example, the Oxpens Masterplan shows transformation of Thames Street and Oxpens Road into a tree-lined boulevard, with limited traffic speeds and free pedestrian movements across it from the existing and new developments to the south. The objective is a re-connection of communities, which we would strongly support. Neither your proposals, not those of the County Council show such enhancement of Thames Street, merely engineering solutions for motor traffic associated with the Westgate development. Cycling is a hugely important mode of transport in Oxford, and both the City and County Councils have policies to significantly increase the attractiveness of cycling. These are gradually being implemented, and we consider that development of the design proposals for the new Westgate should involve proper appraisal of the likely cycle traffic generation, flows and routes, and the facilities which will be required to accommodate and encourage this traffic. These issues will obviously influence road and access layouts, as well as parking and storage. The proposals presented give no indication that adequate consideration has been given to cycling as a significant mode of transport, as, of course, it already is in Oxford.

In terms of the architecture of the proposed new development, we are very concerned that it should ‘connect’ with its surroundings. As currently shown, not only are your proposals for Thames Street apparently inconsistent with the designs and philosophy being developed by the City Council, the ‘dead’ facades exacerbate the current disconnection of the city centre from its immediate surroundings. The whole of the elevation to Old Greyfriars Street is shown as totally inactive at ground level (‘activity’ at higher levels is a somewhat disingenuous concept!). Likewise, for nearly all of Thames Street, and much of Castle Street and Norfolk Street, the proposed designs for the new buildings will clearly do nothing to stimulate human activity at street level, nor to facilitate connectivity with the surroundings. This is perhaps especially important in respect of the Castle, which could, with better connectivity, complement Westgate as its historic leisure and cultural quarter. The current Westgate proposals appear inward-looking in a manner inappropriate to a 21st-century solution for city-centre development, and redolent of the sterile exterior of the development it will replace! The surrounding streets seem designed to ‘contain’ rather than connect both vehicle traffic and pedestrians, as well as visually, and look likely to ensure the isolation of the new development from its surroundings, rather than its integration at the heart of the city.

I hope that you will accept these comments as constructive suggestions for the improvement of the current proposals, in the interests of both yourselves, as developers, and the shoppers, visitors and residents of the city, now and long into the future.

Yours sincerely,
RESPONSE TO OXFORD CITY COUNCIL CONSULTATION ON OXPENS MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT

The Confederation of Passenger Transport (CPT) is the trade association for operators of buses, coaches and light rail systems. CPT represents over 1000 companies ranging from all the major bus and coach companies in the UK through to a considerable number of SME’s and sole traders.

CPT cannot support Oxford City Council’s Oxpens Masterplan Supplementary Planning Document in its current format as there are no satisfactory arrangements in place for the coaches that will be displaced by the development plans.

It is CPT’s view that the city council has underestimated the value of coaches to the economy of Oxford and in addition has not taken into account the diverse types of coach services operating from or visiting the city, the differing needs of the passengers travelling on those coaches as a result together with the environmental and traffic impacts of displacing coaches as proposed. In addition, there seems to have been no account taken of the needs of coach passengers with mobility impairments.

It is noted that the master plan allows for the retention of the Ice Rink, a site that is likely to be a trip attractor for groups that could travel by coach. The master plan also details that the site will encompass a hotel with the potential to accommodate a 150 bedroom hotel and conference facility, again a likely trip attractor of groups travelling by coach.

Whilst the city council first contacted CPT last week on temporary arrangements for coach parking whilst works relating to John Lewis store takes place, no discussions have yet taken place or an agreement reached. CPT has not been consulted in relation to the Oxpens Masterplan and given that a coach park forms a significant part of the existing development it would have been appropriate to seek our advice at the planning and design stage ahead of any consultation process.

CPT therefore suggests that the city council formally meets with ourselves to discuss the proposals and how arrangements for coaches and their passengers can be suitably accommodated. Ahead of any such meeting it would be useful to have sight of the bus and coach related sections of the Transport Assessments undertaken for the development.
Liberal Democrat Group, Oxford City Council

Posted At: 30 July 2013 10:00
Posted To: planningpolicy@oxford.gov.uk
Subject: Oxpens consultation response
Importance: High

Dear planning policy

I am commenting on behalf of the Liberal Democrat group on Oxford City Council.

We welcome the proposals to reinvigorate this part of Oxford and provide much-needed housing in a well-planned urban setting. We are, however, disappointed at the much lower number of dwellings now proposed compared to the previous West End plans.

We recognise the opportunity presented to provide a contribution to the Knowledge Spine of the City Deal bid proposals and support the allocation of a site for a new Design and Innovation Centre or similar academic institution to augment the excellent facilities and work of the Said Business School.

Given the very welcome confirmation of a new Westgate Centre with a John Lewis store and as many as 70 new retail units, we question the need for yet more retail units on the Oxpens site. Land Securities have modified their plans for the Westgate in view of current trends in retail, allocating more space to leisure uses such as restaurants and a cinema.

It seems odd in the present climate of encouraging small business start-ups and knowing that there is a need for incubator units, to propose to demolish the existing small business units and replace with student accommodation. We acknowledge that there is an ongoing need for more student accommodation, but feel that this site is much better suited to small business and start-up units with facilities to support them.

Oxford needs more hotel accommodation and a central site is sensible with improved rail links bringing people in from all around. But this site is better used to increase the supply of new housing in a well-designed community setting, with plenty of open space, trees and planting to enhance the environment. There are other sites better suited to hotel use, just as close to the railway station and with excellent links to the city centre.

The city already suffers from excessive in-commuting; more housing as well as more jobs is needed to redress the balance and keep the city thriving. We suggest that Oxpens should provide for many more dwellings perhaps as many as 600 or 700, no new retail, small business units beside the railway line and that any new hotel should be provided elsewhere. The area needs very sensitive and careful planning to make it a good place to live- children’s playgrounds will be needed for flat-dwellers in particular and generous planting will improve the air quality and benefit the residents.