

Appendix 2: Summary of Public Consultation

In line with the requirements of the City Council's Statement of Community Involvement SPD extensive consultation and engagement has been undertaken in respect of the Westgate proposals, both prior to and subsequent to the submission of the planning application. The text which follows considers the public consultation undertaken under 3 headings:

- consultation undertaken by the applicant;
- consultation undertaken by the City Council on receipt of the planning application; and
- additional consultation undertaken by the City Council on receipt of amendments to the planning application.

Consultation Undertaken by Applicant.

Publicity by the WOA commenced in June 2013 relating to a series of consultation and stakeholder events which were to follow, including a stakeholder preview event, two public consultation exhibitions within the Westgate Centre in June and October 2013, four roving exhibitions events. A leaflet drop to 1500 city centre residents and businesses advised of the various consultation events, with further publicity given by:

- distribution of 3500 leaflets at central shopping streets, railway station, bus station and Westgate Shopping Centre;
- invitations to 54 local stakeholders and local councillors advising of preview and other events;
- 6 days of advertisements in Oxford Mail on consecutive days;
- posters erected advertising exhibition events;
- editorial coverage in local newspapers; and
- establishment of dedicated website, contact email address and Freephone number.

The WOA report that some 1209 people attended their June 2013 exhibition with 228 responses received made up of 133 completed questionnaires; 90 responses via the website and 5 email returns. Post permission WOA indicate a further 34 responses had been received up to mid January 2014. Of the written responses received in the pre application phase, 71% indicated they thought the city centre would benefit from the proposals with 21% indicating it would not be good for Oxford. Issues raised centred on traffic and access; public transport, cycle provision, design and appearance, and retail and tenants considerations. Overall the various consultation exercises gave rise to the responses relating to the following:

- importance of integrating public transport system;
- coordination of development with other development projects;
- improved public pedestrian routes;
- concerns about traffic impacts;
- better cycle facilities including routes and cycle hub;
- better / affordable parking provision;
- environmental impacts from rerouted bus services;
- design considerations;

- additional housing;
- inclusion of independent retailers;
- more fashion retailers welcomed;
- concern about flooding issues;
- more green space desirable;
- impact on existing retailers; and
- need for sustainable development.

Consultation Undertaken by City Council on Submitted Planning Application.

Statutory Organisations.

- English Heritage: Possible breach of Carfax height should be reduced - long stretches would exceed height with bulky roofs; possible reflective roof materials; positive elements such as tower feature to northern end acceptable; surviving remains of Franciscan Friary equivalent to Scheduled Monument status; welcome Turn Again Lane turning towards Castle site; regretted that southern part of northern block gated at night; new building to castle Street should be given space to be distinguished; Middle square to be permanently accessible; frontage to castle street disappointing; South Square should not be roofed; should enhance (few) adjacent historic buildings.
- Thames Valley Police Crime Prevention Officer: Do not wish to object; commend applicant for incorporating reference to principles of *Secured by Design* and *Safer Parking Scheme Park Mark Award*; suggest planning condition accordingly; careful consideration to control access to basements and arcades; routes designed to deter and reduce crime; CCTV to be integrated with city centre system.
- Environment Agency: No objection, subject to conditions – vulnerable residential uses above 57.11 AOD; details of operation of flood mitigation measures; development fully in accordance with submitted Flood Risk Assessment; sustainable drainage principles; further investigation of contamination and verification of mitigation; later unidentified contamination to be addressed; piling methods to be agreed.
- Thames Water: Developer to make provision for drainage to ground, watercourse or sewer; condition relating to drainage strategy suggested; various informatives suggested.
- Vale of White Horse District Council: No objections.
- Cherwell District Council: No objections.

Other Interested Parties.

- Oxfordshire Green Party: Doubt viability of development; doubt it will lead to employment benefits claimed, but rather will take jobs from existing businesses; concerned it may diminish Oxford as a heritage and landscape asset; would add little to housing stock; should provide 50% affordable housing; scale and lack of permeability do not reflect character of Oxford; traffic and pollution need to be resolved; transport assessment unsatisfactory - would attract car borne shoppers and traffic congestion, especially on Botley

and Abingdon Roads; pollution on streets such as Thames Street, Abingdon Road and Botley Road must be improved to safe levels; disturbance during construction; adverse impact on views; flooding a real danger and a reason to reject application; not sustainable; disadvantages outweigh benefits.

- Oxford Civic Society: Question assumption that split of journeys between different modes of transport would remain the same as now; absence of implications for bus service schedules is a serious omission; proposals for traffic management on Speedwell Street, Thames Street and west of Castle Street are complex; proposals for Thames Street appear contradictory to aspirations for Oxpens; concerned about additional traffic generation, rerouting of services and air quality; no consideration given to the effects of future improvements to rail services; absence of coherent transport strategy unfortunate; much more detailed analysis of transport effects required; design inward looking and may not be perceived as an integral and fully connected element of city; considerable lengths of inactive frontages will contribute to severance from adjacent areas; application premature; provides insufficient evidence of satisfactory design and transport solutions.
- St. Ebbe's New Development Residents Association (SENDRA): Concerned about architectural concept, flood risk management and city centre accessibility; development inward looking; welcome connectivity but better connection to south and west required; peripheral access roads sub optimal; Thames Street frontage with large bland elevations represents poor urban design; welcoming entrance from south required; flood strategy represents a danger to communities in South Oxford; further details of flood mitigation required, and to be agreed by all parties; assumption that excess demand for car parking would switch to Park and Ride but no evidence to demonstrate; scale and type of development will increase demand for car trips; traffic forecast analysis has gaps and raises questions; travel survey methodology flawed; transport assessment should be undertaken on basis of projected population levels over 10 to 15 year period; overall effect of John Lewis store particularly uncertain; no evidence to support assertion that sufficient bus capacity exists to accommodate demand; further evidence of capacity of bus stops etc required; recommend review of issues raised.
- Paradise Lodge Residents Co. Limited: Rerouting of buses will have negative effect on quality of life due to increased noise, vibration and air pollution; buses in Castle Street / Norfolk Street should be restricted to those entering city from south or west; would wish to be consulted on effects on air quality and mitigation proposed; would also wish to be consulted on landscape / public realm buffer to frontage of Tennyson Lodge; bus priority route should not be used for deliveries or any vehicles other than buses and cycles; loss of daylight and outlook from John Lewis store; footprint of John Lewis store should be as far away from Tennyson Lodge as possible; overlooking from buildings on east side of Norfolk Street; would wish to discuss raising height of wall to garden of Tennyson Lodge to protect privacy; would wish to be consulted on arrangements during construction phase.
- City of Oxford Licensed Taxi Cab Association (COLTA): Object to taxi rank on Old Greyfriars Street as it would be on wrong side of town; rank should be in Cornmarket Street, New Road or Castle Street; proposed rank will also increase noise for residents around the site, and result in increased fares for passengers.

- Oxford Castle Limited: Support intention to redevelop Westgate Shopping Centre - opportunity to enhance historic core; will increase number of visitors and promote regeneration of West End; increased retail floorspace will put increase pressure on highways and transport systems; too many cafes and restaurants; regret loss of bus hub (in previous application); priority should be given to pedestrians in Castle Street; relocation of library a missed opportunity; welcome removal of Castle Street underpass; Castle Street should have 10 MPH speed limit; bus stops should be in Oxpens not Castle Street.
- Oxford Preservation Trust: Contrary to high buildings, view cones and heritage policies; not possible to assess impact on heritage assets or if final design will be of high quality; disappointed there are no public spaces created outside development site; regret some thoroughfares not open 24 hours each day; Middle Square could be extended into public space facing Castle Street; concerned about impact in views from surrounding hills and from viewing points within the city centre; do not accept that development would have beneficial effect on views; entrance from Castle Street not at appropriate point in street; blank facades to Castle Street; further details should be required.
- Oxfordshire Architectural and Historical Society (i): Object, outline application inadequate basis to assess impact; buildings should preserve and enhance historic environment by opening up townscape not concealing it; full photographic record required of buildings to be demolished; Roger Bacon plaque in Old Greyfriars Street should be preserved and remounted; illustration of view along Turn Again lane inadequate; bridge across Castle Street to castle development should be considered; openness of Oxpens Meadow compromised; cross routes should be open to cyclists; potential threat to existing cinemas; more space should be allocated to Local Studies section of Westgate Library.
- Oxfordshire Architectural and Historical Society (ii): Remains of Medieval Franciscan Friary of national and international importance; archaeological remains represent physical evidence of Oxford's role in development of learning in Medieval Europe; development would result in substantial harm to archaeology which should remain in situ; preservation of archaeology in situ is feasible and would add long term public benefit; recommend outline permission is not granted unless strategy for full preservation in situ to avoid harm to archaeological heritage is incorporated into design; if approved conditions should be applied to provide for implementation of strategy to safeguard archaeological heritage.
- Activate Learning (Formerly Oxford & Cherwell Valley College): True nature and scale of development uncertain; building may be too high and overbearing in relation to waterfront - 4 storeys with broken skyline preferred; rear of western block would not enhance area and deliver poor urban design; insufficient room for pedestrians accessing college from waterfront; Thames Street junction complex and restrictive to pedestrians; bus movements on Abbey Place potentially dangerous and would restrict pedestrian and cycle movement; opposed to entrance to underground car park which may lead to queues and tailbacks with disruption to college; car park entrance would detract from river frontage.
- Oxford Pedestrians Association: Cannot fully support or oppose proposals;

insufficient detail to provide more positive response; main concern is impact of increased traffic volumes including harmful emissions; target for car parking spaces too high; Thames Street frontage needs to be welcoming for pedestrians and cyclists; concerned about possible flooding implications; mitigation needs to be in place to ensure development does not dominate cityscape; opposed to buildings exceeding height limits.

- Stagecoach: Strongly support principle of redevelopment; concerned about basis of estimating baseline trips - applicants over estimate spare capacity available on services when demand is greatest; significantly more bus movements per hour likely to need accommodating in Castle Street / Norfolk Street; welcome additional bus stand capacity in Castle Street which will create opportunities for better cross city bus links; concerned that shared space design is not entirely appropriate; crossing points not at strongest desire lines; alignment of carriageway needs to allow 2 buses to pass at corners; sufficient space needs to be available for waiting passengers; relationship of bus shelters to shop fronts needs consideration; need to retain "cut through" from bus priority route to Oxpens Road; would prefer larger number of buses to terminate and lay over at Speedwell Street / Butterwyke Place; Travel Plan during construction phase will be challenging.
- Oxford Bus Company: Welcome development of Westgate; will improve retail offer and prosperity; closure of Queen Street to buses would have significant impact on bus services; work to reallocate bus stops to other locations ongoing; waiting areas for passengers in parts of Castle Street is very tight; failure to make adequate provision for buses would lead to congestion; working to principle that every bus service must stop within 350m of Carfax and there are no increased walking distances for passengers which could lead to decline in patronage; longer journey times need to be avoided; long distance services (especially to London and airports) need to be well provided for; bus stop to Thames Street for long distance services and route to Gloucester Green need to be acceptable and no worse than existing; proposals should be viewed jointly with proposals for Oxpens and railway station.

Individual Comments.

Fourteen individual comments were received from private residents. The main points raised were:

- insufficient residential accommodation.
- concern about air quality / pollution levels, especially at Tennyson lodge / Abbey Place.
- may cause construction delivery congestion.
- freight consolidation centre should be considered;
- no requirement for large retail development.
- no requirement for additional cinemas.
- increased traffic and congestion.
- potential loss of wildlife to Castle Mill Stream.
- development premature – should be considered in wider context with other city centre developments.
- capacity to absorb increased bus patronage uncertain.
- road conditions would deteriorate with longer queues over longer periods.

- Buildings too tall / out of scale.
- route around Paradise Square questionable.
- query whether arrangements in Castle Street / Norfolk Street are workable.
- department store not required - recreational areas required instead.
- increased potential for flooding.
- development too inward looking.
- too many blank external edges or dead spaces.
- independent shops need to be accommodated.
- public realm to Thames Street poor.
- development should be refused in current form
- cycle access and facilities need to be improved.
- cycle and pedestrian access along Castle Mill Stream essential.
- better access from railway station needed.
- better integration of public transport required.

Consultation undertaken by City Council on Receipt of Amendments to Planning Application.

Statutory Organisations.

- Environment Agency: Previous comments reiterated; suggest additional conditions relating to groundwater monitoring and dewatering.
- Natural England. Previously commented; amendments unlikely to have significantly different impacts on natural environment; previous advice applies; no objection was made to original proposals.
- English Heritage: Amendments go small way to reduce maximum height of some parts of development and can be accepted as moving in the right direction; no adequate explanation for excess height or assurance that it would be handled in a persuasive way; roof treatment not yet well designed; previous comments therefore still stand; more illustrative detail should be provided; should be no further increase in height; any tower at Castle Street / New Road junction should be well designed and add to diversity in roofscapes; archaeology represents highly graded historic asset; harm to archaeology would be substantial and should only be accepted if there are substantial public benefits which outweigh loss; design issues might be addressed at reserved matters stage; needs to be established that public benefits outweigh substantial harm.
- Thames Valley Police Crime Prevention Officer: Nothing to add to previous comments
- County Council: Overall View: Support proposals subject to appropriate conditions, legal agreements and informatives.
- County Council: Education: No objection subject to conditions, legal agreements and informatives; development could generate up to 8 additional school aged children; expansion of primary and secondary school capacity would be required, as well as special educational needs; Westgate development should contribute to costs of new school at Bertie Place via CIL.
- County Council: Economy, Skills and Training: Development provides opportunity for local residents to access employment; effort should be

made to employ local people in development; recommend preparation of skills and employment action plan; would wish to see training and apprenticeship opportunities; would wish to see temporary skills and employment project manager appointed for 3 years.

- County Council: Transport: No objection subject to conditions, legal agreements and informatives; works beyond site boundary to be funded to appropriate quality standard by applicant; would press for higher degree of active frontage, especially to Thames street; disappointing that Pennyfarthing Place not included in list of highway works; sufficient footway widths need to be provided to accommodate street furniture etc; support deletion of coach “cut through” from bus priority route to Thames Street; stopping up, adoption, or works to highway secured by S. 278 / S.38 of Highways Act; transport assessment scoped by Highway authority; minimum of 1000 public car parking spaces to be achieved if possible; County would seek to replace lost car parking spaces at other city centre locations; support dispersal of cycle parking around site and proposed integrated cycle facility; may seek cycle route improvements; public routes to be covered by permissive rights; new wayfinding scheme required; support pedestrianisation of Queen Street which development facilitates; details of shopmobility scheme required; further details of servicing arrangements required; arrangements for taxis acceptable; satisfied that traffic modelling has been carried out correctly; roads and junctions will be able to accommodate additional traffic including with Frideswide Square and Oxpens developments in place; increase in traffic on radial routes acceptable, though some mitigation may be required funded from CIL; traffic effects greatest during shopping times – car park management plan required to demonstrate how congestion would be avoided at peak times; substantial increase in Park and Ride and other bus trips; appropriate level of bus stop provision, including if Queen Street is closed to bus movements; real time information and bus shelters required; improvements to park and ride may be required; Oxford has one of cleanest bus fleets in UK - County will continue to work to reduce emissions further.
- County Council: Property: Support proposals subject to conditions, legal agreement and informatives; suitable and convenient access for deliveries to Westgate library required; would object to relocation of public entrance to library to Castle Street; library needs to maintain public access from Bonn Square; would welcome high quality replacement façade at entrance to library.
- County Council: Ecology: Opportunity to enhance quality of environment and biodiversity; need to investigate any protected species; should protect habitats and provide enhancement, including to Castle Mill Stream; long term management of habitats and biodiversity features required.
- County Council: Archaeology: No objection; archaeological advice to be provided by City Archaeologist.
- County Council: Minerals and Waste: No objection sustainable construction, use of materials and management of waste are addressed in application, including commitment to waste management plan.
- County Council: Planning Obligations: County priorities for funding via CIL arising from development are: primary, secondary and SEN education;

expansion of Park & Ride system; reconfiguration of city centre bus and passenger waiting facilities, including real-time information; traffic management schemes, including Frideswide Square and its approaches; city-wide parking management system; public realm enhancements, including wayfinding; contribution to Oxpens cycle/pedestrian bridge; and freight consolidation network.

Other Interested Parties.

- Stagecoach: Reviewed applicant's response to previously expressed concerns; concerns now addressed as far as possible at outline stage; in particular welcome revised tracking and amendments to design of lay bys to Castle Street and Norfolk Street; reinstatement of pedestrian crossing at northern end of Castle Street welcomed; traffic ramps not now exceeding 1:30 gradient; detailed design of passenger waiting facilities to be addressed at reserved matters stage; disappointed that "cut through" to Thames Street is deleted; recognise difficulty in anticipating detailed travel behaviour as a consequence of development; also recognise that more bus stops would be provided in immediate vicinity of development; committed to working constructively with applicant and Highway Authority.
- Oxford Bus Company: Pleased to see continuing dialogue with bus companies; disappointed at loss of "cut through" from bus priority route to Thames street, but understand reasons for doing so – may restrict future options for routing of services; continue to work positively with Highway authority and applicant in relation to closure of Queen street, bus stopping arrangements etc; concerns addressed in all substantive respects as far as possible at this outline stage; look forward to making development a success.
- Oxford Preservation Trust. Previously expressed concerns not assuaged; application should be advertised as a "departure".
- Oxford Civic Society: Support principle of development but previous concerns not addressed; would wish to view County Council forthcoming transport strategy; note changes to heights and proportion of active frontages but buildings still inward looking and separated from surroundings; recommend concerns are reviewed and decision deferred until further consultation on transport proposals.
- St. Ebbe's New Developments Residents Association (SENDRA). Support principle of development; concerned about design concept, arrangements for access, air quality and flood risk; design options should be made available to public; development too large and inward looking; stronger reference to West End required with well defined entrance to south; consultation on County transport strategy first required; traffic lights to Blackfriars Road required; wider southern footpath would bring development closer to Thames Street; noise embankment to Thames Street should be enhanced; air quality model should be reviewed; need reassurance on flooding arrangements; query who would manage flood arrangements to basement car park; Environment Agency need to review their requirements; development should have no adverse effects on St. Ebbe's in flood conditions.
- Oxfordshire Architectural and Historical Society: Welcome recognition of national importance of archaeology; unclear what additional disturbance

would arise (eg diversion of Trill Mill Stream) - suggests total loss of archaeology; does not adequately identify potential impacts; incomplete consideration of NPPF requirements and Local Plan policies; no serious effort to ascertain if archaeology can be retained in situ to avoid or reduce impacts.

Individual Comments.

- Change in character of city.
- Views of city should be retained.
- Unrealistic assumptions of how much traffic would transfer to Park and Ride.
- Heights to buildings should be within policy requirements.
- Use of basement car park for flood water storage is an unknown quantity.
- Potential impact of flooding for local residents.
- Impact on groundwater and surface flooding.
- Concern that underground car park may increase potential for flooding elsewhere.
- Development should be planned in wider West End context.
- Increased traffic and pollution.
- More residential accommodation, especially affordable, should be included.
- City does not need new jobs created.
- Development does not reflect archaeology and history of the locality.
- More could be made of Trill Mill Stream.
- Concert hall should have been considered rather than cinemas and restaurants.
- No justification for increased retail provision.
- Height of buildings would affect views.

In addition several dozen standard responses in support of the planning application have been received.

Lastly, the South East Regional Design Panel (SERDP) considered the outline proposals prior to and following the submission of the planning application. In summary whilst the Panel supported the aims of the project and were encouraged by the quality of architects commissioned for the detailed designs in due course, it retained reservations that the mechanism of an outline application supported by fixed Development Principles and Parameter Plans would provide the requisite balance of control and flexibility to inform detailed designs. The Panel welcomed the approach of creating urban blocks as an extension of the city centre but felt the design had not progressed sufficiently to reflect the stated ambition. It felt that the external edges of the development would be critical, and that more needed to be done to reflect the morphology of the city. Similarly it was felt the development would benefit from the inclusion of residential development which would assist in integration with the wider city. Although no objection was raised to heights of buildings, it was felt care was needed in terms of the relationships to areas such as Faulkner Street and Abbey Place.

In response the applicants have indicated that the comments of the SERDP are

both informative and beneficial in moving the proposals forward. They emphasise however that the outline permission was submitted in this form in order to secure the principle of development but also to identify building envelopes and the extent of public realm whilst retaining flexibility to allow detailed designs to emerge within an agreed framework at the reserved matters stage. They note that no objection was raised to the heights of buildings but that challenges remained, for example in respect of the elevational treatments, activating street frontages and formulating appropriate roof structures. Amendments to the application submitted in January 2014 begin to address these issues.