

Banbury Civic Society's Consultation Response to the Banbury Canalside Draft Supplementary Planning Document

This Appendix reproduces in full the Banbury Civic Society Canalside Working Party's response to the CDC's Draft Canalside Supplementary Planning Document (SPD).

Its structure was dictated by the five specific questions posed within the CDC's consultation questionnaire.

The seven Character Areas in this Appendix are similar to, but not the same, as those discussed in the Civic Society's 'Vision'.

This Appendix is included for completeness and because it raises a number of concerns about the draft SPD that have not required discussion within the 'Vision'.

Preface

As the Oxford Canal and the River Cherwell pass through Banbury, the canal and river corridor is clearly a neglected, but fragile and historic area. Once at the heart of Banbury life, the combination of river, canal, railway and road have left the area physically isolated and vulnerable to flooding. 20th-century development has broken and fragmented eastern Banbury and demonstrated how vulnerable the area is to unsuitable development.

The Banbury Civic Society believes that the proposed regeneration of the Banbury Canalside represents a major opportunity to mend past damage and to reintegrate this neglected area back into the mainstream of town life. The proposed regeneration must create a coherent, vibrant, contemporary, high quality, and sustainable environment for the benefit of Banburians and visitors alike.

The railway station provides the context for a new urban gateway and there are ample sites within the area, and adjacent to it, for sustainable residential development, including essential facilities and affordable housing. The canal and its heritage context deserve respect as one of the

major sources of Banbury's historic identity and offer the potential for a future destination of character. The historic wharves and faded industrial areas offer opportunities for mixed-use communities, combining housing, employment, tourism and leisure, whilst the canal, river and their surroundings offer the potential for a green leisure lung through the south of the town.

The Banbury Civic Society welcomes the opportunity to contribute to public debate on the revitalisation of this key area of Banbury's town centre, both during the initial stakeholder discussions and through the formal public consultation process on the draft SPD.

In order to inform and stimulate general interest and discussion, the Civic Society arranged two public meetings to identify issues and concerns to Banbury residents, a guided coach trip to four regenerating canal towns and a guided Sunday walk through the area.

The following comments are based on opinions expressed and notes taken at these events, comments sent to the Society by the public and discussions between the variously qualified members of the Civic Society Canalside Working Party.

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1. The principle of regenerating Canalside

The Banbury Civic Society recognises the proposal as a major opportunity to influence the revival of Banbury. We need new facilities for the expanding local community including housing, a revival of the key canalside artery and a zone which all Banbury's population adopts as their own.

Done well, the regeneration of this neglected and damaged historic area, this development opportunity represents a fantastic opportunity to redress past damage and draw this once-important back into the mainstream of the contemporary town. Done badly, or half-heartedly, the regeneration of Canalside could rob the town of its last remaining area of authentic but decayed character and replace it with shops that may further damage the prosperity of the Old Town and monoculture housing for which there is limited proven demand.

The regeneration has the potential to address major town-planning problems that, to date, have proved mistaken or impossible to resolve. Such issues include:

- The stranglehold of the river, canal and railway, to movement east/west through the town, which is the cause of the significant and worsening traffic congestion on Bridge Street/Middleton Road and Station Approach.
- The formidable east/west pedestrian barrier of the very busy Bridge Street crossroads and Cherwell Street/Windsor Street. (The proposal to allow for the dualling of Cherwell Street/Bridge Street can only make this bad situation worse).

- The broken and fragmented eastern edge of the Newland community
- The perceived need for a multi-modal train / bus interchange to resolve the current dislocation between bus and railway stations. (By leaving the present bus station where it is, the proposal does not appear to provide a comprehensive solution).

To achieve the potential of this new opportunity, we need a thoughtful, high quality development that provides a sustainable and contemporary environment which draws on Banbury's extensive history to mark and root new developments. Banbury may be the 'typical market town' but it could be a noteworthy town where individual and unique developments reflect local concern for identity – a place of which we are proud and that we are proud to show to others.

“... we must not sacrifice quality. To do so would be a false economy as all you end up with is places that attract crime, deter investment and harm the environment. Places that people don't like, or where they don't feel safe, soon become underused and under-loved and end up crying out for re-development.”

(World Class Places: Action Plan, autumn 2009. Joint Foreword by Ben Bradshaw MP: Secretary of State for Culture, Media and Sport, and Ian Austin MP: Parliamentary Under-Secretary of State for Communities and Local Government)

2. The vision and objectives for Canalside

The Vision set out in the SPD seems very good as far as it goes. We are nevertheless concerned that the Vision is frequently not reflected in the detail. For example:

- The Vision encourages office use and live-work, but the detailed Specifications for the Character Areas make no allowance for live-work units and allow for what seems to be a relatively small quantum of 'commercial' employment, limited to 2 of the 7 Areas. One of these areas (Station) appears to have very limited space for such uses. Commercial employment in the other designated Area, 'Canal Walk' is to be located solely in the few historic buildings to be retained, whose limited spaces are to be shared with 'Retail'.
- The Vision encourages sustainability, but makes no provision for the reuse of Banbury's most significant industrial heritage assets: The former Burgess buildings (formerly the Barrows & Carmichael traction engine works) and the last surviving ranges of the Samuelson's

agricultural engineering works within the present Swan Foundry complex. These lie in an area assigned, on the Masterplan, for 100% Residential and Associated Uses for which the buildings are unlikely to be suitable.

- The Vision encourages sustainability yet provides limited space for Green Infrastructure, much of which may or may not have public access. Whilst (very limited) public open spaces are indicated, it is unclear how the allowances in the Specifications for each area are to accommodate allotments, flood attenuation areas or reed-bed waste water treatment.
- The Vision demands that prospective residents sign up to a lifetime choice for 'overtly modern' living when there is no guidance as to the meaning of this phrase and an uncertain demand for such living spaces. The demand is possibly too rigid in a rapidly changing world.
- The Vision offers little to ensure that this development works in context with the existing town and little to indicate that the development will play a significant role in the resolution of wider town-planning issues that currently bedevil it. The detail within the SPD currently falls too far short of addressing issues which focus on the location of this isolated but central site, in particular:
 1. The stranglehold of the river, canal and railway to movement east/west.
 2. The formidable pedestrian barrier of Bridge Street crossroads and Cherwell Street/Windsor Street: which widening would exacerbate.
 3. The current dislocation between bus and railway stations.
 4. The fragmented and broken nature of the eastern side of the Newlands community.

The Banbury Civic Society respectfully offers its Vision of the potential of this important regeneration development based on the views and opinions expressed and notes taken at four public events, comments sent to the Society by the public and discussions between the variously qualified members of the Civic Society Working Party. The Vision is:

The Vision must be to create a varied but cohesive area that reflects both the time and place of its making: a sensitive, high quality, contemporary environment which, in reflecting its rural and industrial past, seeks to encourage pride and confidence in the future of Banbury. Situated around an important gateway to the town, the area should offer a high quality and distinctive World Class vision of the town to the outside world and an active World Class new environment for all the people of Banbury to enjoy.

The Objectives are as the Vision, laudable, but regrettably too much appears to get lost in the detail.

CDC Objective 1. Deliver a Balanced Community

The aspiration for a balanced housing-led community is uncontroversial.

The detailed Specifications set out for the individual Character Areas dictate that the development will be 85% housing, and 15% retail situated in one location, with no other provisions specified. The SPD thus seeks to replace skilled manufacturing and service industries with housing and some low-paid retail employment. There is no requirement in the Specifications for community facilities, office space, live-work space, a canal basin nor for any significant areas of public

open space. Whilst a small amount of Green Infrastructure is included in the area Specifications, the function and ownership of that space is not determined, so that access and use for the community are not secure.

By making no allowances for such facilities in the Specification for any of the individual character areas implies that all such provision is expected to come forward as part of a single planning application for the whole site. This is both an undesirable and probably unlikely scenario. To encourage the site to roll out in small units over a sustained period, there must be much more detail about sensible phasing of the development area and more specific detail in the Specifications for each character area.

CDC Objective 2. Encourage a Low-Carbon Lifestyle

Again, this is an uncontroversial objective and will, increasingly, be law by the time this site comes forward. Possibly the SPD should aim higher by targeting part of the area for eco-village status. The detail within the SPD currently fails in this objective by:

1. Being so densely developed so as to allow little or no space for sustainable urban drainage, reed bed waste water treatment, public open space nor food production.
- 2 Providing no requirement for live-work units.
3. Providing for no skilled employment within the site except for the small-scale 'commercial' employment located in some of the historic buildings in 'Canal Walk'.

4. Not providing for a comprehensive train / bus multi-modal public transport interchange.

In order to traffic-calm the town centre, the provision of space to allow the creation of a dual-carriageway along Windsor Street/Cherwell Street has to be a highly regrettable and retrograde proposal, especially now a south to east link road is appearing to be a realistic prospect. The dualling of Windsor Street/Cherwell Street would be likely to kill off such a proposal, to the detriment of the town and the potential of south Grimsbury to accommodate residential growth on underused industrial land.

CDC Objective 3. Build on the Heritage of the Site

The Banbury Civic Society is pleased that the SPD aims to retain the historic street pattern and a number of the area's few remaining historic buildings. Unfortunately the SPD then fails to ensure the retention of a number of iconic Locally Listed buildings. The objective to reflect past densities and building forms is viewed as a very positive way to mend past damage and to build a unique, distinctive and sustainable development. The repeated use of the word "could" rather than "will" in this Objective is viewed as giving it only minimal weight in planning terms, especially as no illustrations are given in the SPD to aid prospective developers.

Unfortunately, the SPD appears not to live up to this objective in that:

- It gives no guidance whatsoever in showing what the historic densities, layouts and spaces were, nor does it give any guidance on the desired past building forms.

- It nowhere seeks that development should be locally-distinctive
- It makes no provision for the enhancement or opening up of Banbury's Grade II-listed 13th-century bridge between the canal and railway bridges (Banbury's only surviving medieval structure)
- It makes no provision for the retention of the unlisted and locally listed Victorian buildings on north side of Bridge Street that are so vital to the area's remaining historic character and which could present an appropriate historic town gateway
- It makes no provision for the reuse of the Barrows & Carmichael traction engine works (Burgess's) and the last surviving ranges of the Samuelsons agricultural implement works (within the Swan Foundry complex). In not aspiring to retain these structures (indeed by encouraging the reuse of their sites for housing) the SPD could be said to encourage the demolition of the area's most locally significant heritage assets, as these are Banbury's last surviving vestiges of Banbury's three principal 19th-century industries (Plush, Brewing and Engineering).

CDC Objective 4: Improve Accessibility

These objectives are again applauded. Again however there appears to be inadequate detail in the SPD to ensure these objectives are met should the development come forward over a number of years under a number of different developers. The planned infrastructure of bridges and foot- and cycle-paths, public space and green infrastructure needs to be planned from the start if individual developers are not to abrogate their responsibilities in a poorly-phased development.

There appear to be three fundamental flaws in the current SPD. These are that:

- The SPD does not recognise the potential for a south-to-east link road, instead making provision for the dualling of Windsor Street / Bridge Street. Such a proposition would reduce the site's accessibility and must be seen as undesirable
- The only additional cross-rail linkage provided for is an extended station footbridge. This cannot be adequate to give genuine, public east-west permeability across the site

“Good urban design interprets and builds upon the historic character, the existing landscape and the aspirations of the local communities, and arrives at a vision of what a place might become.”

(Where we Live: A Guidebook to Urban Design, 2008, funded by SEEDA through South East Excellence)

- The SPD does not achieve the long-awaited linking of Tramway and Station Approach, thereby adding traffic to Windsor Street / Cherwell Street and failing to relieve congestion on the Station Approach / Bridge Street junction

CDC Objective 5: Optimise the Natural Assets of the Site

Again, the objective is applauded, albeit that the site currently has few natural assets, save for an embanked river with notoriously low flow. Certainly there is much to improve upon. We nevertheless deeply regret the deletion of the long, linear park running the length of the site between the river and the canal, as shown during previous phases

of consultation. We believe that such a green 'lung' is likely to be essential for public well-being and effective flood attenuation.

Again, it is difficult to visualise how the aspired-to green infrastructure of amenity areas, green spaces, greens, allotments, play areas, health trails and playing pitches will come forward from such a high-density development, especially if it were to roll out as part of a multi-developer, multi-phased development. Whilst the allowances in the detailed Specifications for each character area are set out, we feel that the routes and locations of the green infrastructure need to be far more transparent and planned in far more detail through more generous specifications and a much more detailed masterplan

3. The mix and quantity of development on Canalside

The mix of development is seen as generally appropriate, although probably too predicated on purely residential development for a truly sustainable mixed-use community. The current quantum of 'commercial' floorspace would appear to be too light, most especially if the Barrows & Carmichael traction engine works (Burgess's) and the last surviving ranges of the Samuelsons agricultural implement works (within the Swan Foundry complex) remain allocated for demolition and residential after-use. Certainly, at present, more scope for office / commercial / light manufacture would appear to be necessary in buildings other than small number of refurbished historic buildings currently proposed for retention, only half of which are currently allocated for commercial use. The allocation of the Bridge Street area in the Specifications for retail use only would seem to be a mistake, especially as this is likely to be the most attractive area for small in-town offices space.

Appendix 3 (cont.)

Whilst the allocations for corner shops and other community facilities appears to be adequate, we believe that much more work will be required on the detailed Specifications and masterplans for each character area to ensure an appropriate mix and geographical spread of these facilities if they are to be brought forward through a multi-phase, multi-developer development.

We are concerned that the proposed development currently lacks a 'destination' at its southern end. The further one follows the river / canal, the more one is lost in a sea of housing. We believe that the Barrows & Carmichael traction engine works (Burgess's) and the last surviving ranges of the Samuelsons agricultural implement works (within the Swan Foundry complex) could provide a satellite mixed commercial / leisure / retail nexus that could be a significant asset to the Canalside / Cherwell Heights / Bankside area.

With regard to the quantity of development, it is difficult to comment as the rationale of the viability studies is not explained in the SPD or supporting documentation. Whilst the Specifications can be read to give housing numbers anywhere between 750 and 1400 homes, it seems clear from hearing Mary Harpley speak publicly that 1200 is the desired number of houses. This seems ambitious and certainly will delay the completion of the project as it will take the private sector decades to build 7500 houses in Banbury, if there is not to be a significant downward effect on house prices. The circa 1200 quantum is nevertheless understandable, given the sustainability credentials of the site and the desires of many to limit edge-of-town development. We nevertheless believe that the proposed axing of the South East Plan may relieve some of the panic to find sites for so many homes. The currently proposed densities appear generally appropriate (although they might be increased in Tramway) and the variable numbers in the Specifications give some scope for a lessening of house numbers in the aftermath of the 'buy-to-let' bubble.

We are very concerned at the loss of the linear park running through the site from Bridge Street to the edge of town between the river and canal. This had been a very well-received feature of previous consultations and the previous LDA masterplan (Appendix 2). Its loss has been hard to explain and is greatly regretted.

We are also greatly concerned over the proposed loss of that the Barrows & Carmichael traction engine works (Burgess's) and the last surviving ranges of the Samuelsons agricultural implement works (within the Swan Foundry complex). We believe that these industrial icons to Banbury's engineering past could provide a satellite mixed commercial / leisure / retail destination that could be a significant asset to the Canalside development and to the wider Newlands / Hightown / Cherwell Heights / Bankside area. Losing these to a sea of unbroken housing seems regrettable in the extreme.

We believe that something of the desired quantum of residential development may be achievable without undue harm if the potential of the Tramway (Banbury Island) and Riverside (Tramway) character areas are maximised. We believe that between four and even six storeys may be possible in these areas, subject to rooftop gardens, green roofs and innovative layering and façade modelling. We are undaunted by the idea of a very strong and dramatic urban edge abutting the Cherwell meadows to the south of the town.

As previously stated, the quantum of commercial / office / small manufacturing appears to be too low to provide adequate, well-paid employment opportunities for such a significant quantum of housing. The retention of the Barrows & Carmichael traction engine works (Burgess's) and the last surviving ranges of the Samuelsons agricultural implement works (within the Swan Foundry complex) could go a long way to redress the balance.

Our last concern with regard to quantity of development is the potential effect of inappropriate retail in the Bridge Street area. The effect of Castle Quay on retail in the 'Old Town' has been very marked. Whilst boutique, leisure and destination shopping would be an asset to the area, we find it very difficult indeed to give support to a quantum of retail that could significantly add to the 'downhill' pressures that are already affecting the viability of the upper town. Given the dead-hand of retail on the canal at Castle Quay, we believe that a greater emphasis in this area on commercial / office use, as well as limited residential accommodation, should produce a much more vibrant environment that is an asset for, rather than a drain, on the wider town.

4. The CDC character areas

"... we must not sacrifice quality. To do so would be a false economy as all you end up with is places that attract crime, deter investment and harm the environment. Places that people don't like, or where they don't feel safe, soon become underused and under-loved and end up crying out for re-development."

(World Class Places: Action Plan 2009. Joint Foreword by Ben Bradshaw MP: Secretary of State for Culture, Media and Sport, and Ian Austin MP: Parliamentary Under-Secretary of State for Communities and Local Government)

Bridge Street: CDC Area 1

General Comment:

The proposed purpose and characteristics are for this key gateway area are endorsed but there is concern about the mass and nature of the commercial structures proposed at this major gateway to the town. Whilst the canal basin is included in the Masterplan and text of Area 1, there is no reference to the basin, water or leisure activities in the Specifications. There is concern about the likelihood of retail being over-dominant in this area. A number of issues remain.

1. Transport

Existing Problems:

- 1) Traffic congestion on Station Approach, Bridge Street and Bridge Street crossroads
- 2) Formidable pedestrian barrier of Bridge Street crossroads and Cherwell Street
- 3) Dislocation between bus and railway stations

Suggested Solutions:

- The much needed South-East link road (Bodicote to M40) needs to be recognised in the SPD, including a linkage to east side of station
- New through route from Tramway to Bridge Street (draft SPD shows this route blocked)

Appendix 3 (cont.)

- Left in / left out only from station entrance onto Bridge Street (except busses and taxis). Other station traffic to use eastern station entrance or Tramway approach
- Traffic calming. Remove traffic lights and street markings. Raised table pedestrian surfacing over north end of Cherwell Street
- Fore holistic solutions, the SPD area should include the present bus station and its environs.

2. Townscape and Building Style

Existing Problems:

- Haphazard and incoherent modern development on south side of Bridge Street and on Cherwell Street
- Lack of boat turning-point
- Fragmentation of historic wharf configuration of buildings set at 90 degrees to canal edge or set back behind open wharfage
- The unlisted and locally listed Victorian buildings on north side of Bridge Street have suffered neglect and unsympathetic alteration (These are scheduled for demolition in draft SPD).

Suggested Solutions:

- The unlisted and locally listed historic buildings on Bridge Street need to be respected to enhance the area's remaining historic character and present an appropriate historic town gateway.

- The isolated glazed structures shown in the draft SPD to illustrate Area 1 are unimaginative and inappropriate as a gateway to this historic quarter and the wider town
- Stronger and more specific design guidance is required in the SPD. This needs to demand high-quality and locally-distinctive contemporary design laid out in traditional wharf pattern, so as to avoid inappropriate 'overtly modern' development or bad pastiche in this sensitive and critical area.

3. Land Use

Current Problems:

- Poor current land use in SPD area
- Too much 'big' and 'medium' retail in the lower town. This has steadily killed trade in the 'Old Town'. (Any more big or medium retail would be better located on the former Sainsbury's site on Calthorpe Street)
- No canalside public open space

Suggested Solutions:

- The Bridge Wharf canal basin in the SPD is an attractive idea, but only if actively used and surrounded by public space and interesting active building frontages.
- There is a mis-match in the draft SPD between the text and Masterplan framework and the Specifications for this area. There is no recognition in the Specifications of the stated canal basin, nor of the

promised 'commercial/leisure' shown on the Masterplan. In the Specs 'retail' is the only stated use. The specifications need to be amended 1) to include the area allocated for the canal basin and 2) to show the remainder of the area as mixed commercial/leisure.

4. Permeability

Current Problems:

- Poor pedestrian links between town centre, bus station and railway station. (The draft Masterplan indicates an essential sightline from the station to the town centre, but there is no allocated public urban space to facilitate this, nor any clear requirement for a pedestrian link)
- Poor access to canal
- Listed medieval openings of Banbury's 13th-century bridge are hidden and inaccessible (not addressed in draft SPD)

Suggested Solutions:

- Need for SPD to explicitly require an appealing pedestrian route from town centre to the station, via Bridge Wharf and a new canal bridge. The design guidance needs to incorporate landmark features, public spaces and implicit pedestrian guidance
- Retain and reopen the old Bridge Wharf gateway on Bridge Street.
- Improved pedestrian access to towpath
- Improved access to (and possibly through) the medieval bridge arches

Windsor Street: CDC Area 2

General Comment:

This corridor between the established town and the new development is critical in offering an interface that respects the existing characteristics of both canalside and Newlands and which encourages integration and movement between the old and new areas of town. This should not be a traffic-dominated interface, but rather a mixed-use street, encouraging pedestrian use, and access to the canal and streets on either side. The area offers a good central site for affordable housing.

1. Active frontages:

Problem:

The proposal appears to offer relatively inactive residential frontages, which seem to do little to mend the smashed fabric of eastern Newlands.

Suggestion:

This area is ideal for occasional small office and workshop activity facing Windsor Street: extending outwards the pedestrian vitality of the town centre. Frontages here should aim to respect the rhythm and texture of the Newlands development, to restore the area's identity as a definable community.

2. Street patterns

Problem:

The proposed extendible 'boulevard' to Morrison's can only be justified by its temporary benefit to motor traffic passing through the heart of the town: temporary because it will become congested again in time. The traffic is already a formidable barrier, both visual and physical, for pedestrians trying to access Canalside, the station and the town centre..

Suggestions:

1. The current and increasing traffic flows will need more sophisticated, long-term resolution. This must include a new south to east link road offering alternative, less central routes from the Bodicote side of town to the M40. This proposed boulevard is likely to kill the prospect of such a link-road, to the great detriment of canalside and any prospect of environmental improvement of the town centre, probably for decades to come.

2. The heritage of areas to both east and west can be maintained by respect for the pattern of traditional roads, side streets and pathways that formerly linked the areas, and which can determine the grain and character of this character area.

Canal Walk: CDC Area 3

General Comment:

Potentially one of the most interesting areas of the development. Its original wharf areas offer numerous opportunities for access to the canal and, potentially, areas for leisure activities. To reflect

this, the area could more properly be named Wharfside. Whilst live-work units are included in the Area 3 text, no flats (studio or otherwise) are included in the Dwelling specifications. The proposed

retention of locally listed buildings and the fine grain of the area provide a sound design basis for imaginative, contemporary buildings that respect their context.

1. Mixed Use

Problem:

There is real concern that the dynamism and employment opportunities of the wide range of existing activities in this area will be lost in the new proposals.

Suggestion:

Extend the Commercial specifications to include some new build and retain the historically important and very locally significant industrial icons at the south of the site: the Burgess and Swan Foundry complex, for suitable small-scale services and employment, possibly live/work, to provide character and vitality in the area.

2. Access to the canal

Problem:

There is no direct reference in the SPD regarding canal access or canalside views: the emphasis being focussed on Lower Cherwell Street instead. In the sketch of the area as viewed from Cherwell Park, buildings crowd the canal leaving only a narrow path. This would discourage public access to what is clearly an area of considerable potential for leisure activities.

Suggestion:

The area needs to maintain and improve its access to the Oxford Canal and maximise the many opportunities provided by the canal.

3. Townscape Elements

Problem:

Without references to the retention of names and smaller details of historic fabric e.g. a weighbridge, paving or views, much of the history and character of the area will be lost.

Suggestion:

Heritage sites and details of historic fabric should be retained and enhanced to provide a greater understanding of, and pride in, the industrial history of this important area.

Cherwell Park: CDC Area 4

General Comment:

Both the published image and name are misleading. The image (of Canal Walk) looks out from the area and does not show the area itself. The name is misleading as a tight interfluvial site that was proposed as a park in the first consultation masterplan for the area has been replaced with a large area of high-density flats, coloured in green and called Cherwell Park on the CDC Character Area plan. There appears to be a mis-match within the Specifications, where the massing is allowed for up to 4 storeys, but the Dwellings are restricted to 2- and 3-bed houses. A further query is raised about the Parkland shown within the Specifications, but which is not shown on the Masterplan.

1. Function

Problem:

The proposal for high-density housing between two watercourses in an area subject to flooding seems misplaced. Housing has replaced an area originally designed as a flood attenuation area understood to have been required for the neighbouring areas.

Suggestion:

Revert to the original layout of a long, linear park between the river and canal, providing access to all areas of the new development and able to act as flood attenuation for the neighbouring areas.

2. Residential Access and Character

Problem:

The proposed area, that is hardly detailed, seems to raise major problems of access (there is next to no access shown), flood protection and character building. An area which had great potential to be an extension of Spiceball Park through the town has been sacrificed to bland, high-density flats with poor access located in a flood risk area.

Suggestion:

Reinstate the park. If necessary, lost residential opportunities here can be met in CDC Character Area 7 - Riverside, with some increase in height and possibly some local loss in the green space there. Pedestrian access to a green Cherwell Park would then be possible from the town centre and all areas of the Banbury Canalside.

Station: CDC Area 5

General Comment:

Banbury desperately needs a welcoming gateway station and practical transport interchange. The proposal fails to resolve bus, car and taxi access, especially at the Bridge Street junction. The 24-hour bridge access east/west for pedestrians together with appropriate multi-storey car parks are to be welcomed but significant local issues need to be resolved. Recent (Nov 09) national discussion with regard to the character of railway stations requires recognition.

1. Vehicular Access

Problem:

The long-promised multi-modal interchange does not seem to be achieved by what is proposed. The proposal fails to recognise the practicalities of peak hour access. The continued restriction of north/south car movement via the station appears to be unacceptable. Buses are illustrated, but how will their punctuality and linkage be ensured, especially with the problems on Bridge Street?. Taxi waiting space appears minimal.

Suggestions as for CDC Area 1:

1. The SPD area needs to include the present bus station and its environs if a comprehensive bus / rail interchange is to be realised.
2. There would appear to be a need for traffic modelling to assess the benefits of opening the Tramway / station Approach link to through traffic, with a left in – left out exit / entrance to Station Approach, with eastbound traffic using/ the proposed east entrance to the station
2. The anticipated traffic problems here and on Cherwell Street / Windsor Street create a strong case for the long-awaited south-to-east link road from Bodicote to the M40, including links for this new development and the station.

2. Pedestrian Access to the Town Centre

Problem:

The diagonal route between Rail and Bus stations would be a considerable improvement to present conditions but the needs of the disabled and those with luggage will need to be considered.

Suggestion:

A more innovative linkage, integrated with the development within the Bridge Street character area must be sought.

3. Rail Heritage

Problem:

Apart from the existing station, which is fit for purpose, there is little surviving rail heritage in the area, with the exception of the Brunel Station Approach bridge and the locally-listed South Signal Box.

Suggestion:

These features should be considered for the role they may play in providing a memorable destination of character and interest.

4. Proposed Hotel and Residential

Problem:

In the small zone allocated, neither seems appropriate. Movement space and space for further expansion is essential in the station area and the proposed sharing of car parks between rail users and residents is likely to be problematical.

Suggestion:

It is suggested that the hotel would benefit from a view over Bridge wharf and its proposed canal basin. The small area between the river and canal would seem appropriate. The small, isolated residential development would be better if reallocated into the Tramway residential areas (CDC Areas 6 and 7).

Tramway (Banbury Island): CDC Area 6

General Comment:

The proposal is based on a major artery with largely residential frontages and with little or no provision for commercial or employment opportunities. There seems to be little recognition of the area's potential role to accommodate a continuation of previous the linear park concept, linking the town centre, the Tramway development and the watermeadows beyond. The Dwellings are restricted to 2- and 3-bed houses but the image shows buildings of a much higher massing. We believe that taller buildings may be possible in these areas, subject to rooftop gardens, green roofs and innovative layering and façade modelling. We are undaunted by the idea of a very strong and dramatic urban edge abutting the Cherwell meadows to the south of the town. Whilst this area is designated for a primary school, the reference to a 'community hub' is a mystery as there appear to be no cafes, shops or other 'casual' places where people would normally congregate within the Specifications.

1. Canal Orientation

Problem:

The proximity of the canal to this area seems to have been neglected and, like Canal Walk, the area seems to be focussed inwards onto a road whilst the waterside qualities and opportunities are missed.

Suggestion:

Heritage and water are recognised internationally as providing a valuable context for residential and leisure activities and provision should be made for public access to the area's watersides. The continued linear park and picnic areas might be examples.

2. Active Frontages

Problem:

The proposal implies relatively inactive residential frontages.

Suggestion:

Re-alignment of the housing to form groups, possibly around play areas, where social interaction can take place.

Riverside (Tramway): CDC Area 7

General Comment:

This appears to be a large, new residential zone lacking concern for the practicalities of service access. Its character seems to be ill-defined, although designing out the car is a positive attribute. The massing of 'up to 3 storeys' might well be able to be extended to incorporate some of the apartments lost in proposals for other areas. We believe that between four and even six storeys may be possible, subject to rooftop gardens, green roofs and innovative layering and façade modelling. We are undaunted by the idea of a very strong and dramatic urban edge abutting the Cherwell meadows to the south of the town. The area, together with Tramway (Banbury Island) lends itself well to being a small contemporary eco-development incorporating imaginative, sustainable design at the highest level.

1. Local identity

Problem:

In creating a significant new neighbourhood that might well accept a higher density of residential development there might be real concern

for 'place making' and local identity.

Suggestion:

In this regard, CDC Areas 6 and 7 need to be considered together.

2. Green infrastructure

Problem:

Although the green infrastructure is suggested on plan and mentioned in text, it is not clear that the form and role of such natural and leisure areas have been fully considered in structuring this area and others.

Suggestion:

In order to maintain the original green character of CDC Areas 4, 6 and 7, plus the canal and riversides, design guidance should emphasise the need for public and private green areas to be linked to create chains of visible, and largely accessible, green areas, for the benefit of residents and visitors alike.

3. Vehicular Access

Problem: Although the area has been chosen to be virtually car free, parking and loading facilities will be necessary for visitors as well as for disabled residents and deliveries.

Suggestion:

Following the 1960s example of New Ash Green in Kent, further examples of successful car-free living should be sought to offer imaginative design guidance.

5. How the site will be delivered

We believe that identifying the appropriate delivery model for this site is absolutely central to its success or failure. In the post-credit-crunch world, beset with sustainability and population issues, there are very few certainties about what future development will look like and how it will be funded. We thus believe that it is very important indeed that the adopted delivery model is not reliant on models, ideas or philosophies that may already be past their real sell-by date.

With a coming age of post-recession austerity and a changing political climate, it seems very likely that 'Blair box' architecture, buy-to-let tenement blocks, monolithic, single builder housing schemes and half-completed 'regenerated' town centres will become the loathed symbols of an unsustainable 15-year boom of unfettered property speculation. It also seems possible that the site may come forward much more slowly and in smaller units than may have been considered normal only a few years ago. It thus seems to be essential that the SPD, when it emerges, recognises and allows for the site to come forward gradually, organically and possibly in small parcels. It must allow for the likelihood of changing patterns in home ownership (e.g. the likelihood of more social provision of housing stock) and for changing attitudes to what has hitherto been deemed acceptable for speculative development to do to the valued environment of our historic town centres.

In such circumstances, a model we are particularly uncomfortable with is the 'super regeneration' model, comprising wholesale clearance of

the site and the upfront provision of a network of new road infrastructure and fully remediated, decontaminated, fully-serviced building plots. Such a model pre-judges the rapidly changing demands of the market, delivers plots that may be overpriced due to what may be seen in hindsight to have been unnecessary and inappropriate front-end costs. If the recovery is slow (and even if it is not), such a model runs the risk not only of leaving many currently viable businesses without affordable premises but also of leaving an enormous hole at the centre of town, containing nothing but a few boarded-up historic buildings, streets going nowhere, no new public space and a landscape of nothing but hoarded building plots surfaced only with the crushed remains of formerly useful buildings.

Because there is no requirement in the detailed Specifications for each area for community facilities, office space, live-work space, a canal basin nor for any significant areas of public open space, it is clear that the only way the site (or individual character area) is envisaged as coming forward is under a single planning application by either a single developer or a consortium of developers. We believe that this may be both an undesirable and, probably, unlikely scenario. To allow for the possibility of the site being rolled out in smaller units over a sustained period of, say, up to twenty years, we believe that the SPD must contain much more detail about the phasing of the development and much more detail in the masterplanning and Specifications for each Character Area.

It is our most strongly-held belief that there are much more successful, sustainable, low risk and less aggressive models for regeneration. The site, whilst neglected and damaged, has great assets in terms of location,

Appendix 3 (cont.)

historic character and, most importantly the key assets of both natural and artificial water. We believe that the site stands the very best chance of regenerating itself naturally and with the highest chance of success subject to the following:

- The key areas of the site are made as attractive as possible at the earliest opportunity. This might include public realm works in the Bridge Street / Bridge Wharf area, cosmetic or external 'shell' works to the site's more neglected historic buildings and, possibly even the creation of the promised canal basin. Such works might be funded jointly by an external regeneration agency (English Partnerships / SEEDA, an English Heritage HERS grant / HLF Townscape Heritage Initiative (subject to a Canalside conservation area) and directly by the Council. Such advance works could be repaid over time through a levy on future developments.
- The entirety of the land between the river and canal be allocated as future public and semi-public open space, for reasons of flood attenuation, public recreation and providing an attractive development environment. Such a park could be rolled out in phases if linked directly to the SPD's internal phasing.
- All of the site's remaining historic assets (whether or not listed or locally listed) be left intact and in use until acceptable and concrete development proposals come forward

- The final Supplementary Planning Guidance must allow adequate flexibility to accommodate changing development demands, climate change and sustainability requirements and changing public tastes and desires in terms of retail, leisure, travel and architecture
- The final Supplementary Planning Guidance must contain sufficient rigidity in terms of street pattern, access, permeability and green infrastructure to allow the site to develop in smaller plots without public facilities being squeezed out. And finally
- The SPD contains must contain strong guidance on the phasing of the development (currently wholly lacking) so as to give confidence that SPD areas and individual Character Areas are not blighted by long-term vacancy or premature clearance.

ENDS