

OXFORD
CIVIC SOCIETY



SHAPING OXFORD'S FUTURE

OXFORD STATION SPD CONSULTATION

**Comments from Oxford Civic Society
Transport Group**

ABSTRACT

We suggest that recent developments have made the current SPD out of date. We argue that the station area should be incorporated into a much larger Masterplan that makes the most of the opportunities for commercial investment in development and provide transport and housing solutions that will relate to the whole of the Central Oxford West area, to provide the City with a new quarter that will be vibrant, successful and a fitting gateway to 21st century Oxford.

Transport Group

Oxford Civic Society, August 19th 2017

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1 EXECUTIVE SUMMARY

1. We largely agree with the SPD Vision and Objectives, and support the aim of a single transport hub. However, the SPD has a number of serious defects:

- It relates to an out-of-date West End AAP (Area Action Plan), and is therefore out of date in planning terms.
- The AAP predates many recent local railway changes, which make it essential that numbers of predicted station users are revised to take account of these, before any design is put forward to accommodate the space required inside and outside the station.
- Although the SPD mentions the highly significant planned developments at the Westgate Centre, Oxpens, Osney Mead and the island Hythe Bridge Street/Park End Street (Oxford Central West), it does not attempt to relate to them or attempt to achieve any synergy with them.
- Separating the bus station and the rail station will mean even poorer transfer arrangements than at present.
- There are no details of the proposed bus routes serving the bus station; in view of the narrow streets (Becket Street, Osney Lane, Hollybush Row) it will be important to establish whether or not these streets can support the proposed number of buses, and the implications for the functioning of Frideswide Square. A recent publication by Stagecoach Bus Company gives an insight into good practice in designing new bus routes¹.
- Despite the City's 'Cycling City' aspirations and County policy, no details are provided of the provision of safe cycle routes in the area.
- The Rapid Transit, one of the County's principal proposed sustainable solutions to Oxford's traffic problems, is not mentioned at all.
- The absence of credible estimates for the cost of widening the Botley Road Bridge and deepening the roadway beneath it raise important questions about the viability of the whole scheme.

2. We believe that the cramped nature of the present rail station site means that many of the aspirations for a better gateway to Oxford are largely unrealizable - we have argued for a very long time that the new transport hub stands a much better chance of being funded if it were located at the Oxpens. We do urge that the station area should be redeveloped as part of a single masterplan for the Oxford Central West area. We appreciate that this will be difficult and require major re-thinking of the present mixture of smaller scale masterplans to be part of a single masterplan for the Oxford Central West area, but believe that the City and surrounding region would gain hugely from this wider coordinated development to produce a flagship new quarter for the City.

3. We also urge that no enhancement of station facilities on the present site should be developed until an alternative route for much W-S bound traffic has been established to limit traffic on the eastern part of the Botley Road. The current station site is simply not viable as an entry to different parts of the city with current traffic levels, let alone any increase which might come through expanded city activities.

4. We also question the relationship between the preparation of the Oxford Local Plan 2036 and its constituent and current city-wide and city centre transport studies. Surely the outcome of these studies and their incorporation into the draft Local Plan should be synchronised with the preparation and finalisation of the Station SPD?

5. The comments below follow the structure of the SPD Draft 4 document

¹ <http://www.stagecoach.com/~media/Files/S/Stagecoach-Group/Attachments/pdf/bus-services-and-new-residential-developments.pdf>

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2 INTRODUCTION

2.1 SCOPE AND ROLE OF SPD

6. As stated in pp.10-11 of the document, it sits beneath the West End AAP “parent” document. However, the AAP document dates from 2007, expired in 2016, and is out of date. It is also noted on p.12 that the SPD does not form part of the development plan, which would allow it to be superseded by a revised SPD. In particular the AAP was written before any of the major developments at the Westgate Centre, Oxpens, and around Frideswide Square and Osney Mead Industrial Estate referred to in the **Background** section (p.8) and the island site between Hythe Bridge Street and Park End Street had come on to the horizon (*these areas together will be referred to below as **Oxford Central West***). It also predates the expansion of rail services to Bicester and Marylebone under Chiltern Railways’ Evergreen 3 scheme, the plans to re-open East-West Rail to Bedford, Milton Keynes and Cambridge and the planned electrification of the main GWR line to London and South Wales, all of which will increase the footfall at the rail station and the need for good intermodal transfer.

7. We therefore wholeheartedly agree that “the area around the railway station is set to change significantly over the next 10-15 years with major developments under way or planned at the Westgate Centre, Oxpens, and around Frideswide Square and Osney Mead Industrial Estate. It is important that the redevelopment of the station area complements these planned developments so as to ensure the western side of the City Centre forms a well-integrated and highly connected urban quarter” (p.8). The failure to allow for the expansion of rail services follows on from the statement (ibid) “the SPD builds on rather than reinvents the previous masterplan process”, though it is acknowledged later (ibid) that the SPD “represents one way in which the development could be delivered adhering to the principles” (of the masterplan), suggesting that better alternatives could be possible. There is, however, little sign of any consideration of other alternatives that take account of the huge opportunities that are afforded by the simultaneous coming together of the various major developments.

8. It is noted on the same page that “the masterplan was prepared in conjunction with the Train Operating Company and Network Rail. Changes to the station operation will need to be further tested as the design is developed”. A vital part of station operation from the point of view of users is easy transfer between rail and other modes, including bus, cycle, walking and the County’s proposed Rapid Transit. This ease of transfer, which encourages people to use the railway as part of their journeys, all too often appear to be neglected by rail companies and Network Rail. There are currently three Train Operating Companies using the station, (First) Great Western, Arriva Cross-Country and Chiltern Railways, not just one.

9. In this connection it is not clear whether the use of the word “should” in “The new station should provide a vastly improved level of amenity and experience” (p.10) is an aspiration or a requirement. The reference to the 2015 architectural competition is unfortunate in this context as in our view none of the designs offered the flagship gateway desired, and internal space was in most cases inferior to that offered in the existing station. The ease of modal transfer was also worse, despite the Oxford Core Strategy (2011) identifying “the need for specific infrastructure improvements, for example, the existing single storey structure of the station has limited passenger circulating and waiting space, basic facilities and poor retail offering” (p.12).

10. We agree with the objectives and priorities listed on p.10, provided that these are taken in a wider view encompassing the surrounding major developments in Oxford Central West, which we believe can offer a much better solution to the expansion of the station and its incorporation into a new transport hub. Full advantage should be taken of the opportunity for the development of the station area to establish strong connections with other nearby development sites, such as the Oxpens, land around Frideswide Square, the Westgate Centre and Osney Mead Industrial Estate”, “as well as the Botley Road” (ibid). We consider that this draft SPD does not demonstrate this.

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11. We also question the relationship between the preparation of the Oxford Local Plan 2036 and its constituent and current city-wide and city centre transport studies. Surely the outcome of these studies and their incorporation into the draft Local Plan should be synchronized with the finalisation of the Station SPD?

2.2 PLANNING AND TRANSPORT OVERVIEW

12. In our view “balancing the transport system in favour of sustainable transport modes” (NPPF, quoted on p.12) means three things:

- a) good provision is made for such modes, which include all forms of public transport, cycling and walking,
- b) that transfer between such modes is made as easy as possible (part of the County Transport Strategy, as noted on p.12), and
- c) that public transport should be as emission-free as possible.

13. Any proposal to expand the rail station should be judged against these criteria. The widening of the Botley Road Bridge is a separate issue, which raises a number of road planning issues, which are not dealt with in the SPD, but which may critically affect its financial viability.

14. Unfortunately the separation of the bus station and the rail station proposed in the SPD worsens the situation compared to the present as regards (a) and (b) above, and although the provision of more cycle parking spaces improves the present situation, the provision of some of them on the south side of the Botley Road is less satisfactory. The increase in the number of rail services should reduce emissions and thus satisfy condition (c), though the current failure to electrify the railway to and through Oxford counteracts this to some extent. The County Transport Strategy to develop links along the ‘Knowledge Spine’ could best be fulfilled in these terms according to the proposals for a “Spine Line” rail service to link key sites notably between Harwell, Milton Park, Culham, Oxford and Begbroke, by providing a frequent fast rail service to compete with the congested A34 and approach roads. This fairly obvious possibility would of course have a further influence upon the space requirements for Oxford station, requiring a degree of future-proofing.

3 SPD VISION AND OBJECTIVES

3.1 MISSION STATEMENT AND OBJECTIVES

(We list these with our comments *in italics*)

- **To provide an exemplary gateway to Oxford that**
 - Emphasises key links with the city centre and reinforces historic street patterns and character. *With the various developments moving the City Centre westwards, the station site is less closely linked to the City centre. In particular Hythe Bridge Street and Park End Street offer poor, crowded and unattractive links to the centre. The narrow mediaeval street patterns are ill suited to cope with the current level of public transport, and the wider redevelopment within the Oxford Central West area offers possibilities for improved access by public and private transport.*
 - Improves wayfinding. *This is largely a function of labelling of pedestrian and public transport routes; the present level could be greatly improved. The proposed location of the bus station hundreds of metres from the station is counter-intuitive.*
 - Facilitates multi-modal exchange opportunities to ensure seamless integration with strategic and local transport networks. *See comment above about relocation of the bus station. The increased provision of cycle parking is welcomed.*

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- Enables high quality architectural and urban design. *Unfortunately the station location is constrained physically. The presence of the Botley Road as the major East-West highway running through the centre of the site also limits what can be achieved in terms of urban design.*
- Dovetails with planned wider development. *We agree that this is vital, but the SPD pays little attention to the possibilities for a more coherent and significant masterplan covering the Oxford Central West area and its links to the core city centre.*
- **To meet operational demands for expected rail growth over the next 30 years and offer an improved passenger experience, helping Oxford deliver economic and housing growth**
 - *The clear need is for 4 through platforms and two through lines for freight. These are provided in the current SPD, but modal interchange (part of the improved passenger experience) is a key part of any station, and the current SPD offers worse passenger experience than the current station. The immediate relevance of the SPD to help Oxford deliver economic and housing growth is not clear, though the development of a wider Masterplan for Oxford Central West would make this much easier, by offering a wider range of possibilities.*
- **To act as a catalyst to wider regeneration in Oxford**
 - *Maximising appropriate commercial, economic, development opportunities. These will be hugely increased if the Station area is redeveloped as part of the wider Oxford Central West.*
 - *Providing a focus for investment. If the station were to be built as part of Oxford Central West, this would provide a much sharper focus than just for the present site, for which funds for a new station have been sought unsuccessfully for a number of years.*
 - *Positively impacting on land values. There is relatively little land around the present station, as Frideswide Square is already built up, and, apart from the YHA, there are no plans to redevelop to the west of the existing station.*
- **To be deliverable**
 - *The constraints on the present station site have been noted above, limiting flexibility. A deliverability issue that is nowhere addressed is the disruption to east-west traffic and rail traffic that will be caused by the rebuilding and expansion of the Botley Road Bridge. No detailed cost estimate for the building/rebuilding work to achieve this appears to have been made, let alone the real cost of lengthened journeys during the works. The deepening and lengthening of the road tunnel below the railway, the roadway of which is below the neighbouring river level, is likely to be extremely expensive, and to require a large contingency.*
 - *To maintain reasonable road gradients on either side, the western end of Frideswide Square will need redesign, as will the current dangerous intersections to the west of the bridge between the Botley Road, Mill Street, Cripsey Road and Roger Dudman Way, where there have been fatal accidents. These need to be included in the SPD.*
 - *The expense of these works should lead to the consideration of alternatives, in particular the possibility of a Rapid Transit/cycleway/pedestrian bridge across the railway and river from the Osney Mead Estate and the retail area to the south of the Botley Road. Such a road would provide an alternative to the Botley Road when it is closed due to public or other works, greatly increase the quality of life for those living along it, and allow a guaranteed rapid access to the Westgate, avoiding the many pinch points along the Botley Road (Ferry Hinksey Road, Waitrose, access roads to the retail area and also the Seacourt Park & Ride). Partial funding should be available from the redevelopment of the Osney Mead Estate and the Oxpens.*

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• SPD Vision and Objectives

15. As will already be clear, we have a much wider vision for the station area, namely as one part of Oxford Central West. With the bus station located some 200 metres from the current station, we are unable to agree that this is a “fully integrated transport hub”:

- We agree that the station SPD should “be responsive to the surrounding developments”, though only as part of the wider Oxford Central West.
- Providing “architecturally significant buildings” around the current Station and Frideswide Square as a new townscape reference for the Station area will be difficult in view of the existing mixture of buildings.
- Providing a “cohesive public realm between the Station area and surrounding context” will be difficult when the SPD does not include the Hythe Bridge Street/Park End Street island site.
- Emphasising balanced east-west connectivity will reduce the north-south connectivity between the station and the bus station. The Botley Road already hinders connectivity.
- There are already active frontages on the north, east and west side of Frideswide Square. It seems unlikely that active frontages on Station Square (if this means shops) will enjoy much patronage, as this square is a cul-de-sac, and most people will be concentrating on the station. The use of Becket Street needs much more consideration: with a large bus station proposed, the number of buses using this street will be very high, leading to a noisy, polluted environment. If bus stops are to be located along Becket Street, it is essential that more space is provided for through traffic/buses than is the case in Frideswide Square, where buses regularly overrun the central reservation (and other fringes of the pedestrian areas).
- No detail is given of the “enhanced pedestrian and cycle infrastructure along Botley Road”, which presumably extends beyond the railway bridge, nor of “improvements to link north of Castle Mill stream, pedestrian bridge off Osney Lane”. It is also surprising that no alternative solutions for ramp access on the eastern side are provided, considering the illustrative details of other parts of the site. Much more thought needs to be given to bridges across the railway to the south of the station, in view of the forthcoming redevelopment of Osney Mead. We believe, as noted above, that a Rapid Transit/cycle/pedestrian bridge between the Oxpens and Osney Mead is much more practical, and will enjoy much more use than “the proposed bridge south of Oxpens connection with Osney Mead”. We can see no reason for the extra distance to be walked/cycled for a bridge to the south of the Oxpens.
- We agree with an appropriate mix of land-uses, but in the wider context of Oxford Central West. Such uses in practice will need to maximise the value.
- Obtaining the most “efficient use of land to maximise the contribution that can be secured from development” will be much easier in the wider Oxford Central West area. Current indications are that development on the Station site alone will be unable to secure a new station and public realm.
- We agree that maximising the potential for private investment will be key to a viable development, but that this is only likely to be possible in the wider Oxford Central West context.

4 SITE CHARACTERISTICS, CONSTRAINTS AND OPPORTUNITIES

4.1 SITE CONTEXT

16. The Said Business School is a strange choice (p.9) to announce “the unique academic character of the City”, as most visitors will have come to see the City’s mediaeval buildings which give it its unique character. It is noted that “the majority of the study area falls within Network Rail owned land (leased to First Group)”, though the YHA “sits on a strategically important piece of land previously owned by Network Rail” and “The land (or part of) is however key to enabling the a (*sic*) new western track and, potentially, for an entrance on this side”. However, the claimed short stay car park and the former parcel depot to the north of the Station building are no more, the land having been converted to bay Platforms 1 and 2 for Chiltern Rail and some local GWR services.

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We note (p.22) that the Oxpens SPD is currently being reviewed and updated, though this again needs to be done in the wider context of Oxford Central West. Those with limited mobility may question the statement that the Westgate development is “within walking distance of the station”. With the blank face of the development to Oxpens Road it is difficult to see any connection between the two, let alone a “strong connection”. Apart from comments on the improved provision for cyclists in Frideswide Square, no proposals are made about any improved or segregated provision for cyclists in the remainder of the area, despite the large number using it every day.

4.2 HERITAGE CONTEXT AND CHARACTER AREAS

17. We have no particular comments on these sections.

4.3 TRANSPORT AND ACCESS

18. Having acknowledged the extent of daily commuting into Oxford (though not the numbers – 45,000 or so) it is surprising that no mention is made of one of the County’s proposed measures to reduce congestion (and the current transport studies being undertaken to inform the Oxford Local Plan 2036): the Rapid Transit, and therefore of its possibilities for intermodal exchange with the railway. It should surely serve the Transport Hub.

19. Unfortunately the timescales for Phase 2 works at the station to accommodate more rail services are now out of date.

20. The problems of accommodating the large number of bus services in and through the City centre, turning some of the City’s most beautiful and busy streets into bus stations (High Street, St.Aldate’s etc.) are not mentioned. Having acknowledged the number of commuter trips by cycle, it is surprising that no attention is paid to the provision of cycle routes outside the immediate area of Frideswide’s Square.

4.4 LAND USE

21. This needs to be considered in the light of the wider Oxford Central West area.

4.5 CONSTRAINTS

22. We would agree with many of these. With cyclists being increasingly encouraged to take their machines on a train, some comment on accessibility to the transfer deck would be in order here.

4.6 OPPORTUNITIES

23. We believe that the Station Area development needs to respond not just to its immediate context, but to the wider opportunities offered by the Oxford Central West area. It is clear that providing a “fully integrated transport hub” will be difficult, if not impossible, within the area covered by the SPD – what is proposed falls far short of what is needed. The emphasis on the western gateway to the city will sound rather hollow after those approaching by road have inched their way along the Botley Road through its many pinch-points.

5 DESIGN PRINCIPLES

5.1 URBAN FORM, VIEWS AND ACCENT BUILDINGS

24. We agree that “the existing Oxford Station buildings and surrounding open spaces detract from the character of the City and provide a poor sense of arrival”, though Frideswide Square is an interesting open space. It is not clear how many of the existing buildings are to be redeveloped.

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The variety of styles (Jam Factory, Oxford Hotel and Said Business School) suggest that no limits should be put on those used in new buildings. The requirement for no blank facades along key frontages is surprising in view of the almost completely blank western façade of the Westgate. It is not clear what the reference to contributing to and complementing Oxford's architectural character and heritage means – the City contains significant modern buildings as well as the mediaeval college buildings.

5.2 SCALE AND MASSING

25. We agree with the Design Principles. However, this should not just concentrate upon building height, but also on massing – there are some unfortunate examples of large sheds on the Osney Mead Industrial Estate, and the student housing to the north of the station could have been designed more sensitively.

5.3 LAND USE MIX

26. This needs to be considered in the light of developments in the rest of the Oxford Central West area. It is strange to find a limit being suggested for the station and facilities, when the main reason for the SPD is to provide a larger station/transport hub. Some additional space should be provided for future-proofing to allow for changes in modal share of transport. Having commented earlier on the popularity of cycling in Oxford, this section should include considerations of the space required to provide for safe cycling

5.4 PUBLIC REALM AND AMENITY SPACE

27. The main part of this will remain Frideswide Square. We would agree that drop-off areas should not detract from this. However, a major factor that is not mentioned is the large number of buses that are planned to use the bus station in Becket Street. As in Castle Street/Norfolk Street in the Westgate, these will have a huge presence in the surrounding streets that is liable to detract from the public realm and dominate their perception of the area. This street is also part of the "Enhanced public realm: Pedestrian and cycle environments" shown on the map, though no details are given of what these enhancements might be in the text. Any detailed planning within the SPD area needs to include detailed considerations of the number of bus routes serving it, and the frequencies. Again the lack of any consideration of the proposed Rapid Transit is a significant omission.

5.5 ACCESS AND MOVEMENT

28. Reducing car parking will be difficult when significant provision is already made for residents. However, the main impact of cars is likely to be on vehicles passing through the area, and control of this number will require policies that are beyond the scope of the SPD. The map accompanying this section does not distinguish between routes for cars and buses (or Rapid Transit). It might have been expected that bus-only streets (or possibly bus lanes) would have been specified to provide more efficient public transport.

5.6 PEDESTRIAN AND CYCLING MOVEMENT

29. The main concern here seems to be cycle parking, the extra provision of which is welcome. However, nothing is said about preferred cycle routes (which should not be the same as bus routes if at all possible), other than the provision under the Botley Road bridge, nor about improving the poor provision for pedestrians along all of the routes into Frideswide Square. The use of "shared space" around the station is questionable when pedestrians' attention is likely to be on reaching the station or on trying to work out how to find the best route to their destination in the city, rather than looking out for cyclists. This applies also to Becket Street, with its busy bus traffic. The SPD

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should be aiming for Dutch-style convenient segregated provision for cyclists to get to and past the station as well as a large number of spaces and cycle parking, possibly with valeted, as at Breda.

5.7 BUS MOVEMENT AND INTERCHANGE

30. This is almost entirely about the layout of the bus station. The proposed number of between 15 and 24 stands suggests that little discussion has taken place with the bus companies. Again there is no consideration of the number of routes served or the frequencies and the impact of these upon the surrounding roads (including Frideswide Square) and without consideration of the proposed revised Oxpens Master Plan. The conflict between the requirements of buses and cyclists in the busy roads around the station is not mentioned, let alone any possible solutions.

5.8 CAR MOVEMENT

31. A fundamental discussion needs to take place about the extent to which longer term car parking is used at the station as compared to the more sustainable Park & Ride sites, which should all be connected by public transport to the transport hub. Parking charges may be important here, though the (unpaid) price of congestion on approach roads may play a major part. It would appear that the present long-term car park has become much less popular after the opening of Oxford Parkway station, suggesting that users are not prepared to endure congestion on the way in. The commitment to place "active modes" (cycling and walking) ahead of vehicular movement is welcomed, but more details are needed of the provision to be made.

5.9 TAXI MOVEMENT

32. No indication is given of how taxi parking provision and access will avoid conflict with pedestrian and cycle access in the station area, though the present system seems to work adequately.

5.10 SUSTAINABILITY

33. No problems here, but of course the whole object of an efficient transport hub is to make sustainable public transport and active modes as attractive as possible. It is unfortunate that the separation of the bus station from the rail station in the SPD is likely to reduce rather than enhance its sustainability in this respect. The absence of any reference to the proposed Rapid Transit system compounds this.

6 DEVELOPMENT COMPONENTS

34. For an SPD which is supposed to set the main scope of the area, these seem too prescriptive, particularly when several architects have already produced outline plans.

7 ILLUSTRATIVE MASTERPLAN

35. We refer to our earlier comments. However, it is surprising that some basic figures for the use of the station (passenger numbers) and the areas to be provided for the main uses of the station (thoroughfares for those arriving and departing on trains, ticket offices and machines and help points, meeting and greeting areas, retail areas, toilets, and contingency areas to allow for extra passengers and meters and greeters when trains are delayed) are not provided, together with provision for 30 (or more) years' growth in numbers.

36. The **indicative development schedule** provided appears solely to refer to provision of space, not to timing.

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37. The **Views and vistas** and the **arrival experience** are confined to architectural considerations. The general impression is of undistinguished concrete and glass boxes that will add nothing to the Oxford scene, and might come from anywhere.

38. The design principles seem to miss out the fundamental issue of how a quality development is to be secured, when there are many competing priorities for the railways other than providing 'high quality architectural responses'. One conclusion of the Oxford Civic Society /Academy of Urbanism event on Oxford Central West was the need to fund the station through commercial development alongside. So the proposal for a concourse like that proposed for HS2 at Euston is less relevant than Grenoble, Amersfoort or Freiburg which provide better models, as are shown on the leaflet that was produced following the OCS/AoU design charrette. There seems to be an acceptance in the drawings at least of the idea that buildings can be no higher than four stories. Surely options should be considered that maintain important sight lines, but that make it viable to develop the kind of gateway to Oxford that all would support?

8 PHASING

39. Details of phasing refer to building and demolition. While these may be "crucial in delivering a coherent vision and successful development of the station area" no details are given of the upset and inconvenience to road, rail and other users during the process. Delays and changes in Network Rail's plans for Control Periods 5 and 6 make the information given of limited use. We have noted above that no estimates are available for the rebuilding of Botley Road Bridge, and no funding is available to build a new station.

9 CONCLUSION

40. Recent developments have made the current SPD out of date. The station area should be incorporated into a much larger Masterplan that makes the most of the opportunities for commercial investment in development and provide transport and housing solutions that will relate to the whole of the Central Oxford West area, to provide the City with a new quarter that will be vibrant, successful, and a fitting gateway to 21st century Oxford.