



Draft West End and Osney Mead Supplementary Planning Document - Oxford Civic Society Comments

August 14th 2022

**Oxford City Council Consultation:
Draft West End and Osney Mead Supplementary Planning Document
Comments of the Oxford Civic Society**

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1. SUMMARY OF OCS COMMENTS

- **Our perspective**

It is understood that the West End and Osney Mead Supplementary Planning Document (WE&OM SPD) is needed because “Oxford’s West End is a fast - growing area with a number of key development sites coming forward in the short, medium and long term and it is important to consider how these will interact and how they will present an integrated, well-conceived design for a good extension to the city as a whole. Our comments focus on how well the draft SPD and associated Design Guide considers the interactions and provides guidance which will ensure an integrated and well-conceived design for the area.

- **Vision**

- The Vision is described in such general terms (e.g. ‘A Creative Place’) that it fails to inspire. Oxford needs and deserves better than this.

- **Spatial Framework**

- The WE&OM SPD should unambiguously integrate the West End and Osney Mead area into the city centre, a mere 5-10 minutes’ walk away.
- Different developments must not be designed in isolation from emerging city centre policies and relevant wider development policies. This is not just an ‘opportunity’. For example, with proximity to Carfax and the many retail outlets around it (including the Westgate Centre), will “good amenities (unspecified) and facilities” be viable? The city centre already has a surplus of retail facilities.
- The relative weights given to the golden threads underpinning the draft SPD need to be clear – in our view there should be equal weighting (i.e., for use in prioritising investments), and much more emphasis must be placed on achieving net zero.
- There needs to be guidance as to how the mix of housing vs employment will be established, and it should include the provision of lower-paid jobs and affordable housing across the WE&OM and city centre area.
- The proposals for connectivity are seriously inadequate, particularly to the city to the east, across the railway, by road vehicles, and around the station, and take no account of the potential impact of ‘Connecting Oxford’.
- No indication is given about how “a new and improved gateway to the city” as an improved transport hub based on the railway station will be achieved.
- No strategic movement corridors within and between Oxpens and Osney Mead are identifiable.

- **Core Strategies**

- The green infrastructure proposals are welcome as is the acknowledgement that the WE&OM area is watery, requiring blue strategic thinking.
- Better proposals for flood management and biodiversity are needed, in line with the Oxford Flood Alliance’s (OFA) prediction that Osney Mead will continue to flood even after the Oxford Flood Alleviation Scheme is built.
- We commend the intention to reduce vehicular dominance and reductions in car parking, though no details are given of how this will be achieved.
- It is vital that the West End’s development is integrated with the wider intention for the railway station to be a “key gateway”, not just an “opportunity” that may or may not be taken, and this must include provisions for public transport, which is not even mentioned.

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- Integration of the West End with the city centre requires improved pedestrian access, notably from the station and its surroundings, but this is not considered.
- There is no discussion of the application of Rapid Transit or cable car systems that have been proposed, now or in the future.
- **Transformational sites**
 - If the WE&OM SPD is to present an integrated, well-conceived design for a good extension to the city as a whole, the interactions of the key development sites as they come forward in the short, medium and long term need to be discussed and planned. The draft SPD does not do this
- **Implementation and delivery**
 - Scheduling of the implementation and delivery of the core and supporting strategies of the WE&OM SPD development, which should be phased with initial investments, enabling further investments and so on, is only vaguely presented. Measures to overcome the current shortfall in funding, including the key requirements identified on pp.104-105 of the Spatial Framework main report, are not discussed.
 - The Strategic Board to provide co-ordination and alignment across the key partners throughout the development and regeneration of the West End is welcomed. More involvement of the Stakeholder Group in the implementation of the SPD is likely to be helpful.
- **The Design Guide**
 - The proposed Design Guide, in its present form, will not produce a quality environment and good building design in the West End and Osney Mead.
 - This Design Guide needs to be shortened to make its positive contributions clearer, with a more succinct set of illustrated requirements/ rules that provide place specific, detailed parameters and criteria for a quality development of Oxford's West End.
 - The Design Guide should prepare codes that show how tall buildings required by the high density envisaged can be designed so that they are not big boxes, and have visual variety, do not overwhelm the streets and will contribute positively to the Oxford skyline and visual experience at ground level. We suggest that effort is concentrated on built form and streets.

2. KEY OCS COMMENTS

Please note: text in bold is the main OCS comment

2.1. Vision

1. The Vision incorporates the themes of ‘A Creative Place’, A Vibrant Community’, an ‘Accessible and Connected Place’ and a ‘Global Enterprise’, all being achieved sustainably. **This is not a Vision. A Vision might be based on these themes but it would explain how these themes interact to create a stimulating Vision that inspires.**

2.2. Spatial Framework

2.2.1. Scope

2. **Relationship to city centre - the whole area is within 5-10 minutes’ walk from Carfax. The WE&OM SPD should unambiguously integrate the West End and Osney Mead area into the city centre.** The draft does not make this integration clear. For example, a diagram on page 46 is entitled ‘draw West End closer to city centre’. It is more than that – it is already part of the city centre.

3. Para 10 of the Consultation Report states that there are significant opportunities and also significant infrastructure needed to fully realise them, requiring a holistic view of the whole West End and Osney Mead area. **It would be better to take a holistic view of the city centre which includes the West End and Osney Mead.**

4. Para 12 of the Consultation Report states that the SPD “offers the opportunity” to ensure that different developments are not designed in isolation and all contribute to the transformational benefits for the area that are part of the Vision. **It is also very important that different developments are not designed in isolation from emerging city centre policies and relevant wider development policies** (described well in the early – unnumbered- sections of Appendix A of the Main Report). For example, with proximity to Carfax and the many retail outlets around it (including the Westgate Centre), will “good amenities (unspecified) and facilities” be viable? The city centre already has a surplus of retail facilities.

2.2.2. Balance of the ‘golden threads’

5. The draft SPD acknowledges the climate change imperative through the Net Zero Oxford Action Plan. (Main Report, Appendix A, page 210) but **might also refer to the wider range of climate change policies and to the principles in the recently approved LTCP and others.¹ Bringing the draft WE&OM SPD more explicitly into line with this wider range of policies and draft policies might help to ensure that the draft SPD puts more weight into climate change.**

6. **Social policies – apart from ensuring inclusive policies (concerning employment, housing and connectivity especially), where is the analysis of the existing communities, e.g., in St. Thomas’s, where there is large recently-built inward-facing gated communities.**

7. Housing vs employment – **almost certainly the headlines concerning this draft SPD will focus on the mix of employment and housing in the area as a whole and in the city centre more generally. There needs to be a discussion in the Main Report text of how this mix can be established.**

¹ It is now unlikely that the WE&OM SPD will benefit from the Oxfordshire 2050 Plan, the preparation of which may have been discontinued.

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8. **The draft SPD, if approved in September / October 2022, may need to be revised in respect of employment and housing numbers as the Oxford Local Plan 2040 is prepared. This will be particularly difficult as it is now possible that the Oxfordshire Growth Needs Assessment will not be updated and the guidance expected from the Oxfordshire 2050 Plan (which was to identify the scale, pace and distribution of growth in Oxfordshire to 2050) will now not be available.**

9. Para 21 of the Consultation Report suggests that the city centre is a good place for creating high-value jobs, with sustainable transport links. No reason is given for this. It may “support the resilience of Oxford’s and Oxfordshire’s economy”, **but nothing is said about the number of lower-paid jobs that are necessary to support the higher-value jobs, or where the holders of the lower-paid jobs are going to live.**

10. **Evidence (para 23 of the Consultation Report) that Innovation Districts help to revitalise city centres “by encouraging entrepreneurship” should be referenced and what is the experience of other Innovation Districts?**

11. **Para 26 of the Consultation Report talks about “spaces for social interaction”. What are the plans for the “night time economy” centred on Hythe Bridge Street and Park End Street? How many such spaces already exist and how successful are they? Do they attract innovators?**

2.2.3. Connectivity

12. **Detailed connectivity proposals have been proposed within the area, but connectivity to the east (into the city centre) are not adequately considered and offer no advice to current considerations of the impact of ‘Connecting Oxford’ proposals.** The purpose of the SPD is to offer such advice / guidelines. It is possible that the SPD will be approved as policy before or at the same time as approval of ‘Connecting Oxford’ schemes.

13. **Vehicular access to Osney Mead along Ferry Hinksey Road needs more attention** – what controls are anticipated to reduce the impact on Botley Road of vehicles seeking access or egress?

14. Para 20 of the Consultation Report talks about major infrastructure investment at Oxford’s Railway Station, and a “new and improved gateway to the city. This investment will provide an improved public transport hub as part of the railway station development”. **Mention is made of “multi-modal improvements”, but they are not detailed. But there is no sign of any of this other than one new platform and a western entrance.** Worryingly the current draft Oxpens plans (the most recent made publicly available) do not make optimal use of the existence of the station at 5 minutes’ walk away.

15. **We have some concerns about the optimism surrounding the reopening the Cowley branch line to passengers to link large residential communities in south and east Oxford to central Oxford.** Will services be able to match current bus frequencies, and while the planned stations may be convenient for the relatively few who wish to travel to and from Oxford station to the two “innovation hubs”, they are not close to major housing estates². Do the catchment areas of the tentatively planned stations have development potential? Would this affect the analyses suggested above. The Cowley Branch line could be a valuable addition to our public transport framework, but we need more detailed justification to be sure.

² Would a car park at the Littlemore station become a new park and ride taking people into Oxford station?

16. **Para 27 of the Consultation Report states that the West End is strategically located on several movement corridors. This is not really the case for the Castle development, which has floundered, and is not the case for the Oxpens and, even more so, for Osney Mead; this is acknowledged to some extent in para 28 of the Consultation Report. How will movement corridors be encouraged?**

17. **The idea that providing a range of uses for the area will provide more footfall throughout the day and evening is questionable.** There is only a certain amount of such activity that people can afford (either financially or in terms of time spent), and the city centre is already showing the effects of inadequate footfall as more retail activity occurs on line. We feel that the green spaces in the area are not well connected and not delivering their full potential. If there ought to be a lot more people in the area then improvements and new green spaces seem to us to be very desirable

3. Strategies

3.1. Core Strategies

3.1.1. Green and Blue Strategies

18. Tree planting seems to be the main part of the green strategy. If the aim is to have mature trees this needs space for them to develop. A green strategy should ideally include local (community) responsibility for looking after the green areas. Community food growing could be a useful asset if on appropriate sites (i.e., flood plains). Nothing is said about minimising the area of land used for car parking instead of potential green areas (as in the gated communities mentioned above).

19. The Blue strategy refers to waterside development. Oxford is renowned for making poor use of its many kilometres of waterfront, so any improvement is welcome. **However, the Oxford Flood Alliance (OFA) notes that Osney Mead floods and will continue to do so even after the Oxford Flood Alleviation Scheme is built. How flood risk will be managed as plans come forward for redeveloping Osney Mead will need very close scrutiny. OFA believes the SPD should be strengthened in a number of areas to set an appropriate framework for managing potential future flood risk, including from sewers. We agree with OFA and refer to their consultation response³.**

20. **OFA also considers that the approach to biodiversity needs strengthening in line with the approaches adopted by the Oxford Flood Alleviation Scheme:**

- The design document talks about ‘sensitivity to habitat’ and of retaining ‘existing trees where possible, especially those of good ecological and amenity value.’ A glance at Google Earth shows the two main areas of tree cover on Osney Mead are along the bank of Osney Stream opposite the houses in Bridge Street extension, and along the towpath south of Osney Lock down to the railway bridge. The SPD seems to envisage the elimination of all of these trees. This is a major contradiction in the documents. Removing them would take out most of the existing habitat.
- Green roofs need regular maintenance including irrigation and addition of fertiliser. **There are some positive words in the design guideline but protecting and enhancing existing biodiversity in the area, including incorporating wild, unmanaged space into the design, hasn’t been adequately thought through.**

³ Please see Appendix 1

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- **Continuing to allow the river frontage to operate as natural floodplain as it does currently, with the trees and other wild vegetation retained, would be less environmentally destructive and cheaper to maintain.**

21. **The SPD should include explicit references to the Oxford Flood alleviation Scheme (OFAS) and its environmental vision, and alignment with this should be a requirement of any developments coming forward.** The OFAS project covers an area which borders Osney Mead and includes important targets for new wild flower meadows in the area. Opening access into the greenbelt from Osney Mead must not compromise the biodiversity targets OFAS is committed to delivering.

22. Along with Friends of the Earth we suggest that new green and blue infrastructure should be treated as if it was a new park and therefore and should have a clear management and maintenance team.

3.1.2. Movement Strategy

23. **Para 54 of the Consultation Report talks about the overarching aim of reducing vehicular dominance and supporting car-free developments and reductions in car parking at key sites, which is to be commended. Again, the integration of the West End's development with the wider aspirations for the railway station as a key gateway is merely described as an "opportunity", rather than a key requirement. Capitalising on this refers only to onward journeys by foot or cycle, with no mention of public transport, which surely must be a key requirement for a "key gateway" into the city.** There is no mention of any Rapid Transit system. OCS recognised the interest expressed by cable car developers in a cable car from Redbridge Park and Ride to Oxpens and is disappointed that the interest has not been refined into a proposal with a sound business case. Given the speed with which the Osney Mead / Oxpens bridge proposal is being finalised (with funding available but with a tight deadline) and that a hybrid planning application for the Oxpens development is expected before the end of the year, this perhaps is a lost opportunity. Innovative ideas like this should be assessed in detail in the EWE&OM SPD as other opportunities may arise.

24. The proposed bridge from Osney Mead to Oxpens / Oxpens Road does not provide good connectivity, and a more direct alternative across the river and railway would have been preferable e.g., as indicated in Figure 10, page 30 of the SPD) and also providing the desired connection with the station / transport hub. However, the proposal for the bridge in a location just downstream of the existing operational railway bridge is near to finalisation as funding for the bridge will be lost if construction is not completed within 2023. This kind of problem – infrastructure being funded and implemented without synchronisation with the developments it serves and without time for adequate assessments of alternative routes is not uncommon.

3.1.3. Public realm strategy

25. Para 68 of the Consultation Report emphasises the importance of connectivity (especially East-West), and we support it strongly, including from Osney Mead to the city centre. The list of 'key infrastructure priorities' in para 69 of the Consultation Report is very important, though those around the station are very expensive.

26. **There is little in this strategy - despite frequent references to integrating the West End with the city centre - about how pedestrian access to the city centre from the area around the station is to be improved. While there may be 'Public realm improvements to' Park End and Hythe Bridge Sts.**

the area to the east is not considered. Pavements on New Rd are very narrow and used as bus stops; pavements on Hythe Bridge St. at the canal are also narrow and frequently overcrowded and unsafe. Public realm improvements should be linked to improvements between George St., Westgate and the West End.

3.2. Supporting strategies

- **Heritage Strategy**

27. This concentrates on the relatively few assets in the area, but should also consider the overall heritage of the city, which is unique in the number of different and operating heritage assets in the central area. At present it appears to be open to developers to introduce changes on sites within the central heritage area that are not individually registered as assets.

28. There should be more reference to the history of the West End – which developed as a place to live and work and to some extent play. **West Oxford and St. Thomas’s have played roles in City and University life and although often neglected its regeneration, it could provide lessons, including tenure mix, for the continuing change in the area.**

29. **The Design Guide study also neglects to refer to Park End and Hythe Bridge Streets as well as the Canal Basin, yet includes Speedwell Street.** The former are surely part of the West End and critical to the connectivity and movement in and out of the City.

- **Arts and cultural strategy**

30. **The list of possible uses in Para 74 of the Consultation Report is all-embracing, and one doubts whether there will be room for all of them. The city centre already hosts a range of cultural features.** Several questions emerge:

- Do these need to be added to?
- Is it proposed to relocate some of them to the West End, if so, which?
- Successful cultural features need good public access – this means good public and active transport access.
- Would the City benefit from dispersal of a wider range of cultural features outside the centre? More should be made of the multicultural region along the Cowley Road, perhaps?

- **Meanwhile uses**

31. Reference is made in para 80 of the Consultation Report of vacant and under-used spaces. **If one asks why this is so in a city which is supposed to be short of space, one major factor must be poor accessibility by public and active travel, as acknowledged in para 85 of the Consultation Report. The planning of roads and better access needs therefore to be at the head of development work.**

- **Building heights**

32. Architects seem to be fixated on ‘blocks’ as a fundamental design feature. **Courtyard blocks do not contribute to sustainability if the courtyards are paved with tarmac and cars, and they tend to remove activity at street level (see e.g., Westgate). Where are the curves that add so much to the urban landscape (think High Street, St.Aldate’s)?** A draft massing model for the Oxpens was criticised for providing lots of boxes, when it is the spires and domes that have created the iconic skyline of Oxford (a re-design is awaited).

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33. Paras 96 and 97 of the Consultation Report rightly refer to Oxford's iconic skyline, though one should not forget the effect from ground level. **In discussing roofs (para 97) the use for PV power generation is ignored, and this could be increased if designs maximised the area of south-facing roofs.**

34. There is nothing about car parking: **"There is an aspiration (p.117) that since developments need to be car-free, re-provided parking "at non-residential developments" should be sought "where there is good accessibility to a range of facilities". There is no recommendation of locations that might support the feasibility of this, presumably as it is not considered to be within the remit of a localised planning document.** One may presume from this that these 'non-residential developments' lie outside the SPD area. It may be deduced that the displaced parking is not envisaged as being within the city centre: "any re-provided car parking should first and foremost be considered in the context of Oxford's net zero ambitions" (p.113).

- **New development and land use**

35. **While there is a lot about providing more housing, it is not clear what the balance between housing and jobs will be:** the latter appeared to take precedence in draft Oxpens developers' plans, which will exacerbate the commuting/transport problem. Housing which becomes part of London's commuter suburbs will not help solve the City's problems.

4. Transformational sites

36. Para 112 of the Consultation Report lists Osney Mead. Oxpens the Frideswide Square and Castle Mill Gateway and Station Gateway as transformational sites. These are dealt with separately.

4.1. Osney Mead

37. Osney Mead: this refers (Para 114) to building upon existing access routes. **Is the proposed Osney Mead / Oxpens pedestrian / cycle bridge adequate (no demand assessments for pedestrian / cycle / vehicular movement have been provided) or will Osney Mead remain the backwater it currently is.**

38. **There is a worrying statement about 'the most efficient use of land' (Para 115), which suggests that a more open and attractive design than a built-up city block will not be recommended.** Development across the site in one go could result in a significant addition to Oxford's architectural heritage.

4.2. Frideswide Square and Castle Mill Stream

39. Development refers to mixed uses, but makes no reference to the existing experience: a transport hub; some residual restaurant/café and small retail establishments in Frideswide Square, probably as an adjunct to the hub; a night-time clubbing area; a public area in front of the Business School much used by skateboarders. **Is it intended to retain these, and what could be added when the city centre is 5 minutes' walk away?**

40. **The section on movement is minimal, yet this is a key gateway to the city (reference is merely made to enhancing it, but not how). It needs to be part of a key overhaul of the City's transport system, e.g., one-way active travel and public transport eastbound along Hythe Bridge Street/etc, and westbound along Park End Street/etc, connecting with the City's main travel hub, based around the station.**

4.3. Oxpens

41. **Para 125 of the Consultation Report correctly refers to its important relationship with Osney Mead, the Station and the City's core area. It also refers to the need to improve east-west movement across the railway but fails to say how these should be done.**

4.4. The Station Gateway

42. **Para 128 of the Consultation Report reiterates the, largely incompatible, requirements for the Station Gateway, but does in Para 129 acknowledged the huge problems.** The need for a strong sense of arrival and a multi-modal hub are mentioned in Para 131, but not how they might be achieved, despite this supposedly being a planning document for the area. Considering the difficulties is doing this in such a constrained area, the inclusion of a separate requirement for a 'mixed-use precinct' seems strange. **The detailed design of the station will need to consider how far it can become a station for passengers and a transport hub (the main function for rail stations in e.g., the Netherlands), while allowing for some retail.**

5. Implementation and delivery

5.1. Emerging policy context and masterplans

43. Ideally, implementation and delivery of the core and supporting strategies of the West End and Osney Mead development would be phased with initial investments enabling further investments which enable further investments and so on. **But the scheduling of the readiness of key sites is vague, especially funding readiness (the station development for example).**

44. **Some investments could be ready with finance and for implementation but are ahead of the design and readiness of other components with which they are functionally linked** (the almost design ready and funded Osney Mead / Oxpens cycle / pedestrian bridge and the less design and funding ready Oxpens for example). **This could lead to poor design and functionality which would not achieve the objective of a very high standard of development.**

5.2. Funding requirements and financing plan

45. Key funding requirements for the Spatial Framework are identified on pages 104/105 of the Spatial Framework main report (with an extended version in the Executive Summary). **The investment requirement for key delivery priorities ranges from £735m to £1,161m (the station requirement being about half of this).** Some of this is funded, and some partially funded, but **most is not yet funded.** The report does not discuss measures to overcome the shortfall in funding for key delivery priorities.

46. The key priorities identified in the draft SPD are generally in line with the priority funding requirements of the Oxford Economic Strategy⁴. The Stage 1 Oxford Infrastructure Strategy Report identifies the (OIP20) West End's Global Innovation District's infrastructure costs at £1.53bn

⁴ The successful delivery of the Oxford Economic Strategy is predicated on more efficient, sustainable movement of people and goods. Without the following five investments it is considered that the inclusive, global economy and zero carbon ambitions of the Oxford Economic Strategy could be compromised: investment in a new station for Oxford; investment in the Cowley Branch line extension; connecting Oxford: to reduce congestion, free up essential movement for the economy and allow for re-prioritisation of road space; improved bus provision, information and infrastructure, to better connect people to jobs; major investment in active travel modes, to mobilise a greener workforce

(innovation hubs and labs). **The report notes that of this £1.48bn is yet to be raised, and that some funding may be available from loan funding secured by the provided revenue generating business opportunities.** The station is also mentioned in the Oxford Infrastructure Strategy Report (ORC1) (additional through platform and associated line capacity upgrades at £675m). It is noted that the delivery partners are the DfT and Network Rail, with central government responsibility for funding.

47. **This section of the consultation document is very weak. In designing an innovation district, it might be appropriate to identify innovative financing!** It is already 14 years since the West End Area Action Plan was approved and although we have achieved a great deal in reaching stakeholder agreements on conceptualising the West End / Osney Mead area and beginning the process of assembling land ownerships and agreements, the pace has not been hot. **To accelerate the West End and Osney Mead development process and to obtain the benefits of the development sooner rather than later traditional and innovative sources of funding need to be explored⁵.**

48. **The Oxfordshire Infrastructure Strategy (Stage 1) multi-criteria scheme appraisal does not prioritise the investments considered to be a priority (other than the station) in the draft West End and Osney Mead draft SPD. This may constrain financing?**

5.3. Implementation governance

49. **The Strategic Board to provide co-ordination and alignment across the key partners throughout the development and regeneration of the West End is welcomed.** It is agreed that leadership and coordination are critical to successful implementation and delivery, and the ability to optimise potential through future decision-making as projects and phases are delivered. It is noted that the Board includes senior representatives from OxLEP, Oxford City Council, Oxfordshire County Council, Nuffield College, Christ Church, University of Oxford, Network Rail, the Department for Levelling Up, Housing and Communities and the Department for Transport, with the anticipation that other central Government departments could join, as required.

50. The Stakeholder Group and Landowner Group (described in Appendix B: Engagement of the Main Report) are noted. **The Stakeholder Group participated in early consultations but there has been little communication since then. More participation by this Group and members of this Group as the implementation of the SPD continues could be helpful.**

6. The Design Guide

6.1. Summary

51. **Will this Design Guide, in its present form, produce a quality environment and good building design in the West End and Osney Mead?** How does it differ from, yet compliment other local authority documents? This Design Guide is far too long. Its excessive wording and repetition obscure the positive contribution within it.

52. **Would a more succinct set of illustrated requirements/ rules that provide place specific, detailed parameters and criteria for a quality development of Oxford's West End be more useable and useful?** What we have, with the Local Plan, the Supplementary Planning Document and the West End Spatial Framework, plus a mountain of other documents, is information overload which is a daunting prospect for any developer, architect and urban designer.

⁵ Chapter 8 of the Oxfordshire Infrastructure Strategy (Stage 1) is helpful.

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53. As noted earlier we are left with the impression that the Design Guide seems to think that “big box” buildings are inevitable. Surely the purpose of the Design Guide should be to prepare codes that show how tall buildings required by the high density envisaged can be designed so that they have visual variety, do not overwhelm the streets and are not big boxes.

54. Much editing is required. For example, the descriptive narrative and general policy statements, except of course for references, where appropriate, should be omitted. A glance at the SPD and Local Plan shows that there is sufficient historical background and description of the area with details of policy to inform developers of the outcome expected from their proposals. It is recommended that the Design Guide concentrates its effort on built form and streets. Rationale should be given for the connectivity and built environment for each area so that designs can be measured for effectiveness. Thereby a proper extension to the city and a safe, visually delightful place to live in, work in and visit is more likely to be achieved.

6.2. Context

55. The guide is based on the National Design Guide of 2019 and takes its “Ten Characteristics of well-designed places” from it: (i) Resources (efficient & resilient); (ii) Lifespan (built to last); (iii) Context (enhancing the surroundings); (iv) Identity (attractiveness and identity); (v) Built Form (a coherent development); (vi) Movement (connectivity and permeability); (vii) Nature (enhanced and optimised); (viii) Public Spaces (Safe and inclusive); (ix) Uses (mixed and integrated); and (x) Homes and Buildings (healthy and sustainable). **We would put emphasis on nos. (ix) and (vi).**

56. **We would also put more emphasis on achieving a net zero city and economy. This development needs to play a lead role in delivering that commitment. This can be done by setting clear statements in the SPD that all new developments should be zero carbon in construction and operation. The SPD will play a key role in developing the commitments in the Local Plan – as that Plan is reviewed so it is likely that so those climate-related commitments will also progress.**

57. It is of some concern that the section on climate and carbon only comes in on page 41 of a 46-page Guide. The first of the ‘Ten Characteristics of Well-Designed Places’ referred to above is that they should be Efficient and Resilient. Yet this is ignored in the ‘four overarching themes’ set out three pages later. **Statements in the Design Guide about 'low energy' and 'ultra-low energy' are inadequate to the zero-carbon challenge as is the idea that "new development is expected to ... reduce carbon emissions”.**

58. **The idea that "by 2030 only net zero development applications will be accepted" allows for eight years of delay and poor performance. There are no outstanding or insuperable technical reasons why this development should not become a national exemplar of good zero carbon performance. This Design Guide should have Zero Carbon ‘front and centre’ and not as an afterthought.**

59. The current Local Plan of 2036 provides overarching policy guidance and informs the approach of the Design Guide. The Design Guide is defined by Policy AOC1 of the Local Plan in the context of Osney, St. Ebbes, University Quarter, surrounding Green Belt and water courses. It is the intention that it must be used to inform the design of the development to ensure that designs are of the “highest quality” and policy compliant. A collaborative approach is encouraged between Council and Applicant to ensure adherence to the Design Guide so that there is “little need for major alterations following submission”.

60. Whilst the aims of collaboration are to be applauded it is unclear how quality is defined, assessed or enforced. Given that there is a history of diluting approved schemes by builders, we would have liked to have seen stronger language used for requirement for outcomes not just designs to be of the highest quality and Applicants should be required not merely encouraged to take a collaborative approach.

6.3. West end areas and analysis of their character

61. The West End has been treated under the following headings: (i) Osney Mead Industrial Estate; (ii) Osney; (iii) Station Gateway; (iv) Oxpens; (v) Oxpens College and Residential; (vi) Administration Quarter. Their condition, character, opportunities and constraints are described. This section is well written and takes much from existing documentation which also appears elsewhere in the Local Plan and the SPD and as such is well known and will not be discussed in any great detail here.

62. The Design Guide chooses to select four areas for discussion under the heading Areas of Changing Character. (i) Station; (ii) Oxpens and College; (iii) Speedwell St.; and (iv) Osney Mead. The in-word for Oxford is “gateway” and is thrown around in the draft WE&OM SPD and Design Guide. We cannot see how Oxford Station is a gateway or how it can become one even with the collaboration and commitment for wider change by various agencies such as the Network Rail, the county council and central government. **Whilst it is interesting to see the plans for the station emerging, there is little to encourage one to believe that it will be part of a wider integrated approach to changing the face of the Botley Road and rail tracks at this entrance into Oxford as well as buying into the vision for a “world class multi - mode transport hub.” From this point of view, it is disappointing that the WE&OM SPD and associated Design Guide have not made a disinterested and imaginative guide for this part of West Oxford. Merely suggesting that there is “a huge opportunity to make it a gateway” is not at all helpful.**

63. There is much to agree in this section particularly the critique of the areas. Guiding principles, which generally are welcome, run through the above. We have interpreted them as follows: - the creation of significant architecture and quality public realm, ground floor uses and frontages which will provide active/transparent/connecting Design Guides for a safe and welcoming public realm. However, principles could be made more succinct in the text to convince a developer of their relevance to a successful outcome.

6.4. Movement

64. It is not possible to disagree with the statement **“A strong movement network is pivotal to the future of the West End. Connectivity and permeability, with appropriate street hierarchy determining the scale of development, are at the heart of the Design Guide.” But does the WE&OM SPD provide a strong movement network?**

65. Oxpens and Botley Roads are considered as Primary Routes and “allow for significant vehicular flow. They should have an environment suitable for walking and cycling. Widths of carriageways, cycle and footways should follow best practice.” How also a visually attractive experience might be achieved would be helpful, although reference is made to “traffic calming measures with integrated planting strategies, active edges and designated cycle lanes” as well as various publications on cycling, walking and carriageway standards.

66. Secondary Routes “will form the majority of routes that (local?) people will use between and through the various sites.” Here walking and cycling should have priority with widths of streets such

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as to allow vehicles to pass stationary service vehicles. The view is taken that there should be “safe, green and accessible interface between buildings and life on the streets” and this is welcomed.

67. Tertiary Routes “will have a more intimate feel” and should promote a car-free environment with “school streets and play on the way.” Delivery and servicing should be met “without creating negative impact”. Consideration should be given to “consolidate deliveries and for last mile deliveries on bike.” Service Yards are suggested to accommodate delivery by large vehicles and those with a longer wait time. In low traffic areas delivery could be at the door at loading bays which could also serve as footways.

68. **The description of the hierarchy is all well and good, but we doubt that it provides a strong movement network especially as the site contains the main railway station and is ‘gateway.’ For example, can the primary routes along Oxpens and Botley Road and the secondary routes as identified adequately connect the city centre to the station and can the major housing and employment areas adequately connect to the station and to the city centre?**

69. **What will be the impact of Connecting Oxford and especially the traffic filters on the Oxpens primary route? What will be the impact of the development of the Osney Mead industrial area on Ferry Hinksey Road and it’s junction with the Botley Road. How adequate will be the proposed Osney Mead / Oxpens pedestrian and cycle bridge to accommodate the demand (which is not yet specified)?**

6.5. Public realm

70. The following spaces are used to consider aspects of the public realm in the West End: (i) gateway; (ii) plazas; (iii) interstitial; parks; (iv) pocket parks/squares and riverside edge. Helpful characteristics and illustrations of each are given. Unfortunately, streets, which are part of the public realm are not discussed.

71. Eight principles are put forward including: (i) Scale and orientation; (ii) active frontages and multiple uses to promote a variety of activities at various times; (iii) signage for way-finding which are appropriate in emerging development and in my view crucial to identity, distinctiveness, variety and can be achieved with focal points and landmarks; (iv) materials of high quality to ensure long life and distinctiveness. Common threads are pedestrian and cyclist friendliness should be maximised and Greening of streets to build climate resilience.

6.6. Nature

72. We suggest an objective such as: Make the West End resilient to climate change and enhance well-being and biodiversity and then.... “Good design must integrate nature with urban environments to maximise positive qualities of both” by for example maximising areas for planting such as roofs and balconies.

73. The Design Guide suggests the waterways “hold great ecological value running through the site and green belt beyond”. These are key assets it is suggested and offer “huge opportunities to transform the run-down areas of Osney”. Flood mitigation will be an important consideration and a “green approach” with appropriate planting and SUD’s should be considered. Urban farming is suggested as a way of drawing people close to nature and give an understanding of food production as well as initiating sustainable methods of food growing. Tree planting is suggested as a way of

providing effective “green” streets. **There is nothing to object to here, except that we need more explanation of how it can be achieved.**

6.7. Built form

74. The Design Guide discusses built form under the headings: (i) Height; (ii) Density; (iii) Street Frontages; (iv) Roofscape; (v) Affordability and Tenure Mix; (vi) Residential Amenity Space. Our comments are as follows:

75. **We would like to see achieving net zero to be the driver of the section on built form.** Instead, the Design Guide begins “Given the importance of Oxford’s sky line the Council’s policy on building height must be followed”, we suggest that there should be all sorts of caveats here to avoid “a reach for the Maximum Height” approach throughout the sites by developers. Again, under the heading Height the Design Guide states that “The West End offers several opportunities for sensitive yet statement moments of built height to add freshness to Oxford’s dreaming spires.” The examples given for how this might be achieved are dull. **Tall buildings in themselves are not necessarily bad. We do agree that “key strategically chosen moments of height within Osney Mead (and elsewhere?) may help to signify it as a vibrant, mixed-use neighbourhood”. We would rephrase this as “significant landmarks to give the place visual variety and legibility”.**

76. The animated, broken skyline of Oxford is a key characteristic of the place. It gives the city its distinctiveness. Such a characteristic should be in a designer’s vocabulary in any case, we suggest, and is appropriate particularly in large-scale high-density developments such as that envisaged here.

77. We disagree with the statement that “skyline impact will require in-depth technical guidance from heritage experts.” This is the job of the developer’s Architect. The statement should be removed from the Design Guide or rewritten.

78. **Under Massing the Design Guide notes that “the Local Plan envisions high density urban living in Osney and the West End that makes efficient use of land ... and a range of densities, design approaches and urban typologies will need to be considered”. Further detail and appropriate examples to tease out design principles for achieving a good place with high density would be helpful.** We dislike the term “block” when it is not defined or there is no discussion about its use with good examples and dimensions. **The examples given are poor and should be revisited.**

79. The Design Guide states that the wide range of viable and compatible uses needed in the area can be mixed together in a building”. This is interesting and a diagram illustrates how this might be achieved. **A 3D illustration would be helpful to demonstrate how tall buildings can be designed without overwhelming the public realm.** Fortunately, the Design Guide suggests that where there is such a mix residential entrances should be integrated into commercial frontages and by making internal uses visible to the public, interest and safety will more likely be assured. **Design elements of verticality, proportion, façade articulation, visual, variety should be explored in the Design Guide.**

80. It would be helpful if roofscape were defined in the context of the city of Oxford where roofscape has a significant impact on the townscape. **The Design Guide assumes that roofs in the West End development will be flat. In doing so this is a self-fulfilling objective for designers yet should not necessarily be so. Whilst greening is supportive of biodiversity and should be encouraged, the use of rooftops for energy seems to have been overlooked. Also overlooked is the opportunity to create buildings which have articulated massing by a variety of roof form.**

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81. One cannot disagree that on affordability and tenure mix that the design should be “tenure blind” (as for example at Barton). It would be helpful to hear how the housing will be brought within the budget of key workers.

Appendix 1 – OFA comments on the draft West End and Osney Mead SPD

OFA has submitted the following comments to the City Council:

a) Flooding and flood risk - the documents acknowledge that Osney Mead floods and will continue to do so after the completion of the Oxford Flood Alleviation Scheme, and that any development there needs to create capacity to contain and manage flood water. This can only be done, the documents say, if the whole Osney Mead site is developed in a joined-up way. The documents also recommend that creation of the appropriate infrastructure before any other development. We strongly support this view. Management of flood risk needs to be taken very seriously in any plans which come forward, not just for Osney Mead itself but also for adjoining areas. There is a risk that piecemeal re-development of the site could increase flooding locally and it would be challenging to monitor and manage.

While we welcome the general statements made about flood risk, we do not see how some of the descriptions and images of proposed redevelopment on Osney Mead are consistent with flooding of the area. We therefore have serious questions about how well flood risk has been understood by the authors of these documents. In particular, the documents talk about 'activating' the riverbank south of Osney Lock and down to Grandpont. The proposals envisage a new, wider cycle and pedestrian route along here, river-facing buildings (apartments, offices) and new spaces for people to sit. The illustrations of what this might look like show a heavily urbanised and landscaped river frontage with paths and building all at the same level. But the towpath floods most years and is often impassable. This is flood zone 3b, part of the natural flood plain, and the types of development permitted in such an area by the National Planning Policy Framework are very restricted.

How can the envisaged 'activated' frontage as illustrated in these documents possibly be realised in these circumstances? Will the bank be raised to create the kind of structures shown in the SPD? If so what happens to flood water which currently overtops the Thames banks and inundates adjacent areas? Canalising the Thames at this point would create significant flood risk for existing communities both up and downstream of the area. Or will the riverside path remain at existing levels and be allowed to flood? This is very unclear in the documents. We would like to see explicit statements in the SPD and design guidelines about the challenge of 'activating' the riverbank given that it is in flood zone 3b. Illustrations in the documents should also present a more realistic view of what the redevelopment might look like.

The design guidelines talk about new bridges connecting the towpath by the Punter to Barret St on the other side of the Thames, and one at the eastern end of South St crossing the Osney Stream to connect to Osney Mead. In both of these locations temporary flood barriers are currently deployed when river levels are high. These barriers are critical to preventing houses on Osney Island from flooding. At the end of South St there is a large wall where the proposed new bridge would come across. This wall helps to contain flood water in Osney Stream. The demountable flood defences for the island are stored in the EA's Osney depot. If this depot is to close and move, we need to understand how flood defences will be deployed during a flood emergency. A large pump located on EA land behind the houses on the eastern end of South St is also a critical part of the local flood defence system. This pump evacuates flood water from the island and pumps it into the weir pool. Even after the completion of OFAS houses on Osney will continue to be vulnerable to flooding and temporary defences will still be required. We would like to see the SPD/design guidelines explicitly state that any developments must not compromise flood defences for Osney Island.

A holistic approach to redeveloping Osney Mead potentially creates an opportunity to help reduce flood risk to Osney Island as well as addressing the challenges of the Osney Mead site itself. We would like to see the SPD flag up this opportunity as something to be explored. We have a rare opportunity to reduce risk for vulnerable Osney residents and this should not be missed.

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Redevelopment of the Castle Mill area could potentially affect streams and weirs in that section of the city. Any plans coming forward should ensure there is no reduction in the capacity of these streams to help move flood water through the city. Could the performance of these water courses be improved to help alleviate flood risk in the city? Has this been considered?

b) Sewers - the current sewer system on Osney Mead does not cope with floods and is quickly infiltrated by flood water. Sewage is pumped from Osney Mead up Bridge St on Osney Island to join the main sewer on Botley Rd. In a flood the pressure in the system means sewage bubbles out of the sewer covers and has to be pumped into the river. Some people on Osney Island cannot use their toilets during a flood. We raised this issue in a previous consultation but there is no mention of sewer infrastructure in the Supplementary Planning Document or the Design Guidelines issued for consultation.

We need assurances that adequate sewer infrastructure will be put in place and this must be a prerequisite for any redevelopment of Osney Mead. The increased density of proposed redevelopment will greatly increase pressure on the sewer system. Failure to address this infrastructure requirement could be disastrous for some Osney residents and would mean regular discharges of sewage into the local water ways to the detriment of the wildlife. When we have tried to raise these issues with Thames Water in the past they simply say 'it's caused by fluvial flooding which is nothing to do with us'. We know what an appalling track record the water companies have on river pollution. A holistic approach to the redevelopment of Osney Mead must include addressing the sewerage problems, including using flood mitigation measures to reduce risk of sewers being infiltrated.

c) Biodiversity – throughout the development of the Oxford Flood Alleviation Scheme we have been strong supporters of the 'environmental vision' of the scheme and the idea of making the new stream as natural as possible. This helps reduce long-term maintenance of the assets being created and is far more sustainable than a more engineered approach. We believe a similar approach should be adopted for Osney Mead. The design document talks about 'sensitivity to habitat' and of retaining 'existing trees where possible, especially those of good ecological and amenity value.' A glance at Google Earth shows the two main areas of tree cover on Osney Mead are along the bank of Osney Stream opposite the houses in Bridge Street extension, and along the towpath south of Osney Lock down to the railway bridge. The SPD seems to envisage the elimination of all of these trees. This is a major contradiction in the documents. Removing them would take out most of the existing habitat.

There is a considerable difference between the carefully thought through strategies in OFAS for how biodiversity will be enhanced through the project, and the vague reliance on street trees and green roofs in the SPD design document. Green roofs need regular maintenance including irrigation and addition of fertiliser. There are some positive words in the design guideline but protecting and enhancing existing biodiversity in the area, including incorporating wild, unmanaged space into the design, hasn't been adequately thought through. Continuing to allow the river frontage to operate as natural floodplain as it does currently, with the trees and other wild vegetation retained, would be less environmentally destructive and cheaper to maintain. We would like to see approaches here better aligned with OFAS's approach to enhancing biodiversity.

The SPD should include explicit references to OFAS and its environmental vision, and alignment with this should be a requirement of any developments coming forward. The OFAS project covers an area which borders Osney Mead and includes important targets for new wild flower meadows in the area. Opening access into the greenbelt from Osney Mead must not compromise the biodiversity targets OFAS is committed to delivering.

OCS 14/08/22