

Our ref: [REDACTED]
Email: [REDACTED]
Date: 3 January 2024



Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

PORTAL RESPONSE ALSO SUBMITTED. THIS HAS ATTACHMENTS. DON'T SUMMARISE INTO DATABASE

Dear Sir/Madam

REFER TO THIS IN DATABASE AND REP #HERE

Ruskin Field – Representations to Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) Consultation

These representations have been prepared by Quod, on behalf of the University of West London ('UWL'), to respond to the Regulation 19 consultation being held by Oxford City Council ('OCC') on the Oxford Local Plan 2040 ('the Submission Draft').

1 Introduction

UWL own Ruskin College and the land at Ruskin Fields, Headington.

The letter and its attachments respond to the suggested partial allocation of Ruskin Field for development in the Submission Draft Local Plan (SPE19: Ruskin Field), proposing that the extent of the allocation is extended to cover the entirety of Ruskin Fields.

In light of the extreme need for housing land in the city, all potentially suitable sites should be carefully considered. It is clear that the failure (again) to meet housing needs in the city will inflict hardship on thousands of people, whilst also directly leading to the need to release Green Belt land in less sustainable locations and increasing the need to travel.¹ There is an obligation on the Local Plan to take suitable opportunities for development within the city. In this case, however, the limited feedback given for not allocating this site is superficial – indeed the City Council's own analysis supports the allocation of the land. The Local Plan cannot be found sound in these circumstances.

UWL submitted substantial evidence to demonstrate the lack of constraints affecting the Site in response to the Preferred Options Plan, but no coherent review or response to that evidence has been produced. That evidence is submitted again with these representations and the detail of it is respectfully commended to the City Council. (Appendix 1)

¹ Or, in the alternative, those authorities relying on the revised NPPF to refuse to meet the need.





In addition, a fresh Environmental Appraisal of the land has been produced in response to the limited reasons given for not allocating the land. That appraisal shows that the environmental issues raised by consultees do not affect the land. The Environmental Appraisal is submitted as Appendix 2.

Since the Preferred Options Stage, UWL have been in discussion with the Estates team at the City Council, as the City Council owns land to the west of Ruskin Field which could be used to provide vehicular access to the land. The parties are agreed that this statement can be made in these representations:

“Oxford City Council and the University of West London are finalising an Option Agreement to secure access rights over City Council owned land linking Foxwell Drive to the Ruskin College estate. The new link will provide an alternative point of access to the College and minimise future traffic flows through Old Headington. The discussions are in the final stages with a draft Agreement circulating between the parties and their advisors. Both parties expect that the terms of the Option Agreement will be submitted for approval to proceed by the end of January 2024.”

The full extent of the land at Ruskin Fields is available, suitable and deliverable for much needed residential development.

2 Draft Allocation

The land at Ruskin Fields has been considered for development throughout the preparation of the emerging Oxford Local Plan.

OLP2040 Site assessment proforma (including Sustainability Appraisal)

Site assessments were undertaken for all the sites included as a preferred option for development in the draft Local Plan 2040 Preferred Options Document. This includes the entirety of Ruskin Field, as shown in **Figure 1**, which was assessed in a three-stage process that considered development at the site against national policy, any environment or physical constraints and local and national sustainability objectives.

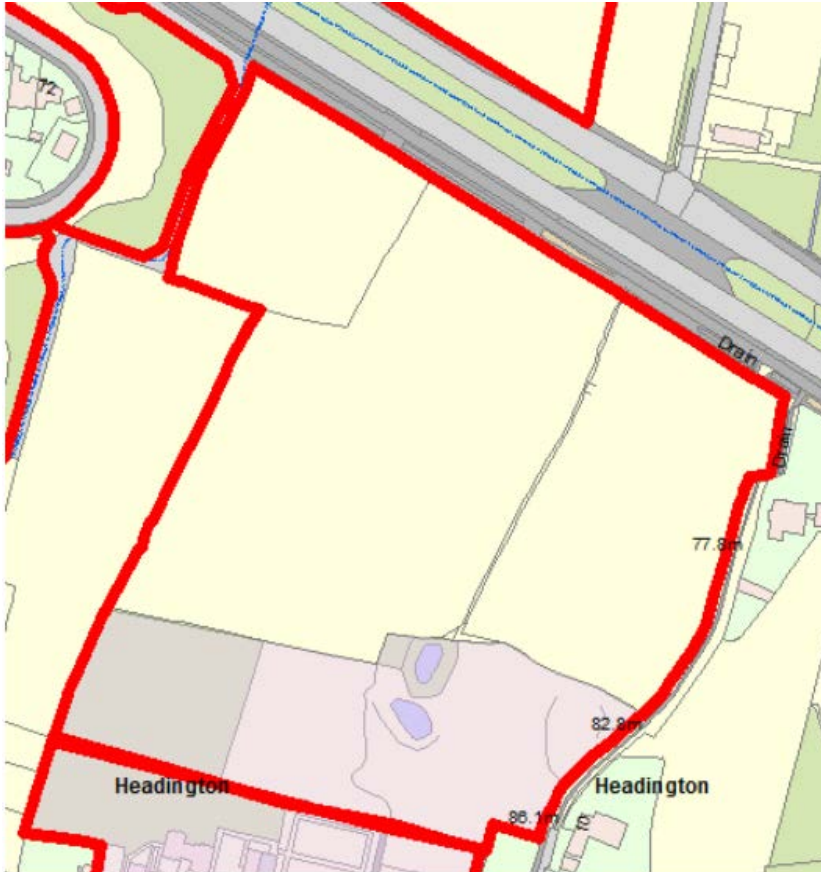


Figure 1: OLP2040 Site assessment: Ruskin Field

Stage one of the site assessment assessed the principle of development at the site against any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints. Stage one concluded that there are *"no clear conflicts with national policy or insurmountable environmental or physical constraints"* preventing development at Ruskin Field.

Stage two included a qualitative assessment of the deliverability of development at Ruskin Field alongside a Sustainability Appraisal of the site. Stage two concluded that there are limited sustainable transport connections at Ruskin Field and any new development would need to improve walking and cycling paths to enable access to bus routes. Stage two also concluded that there are *"no major heritage concerns although design sensitivity may be required as the site is within a conservation area and there is a listed wall on the boundary of the site."*

Stage two outlined that Ruskin Field scores 'fairly well' against the 11 sustainability appraisal objectives that emerged from a Sustainability Appraisal of Selected Policy Options undertaken as part of the draft local plan preparation process. Stage two therefore concluded that the potential for development at the site should be further considered in stage three of the site assessment.



Stage three consisted of a qualitative assessment of the deliverability of development at Ruskin Field and the potential sustainability impacts associated with this. Stage three concluded that the Council should consider Ruskin Field “*further for allocation for housing, subject to further information on deliverability.*”

HELAA (September, 2023)

The entirety of Ruskin Field (site 463) was assessed for its suitability for development in the Housing and Economic Land Availability Assessment (‘HELAA’) (September, 2023), as shown in **Figure 2**.

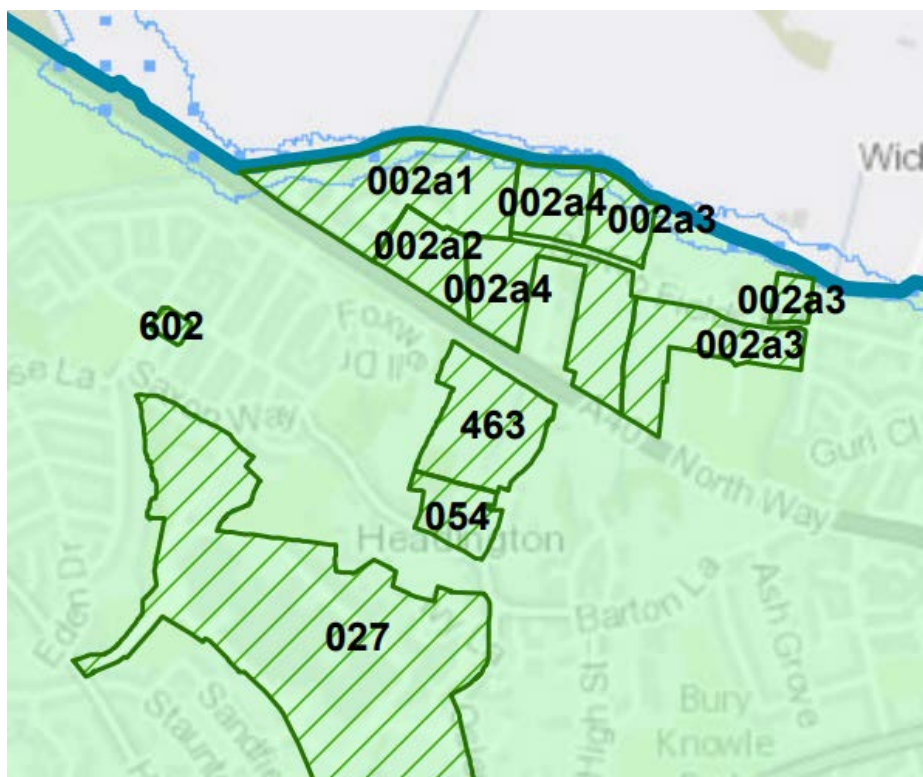


Figure 2: HELAA (September 2023) - Sites with Development Potential - Part (ii)

Within the assessment, no physical or environmental constraints were identified at Ruskin Field and it was concluded that development at the entirety of Ruskin Field is “*suitable*”, “*available*” and “*viable*.”

The HELAA (2023) accepted the potential for housing at Ruskin Field, stating that the “*site expected to be developed within the Local Plan time period.*”

Draft Allocation

Notwithstanding this background, Site Allocation SPE19 of the Submission Draft allocates only land at the southern part of Ruskin Field for the expansion of the adjoining academic institutional use and/or residential development use, which may include employer linked affordable housing or student accommodation.



The Site Plan associated with the Submission Draft Site Allocation is included for reference below at **Figure 3**.



Figure 3: SPE19: Ruskin Field

UWL believe that the entirety of Ruskin Field is appropriate for development and therefore request that the extent of Site Allocation SPE19 (Ruskin Field) is amended to include the entirety of Ruskin Field, as shown below in **Figure 4**.



Figure 4: Proposed allocation at Ruskin Field

The merits of this proposed amendment are discussed below.

Environmental constraints

The Preferred Options Consultation Report Part 1 (May 2023) sets out the consultation responses to the draft Oxford Local Plan 2040 Preferred Options document. As detailed within the Consultation Report, a limited number of comments supporting or opposing the then proposed allocation for housing at the entirety of Ruskin Field were received. A summary of the main comments received is as follows:

- Berks, Bucks & Oxon Wildlife Trust ('BBOWT') – highlighted that rare Tufa springs and associated habitats and species are very sensitive to hydrological changes which might have implications for proposed allocations at Ruskin College Campus and Ruskin Field. Also stated that Ruskin Field is carbon-rich with well-developed soil profiles that should not be disturbed to ensure no oxidation and CO2 emissions;
- University of West London – support the proposed housing allocation at Ruskin Field and detail commissioned evidence that demonstrates the sustainability of the site for development and the lack of any constraints that would justify foregoing an opportunity to contribute towards the urgent, pressing need for additional residential accommodation within the city. UWL also highlighted an initial feasibility study which demonstrates the capacity for the site to deliver between 200 and 300 dwellings. That number of houses



would allow a green swathe of land to be left undeveloped through the middle of the land, connecting Dunstan Park with Stoke Place ;

- Historic England – object to the detail of the allocation but only because they are the looking for the policy to state that careful design must ensure that development proposals contribute to the character of the Conservation Area;
- Unknown consultee – states that the Old Headington Conservation Area Appraisal considers Ruskin Field as a positive attribute of Old Headington; and
- Unknown consultee – highlights that the previous proposed allocation of Ruskin Field for residential development as part of the Barton Area Action Plan adoption process was rejected, therefore the whole field should not be allocated in the Oxford Local Plan 2040.

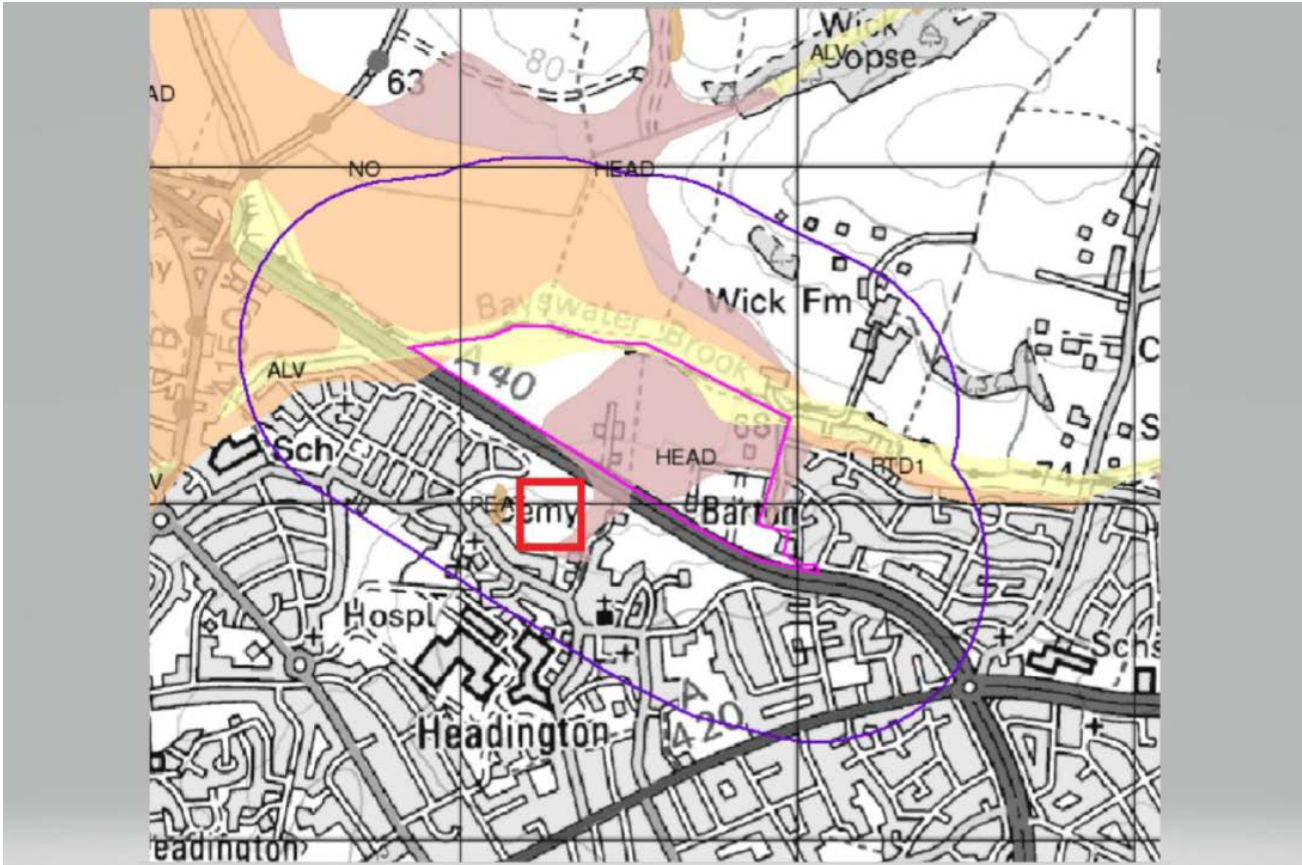
As shown above, in their response, the BBOWT state that rare Tufa springs and associated habitats and species are very sensitive to hydrological changes which might have implications for proposed allocations at Ruskin Field. The BBOWT also state that Ruskin Field is carbon-rich with well-developed soil profiles that should not be disturbed to ensure no oxidation and CO2 emissions.

In response to the BBOWT's comments, an Environmental Desk Based Appraisal of Land at Ruskin Fields has been undertaken by Quod (dated December 2023) (see Appendix 2) which sets out the key environmental sensitivities and whether these pose a constraint to future residential development at Ruskin Field.

As detailed in the Environmental Appraisal, according to the BGS Geology Viewer the bedrock underlying the Site comprises:

- Weymouth Member – Mudstone;
- West Walton Formation – Mudstone; and
- Temple Cowley Member – Sandstone and siltstone, interbedded.

The Environmental Appraisal references the Envirocheck Report included in the planning application for 'Land West of Barton North of A40 and South of Bayswater Brook Northern By-Pass Road' (ref. 13/01383/OUT), located to the north of the Site on the other side of the A40. This report shows that the Superficial deposits beneath the Site comprise 'Head' (clay, silt, sand and gravel), as shown below in **Figure 5**.











Map Colour	Lex Code	Rock Name	Rock Type	Min and Max Age
	ALV	Alluvium	Clay, Silt, Sand and Gravel	Flandrian - Flandrian
	NO	Northmoor Sand and Gravel Member	Sand and Gravel	Pleistocene - Pleistocene
	WV	Wolvercote Sand and Gravel Member	Sand and Gravel	Pleistocene - Pleistocene
	SURA	Summertown-Radley Sand and Gravel Member	Sand and Gravel	Pleistocene - Pleistocene
	HEAD	Head	Clay, Silt, Sand and Gravel	Quaternary - Quaternary
	PEAT	Peat	Peat	Quaternary - Quaternary
	RTD1	River Terrace Deposits, 1	Sand and Gravel	Quaternary - Quaternary
	TUFA	Tufa	Calcareous Tufa	Quaternary - Quaternary

Figure 5: Superficial Deposits Geology



The Environmental Appraisal found that there is no recorded evidence of Tufa springs and associated habitats and species or peat reserves within the site.

Whilst the site is in close proximity to recorded peat reserves at Dunstan Park, the appraisal found that that the data shows no records within the site itself.

In summary, the Environmental Appraisal identifies Ruskin Field as consisting of a series of neutral grassland field with no significant constraints to future development.

Urban design and heritage

The Submission Draft Site Allocation makes reference to Ruskin Field's location within the Old Headington Conservation Area, stating that the view from Stoke Place across Ruskin Fields to Elsfield is one of the most sensitive across and out of the Conservation Area, where development should retain views through and to the north from the buildings on the Ruskin Campus, and views through the site from the north.

In November 2022, Quod prepared representations in response to the consultation on the draft Oxford Local Plan 2040 Preferred Options Document which demonstrated the suitability and sustainability of the site for residential development (see Appendix 1).

The representations were supported by an Initial Strategy and Options Report, a Transport and Highways Report and a Heritage Report.

The Heritage Report was prepared by Donald Insall Associates (see Appendix 1) to understand the heritage sensitivity of Ruskin Field and assess if there are likely to be implications for either the conservation area or the setting of heritage assets if the site were to be allocated for development in the emerging local plan.

The Heritage Report details how there are no heritage assets on the site, although Ruskin College and its walled garden to the south, which are both Grade II listed, and the Rookery, a Grade II listed former house, fall in the vicinity of the site. Considering this, the Heritage Report acknowledges that Ruskin Field is sensitive in terms of its potential for impact on heritage assets of acknowledged importance and that design will need to be carefully addressed.

The Heritage Report concludes, however, that development could be accommodated on the site if the bulk and mass, and in particular the height, were conceived and disposed of in such a way so as to take advantage of the shelter from viewing offered by the new library and teaching accommodation which is part of Ruskin College and the large development of Barton Park north of Ruskin Field, across the A40. The Heritage Report also highlights that due to the topography, intervening buildings and vegetation, the site could be developed in such a way as to avoid harm being caused to the setting of the listed buildings which form part of Ruskin College.



The report details how the intervening development of Barton Park immediately north of Ruskin Field which comprises a 885 unit residential extension of Oxford, has changed the character of the area, so that Ruskin Field no longer forms part of a transition from the dense centre of Headington, through the campus, across open fields to open countryside, which was the character at the time of the designation of the Conservation Area. Considering this, the report concludes that it is likely that Ruskin Field could be developed in such a way that any special characteristics of the view from Elsfield would not be adversely affected and that development at the site would likely be considered as causing 'less than substantial' harm to the Conservation Area. Any harm would fall to be balanced against the considerable need for and benefits of the development of the site.

In practice, any view to or from Elsfield will be further affected by the allocation at Bayswater Brook for further development as an extension to Barton, in the South Oxfordshire Local Plan. It is also erroneous to attach any special value to the view from Elsfield, which is identified as a viewing point in the Oxford Local Plan but only as a view to the city centre, not to Headington. These matters should be assessed and acknowledged by the City Council, rather than superficially relied upon in the draft Local Plan.

The evidence does not support assertions of significant impact on the special character of the Conservation Area.

Housing need

As stated in Submission Draft Local Plan, the Government's standard methodology does not tackle the fundamental issue of Oxford's urgent need for new homes which has been driven by the city's economic dynamism, economic growth performance and its role in the regional and national economy.

To account for these exceptional circumstances in Oxford, and their impact on current and future demographic trends and market signals, the draft plan explores alternative approaches to assessing housing need, directly referencing the Housing and Employment Needs Assessment (2022) ('HENA') objective assessment of housing need in Oxford standing at 1,322 new dwellings per annum.

The HELAA (2023), which forms part of the Submission Draft Local Plan, concludes however that Oxford can facilitate only 9,612 new homes over the plan period, or 481 dwellings per annum, far less than the HENA indicates are required to meet need in the city.

It is evident that housing delivery should be maximised by the Local Plan. The NPPF (paragraph 60) urges authorities to "*meet as much of an area's identified housing need as possible.*" Against that background, the entirety of Ruskin Field is available, suitable and deliverable for much needed residential development and should be allocated for residential development as an extension to the allocation to the south.

3 Conclusion



There are no constraints affecting the appropriateness of the entirety of Ruskin Field being allocated for development; indeed, the Council's own evidence base appears to come to the same conclusion. Substantial evidence has been submitted demonstrating the suitability and deliverability of the land for development. It is not evident that the City Council has considered that evidence and the superficial reasons cited for not allocating the land in the submitted plan are unsound.

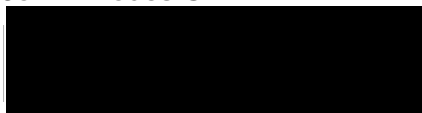
The extent of Site Allocation SPE19 (Ruskin Field) should be amended to include the entirety of Ruskin Field.

Amending the site allocation would align with the draft Local Plan's ambition of maximising housing delivery over the local plan period and would assist in meeting Oxford's evident and substantial need for new housing.

Please note that, for the reasons set out above, the University is not clear on the City Council's approach to the allocation of this site and would welcome a meeting to clarify matters.

Yours faithfully

John Rhodes OBE



Senior Director

enc.

Appendix 1 – Quod representations to the draft Oxford Local Plan 2040 Preferred Options Document (November 2022)

Appendix 2 – Environmental Desk Based Appraisal of Land at Ruskin Fields

Our ref:
Your ref:
Email: [REDACTED]
Date: 14 November 2022



Planning Policy Team
Oxford City Council

By Email planningpolicy@oxford.gov.uk

Dear Planning Policy Team

Oxford Local Plan 2040 – preferred options : consultation

This letter is submitted on behalf of the University of West London (UWL), owners of land at Ruskin College and Ruskin Fields, Headington. The letter and its attachments respond to the suggested allocation of land at Ruskin College and Ruskin Fields for development in the Preferred Options (sites 054 and 463).

This letter should be read together with our Call for Sites letter dated 17 March 2022 on the same subject, the contents of which are not repeated here.

UWL have also completed the on-line Questionnaire on the City Council's consultation portal.

The purpose of this letter is to provide 3 further documents to support the proposed allocation of the land. These are:

- Ruskin Fields, Heritage Assessment : Donald Insall Associates
- Ruskin College, Initial Strategy and Options Report, Eric Parry Architects
- Ruskin College, Transport and Highways note : i-Transport

Collectively, the documents demonstrate the suitability and sustainability of the site for residential development.

The Design Study by Eric Parry Architects should not be taken as any form of fixed proposal – rather, it explores the development potential of the land and demonstrates that it has significant capacity to support residential development for example by placing that development on the lower part of the site separated from the Ruskin Campus and the existing allocated site SP56 by a significant new area of public open space, which would extend public access from the open space immediately to the west. The work indicates that the site has capacity for c.200-300 dwellings.



The i-Transport work demonstrates that allocation of the site can meet the transport policy tests set out at paragraph 110 of the NPPF and in particular that:

- Appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location, within a ten minute walk of a regular bus service to Oxford City centre, and within a reasonable walking and cycling distance to a range of everyday education, retail, health, and leisure facilities. Opportunities exist for further enhancement to bus, walking, and cycle connections;
- Safe and suitable access to the site can be achieved for all users;
- The design of any proposals could meet the current national and local guidance; and
- The scale of the development is unlikely to have a material impact on the local highway network, with Foxwell Drive being a lightly trafficked, wide road, with good pedestrian facilities.

The land at Ruskin Fields has been considered for development through the preparation of the Local Plan 2036. At that time, the Local Plan Inspector recorded that development of Ruskin Fields could have an adverse impact on the Old Headington Conservation Area and the Elsfield View Cone. UWL have commissioned Donald Insall Associates to consider and advise on the acceptability of development of the land in this context, but also taking into account the proximity to listed buildings at Ruskin Campus. Their report is attached.

In relation to the setting of the listed buildings, the report concludes that development can be accommodated on the site without adverse impacts on the listed building and listed wall at Ruskin Campus because it is insulated from those structures by the new library and teaching accommodation at the Campus and will be further separated by development of site SP56, which is already allocated for housing or further college related development in the current Local Plan 2036.

In relation to the visibility of the land from the Elsfield View Cone, the report concludes that: the site does not lie within the cone, which is focused on the City centre, and that the site can be developed without causing harm to the designated heritage assets which comprise the historic skyline of Oxford.

Some harm would arise to the Old Headington Conservation Area. The land at Ruskin College and Ruskin Fields lies within the Conservation Area and, therefore, cannot be developed without some impact.

As the Heritage Report identifies, however, the principle of development in this location is established in the Local Plan 2036 through site allocation SP56 which allocates land for college related or residential development immediately to the north of the existing campus, i.e., closer both to the listed buildings and to the heart of the Conservation Area than the remainder of Ruskin Fields.



Since the development of the land was previously considered, the Heritage Report identifies relevant changes in circumstances, which include the development at Barton Park, immediately north of Ruskin Field across the A40. That development not only affects the view from Elsfield, it also significantly changes the character of the area so that Ruskin Fields no longer form part of a transition from the density at the centre of Headington, through the campus, across open fields to open countryside, which was the character at the time of the designation of the Conservation Area.

The Heritage Report recognises that some harm would be caused to the character of the Conservation Area through development at Ruskin Fields but any harm would be less than substantial. The degree of harm is reduced by the development already committed through Local Plan Policy SP56 and lessened by the size and overall character of the Conservation Area, the heart of which lies some distance to the south in Old Headington from which the development would not be visible.

In these circumstances, whilst careful consideration must be given to any harm to heritage assets, the relevant policy test is that set at paragraph 202 of the NPPF:-

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

The public benefits of the proposal include the provision of public access, the provision of an extensive area of extended open space but, most particularly, the contribution which the development of the site would make to urgent housing needs in Oxford. As the Preferred Options note, the scale of unmet needs in Oxford requires all land to be examined for the contribution it can make, including green field land. The site at Ruskin Fields offers a rare opportunity to meet needs in Oxford outside the Green Belt, without causing significant harm. If the allocation of the land is confirmed, it will also reduce the need to release Green Belt land elsewhere to meet the same need in a less sustainable location.

For these reasons, allocation of site is respectfully commended.

Yours faithfully,

John Rhodes
Senior Director

Enc.

RUSKIN COLLEGE

Initial Strategy and Options Report

November 2022

Eric Parry Architects

Revision & Verification Log

Revision
01

Date
11/11/22

Description
First Issue

Prepared by: Robert Dawson

Signature

Checked by: Sven Heimann



1. Introduction

Eric Parry Architects has been commissioned by the University of West London (UWL) to review strategic options for development on the Ruskin College site in Old Headington, Oxford.

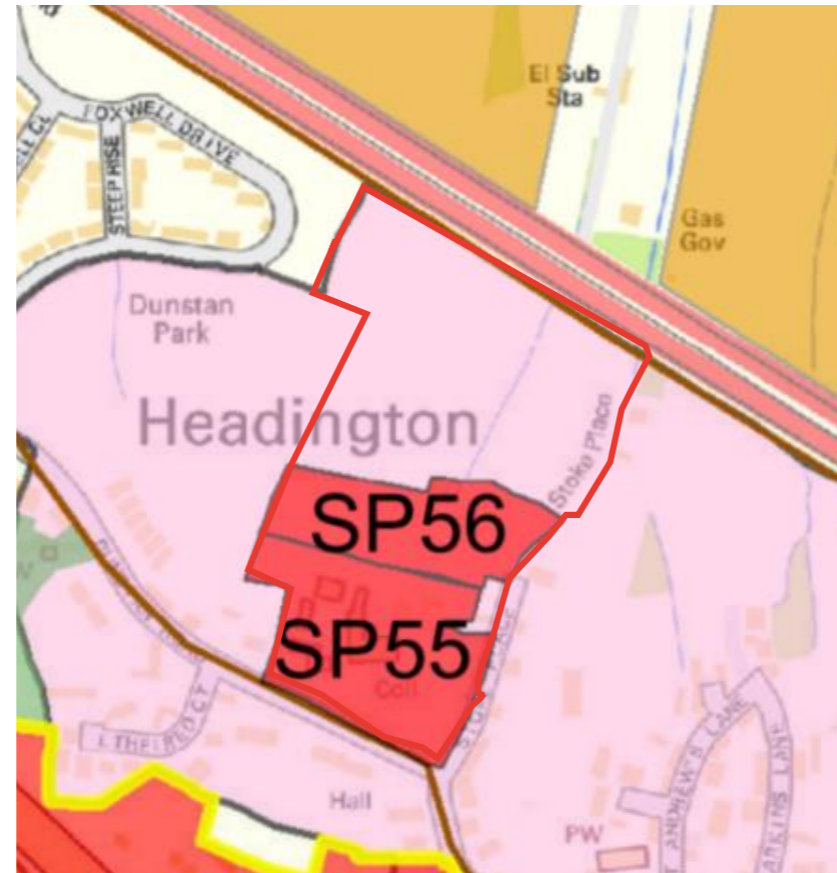
The site area under review comprises the whole of the Ruskin College site, includes the main campus defined as Zone SP55 in the Oxford Local Plan, Zone SP56, defined as Ruskin Field and the lower fields to the immediate north of this extending to the A40, which is not an allocated site. This is shown on the right.

Planning Consultant QUOD has prepared a number of separate document appraisals on the land and strategy and these should be read in conjunction with this report:

- Planning Report: Ruskin College, dated February 2022
- Planning Note: Housing Potential for Ruskin Field, dated February 2022
- Planning Note: Parking Standards, dated March 2022

The image to the top right shows how the 2015 New Barton masterplan, currently being built out, is changing the landscape and character of the area immediately north of Ruskin Fields and the A40.

The options presented herein are to promote further discussion and help test and refine a brief.



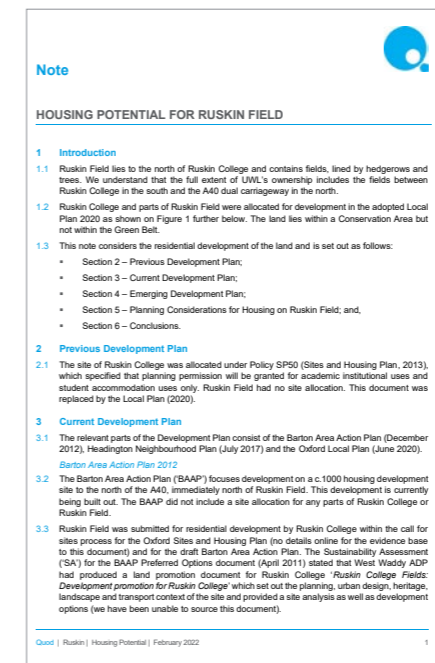
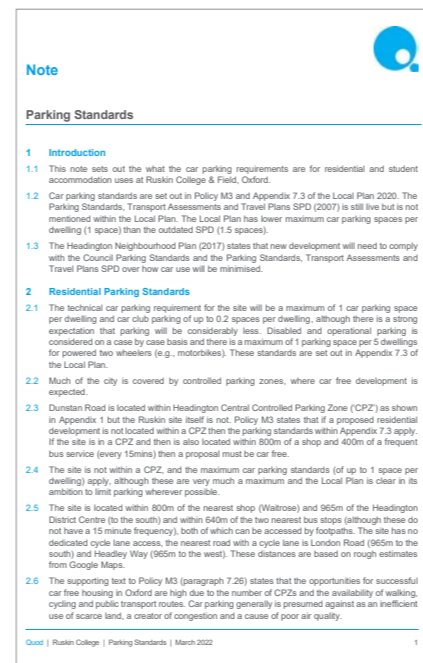
Current Planning Site Allocation



New Barton Masterplan 2015 with Ruskin Site location indicated



Quod Planning Reports, Ruskin College



2. Site Analysis and Constraints

We undertook a site review with Chris Fenner of UWL and John Rhodes of Quod on 25 February 2022. The following observations were made:

- Existing access from Dunstan Road is limited, and Stoke Place is an unadopted road with very restricted residential only access.
- There are expansive views to the north across the Ruskin Fields
- 'Old Headington' is identifiable from across the valley to the north and is separated from the New Barton development across the A40 by the Ruskin Fields
- The setting of the listed building could be improved with enhancements to the driveway and landscape within planning zone SP55
- Planning zone SP56 could be developed and potentially opened up to direct access from Dunstan Road along the west boundary to a new entrance through the historic wall
- The western accommodation blocks are dated and could be replaced with new blocks that gives improved and increased provision of accommodation and enables access to open up further development to the north
- The two areas of the site already consented for student accommodation blocks should be utilised.
- The lower Ruskin Fields are within the 'Old Headington Conservation Area' (see appendix) are not identified as a allocated zone in the local plan, but are not designated green belt.



Main Entrance from Dunstan Road



Expansive view north from the Library across the walled garden



Ruskin Hall with library extension to the right



Access from Stoke Place



View of the site of proposed / consented Building D



Existing western campus and accommodation blocks



View north across Ruskin Fields with New Barton visible



View of Ruskin Fields from the South (adjacent the A40)



View east across land SP56 with the crinkle crinkle wall to the right

3. Planning Issues

The site has a long planning history and most recently consent was renewed in 2017 for two student accommodation blocks shown on the near right image. These were part of a masterplan designed in 2011, of which only the library was implemented. The consent on these two blocks lapsed in 2021 and is currently subject to a separate renewal process by UWL to secure this potential.

Reference should be made to Quod's separate planning report for further details.

Reviewing historic and legal information on the site, it appears there is an existing covenant to the west of the site which would limit any development adjacent to this boundary. Shown on the far right it would be worth confirming this is still enforceable and whether a road in this zone is permissible.

The restricted access off Dunstan Road and Stoke Place and general historic street patterns within Old Headington, suggest that the south end of the site is best placed for 'car free' uses associated with the college, such as educational or student accommodation.

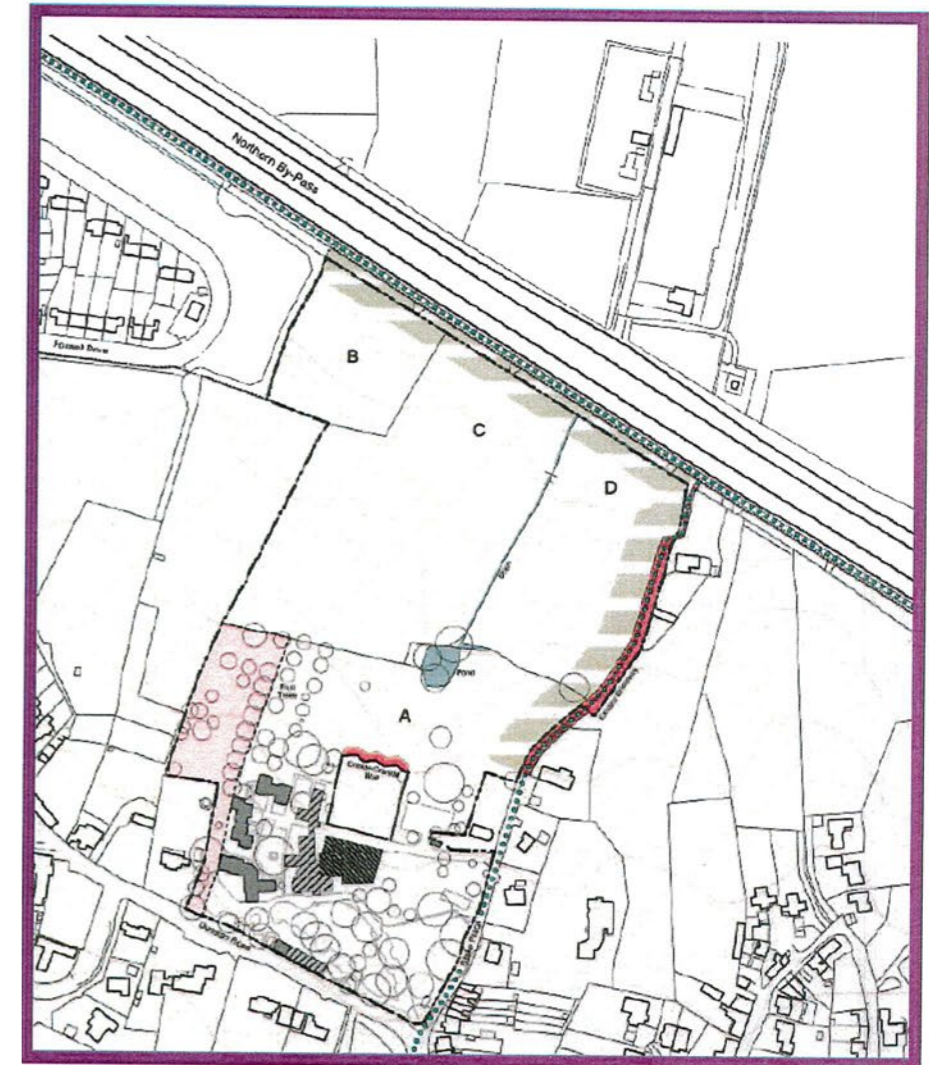
The northern end of the site, where access can be gained from the A40, via Fowell Drive lends itself to uses where limited cars are required. Connection could be made across the site from the SP56 zone, or perhaps best restricted to off Foxwell Drive only and this is reviewed later in the document.

Quod have advised that any proposals should have very limited or no parking provided for student accommodation and limited parking (25%) should be provided for residential accommodation which starts to clearly define placement of uses on the site.

A car free development would be easier to achieve and should be reviewed with a wider green transport strategy in due course.



Previously consented student accommodation blocks



Existing 'no build' covenant to the west of the site (image taken from Penoyre & Prasad)

4. Strategy and Development Zones

The diagram to the right outlines our initial thoughts on a strategy for the Ruskin Fields site and developing a narrative to respond to the context and planning sensitivities of the site:

- Introduce and define a clear visual separation - 'a green buffer' - between the heritage assets of Ruskin College and its setting in Old Headington to the south of the site and any new development to the north.
- The scale and massing of any northern field development could be aligned with the grain of the new Barton development north of the A40 rather than Old Headington.
- Introduce community / amenity use and potential benefit to Ruskin Fields as open public space including east – west pedestrian and cycleways
- Locate the 'car free' uses to the south 'Old Headington' side of the site where restrictions and traffic should be minimised due to heritage and neighbourly issues.
- Locate any potential residential uses to the north of the site where access is less restricted and traffic can be better managed.
- Avoid any additional access from Stoke Place.
- Location and connection of new education / enterprise spaces to the existing college buildings to minimise spread of more public facing uses.
- Appraise the risk vs benefit of connecting the lower fields through to Dunstan Road. If connection can be successfully negotiated from Foxwell Drive we think the planning risk of connecting through the site to Dunstan Road outweighs the potential benefits.



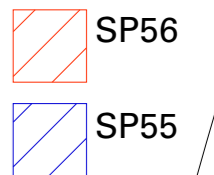
5. Existing Plan

The existing site is focussed around the Ruskin Hall and its historic walled garden which are both listed. A recent 2012 extension houses the main teaching and academic spaces, the library and a small cafe.

To the west of the site there are three older accommodation buildings, the Biko, Bowen and Beatrice Webb Buildings comprising 74 rooms which are dated.

The main approach and driveway from Dunstan Road is clockwise and one way leading to parking to the south west corner and a small stable building along the southern perimeter wall. A secondary entrance from Stoke Place leads to a second parking area immediately to the east of the walled garden

1. Grade 2 Listed Ruskin Hall
2. Grade 2 Listed Crinkle Crackle wall and garden
3. Library and teaching accommodation
4. Beatrice Webb Building - Student accommodation (28 rooms)
5. Biko Building - Student accommodation (22 rooms)
6. Bowen Building - Student accommodation (24 rooms)



1:1500 @A3

- 1 Grade 2 Ruskin Hall
- 2 Grade 2 Garden
- 3 Library and teaching accommodation
- 4 Beatrice Webb Building
- 5 Biko Building
- 6 Bowen Building

6. Option 1 Masterplan

Our initial proposal builds on the work we undertook previously, refining this to better respond to the developing brief.

This layout seeks to:

- Define two unconnected zones of development - the Ruskin College Campus to the south and a residential zone to the north.
- Maximise density of development to the north of Ruskin Fields to retain a significant green buffer to the immediate south to provide clear separation to the Ruskin Hall heritage assets
- Focus on a defined and contained residential development accessed from Foxwell Drive which could be developed in partnership with a third party
- Earmarked a green / acoustic buffer to the A40 and a new road structure that could have one or two connections back to Foxwell Drive
- Minimise planning risk and the impact of traffic on Dunstan Road and the residential areas of Old Headington, by focussing on 'car free' uses to the south
- Respond to the existing covenant to the west of the site leaving a significant unbuilt zone to the near neighbour
- Introduce a western access route to service only new development to SP55 / SP56. This could have a discrete new access from Dunstan Road or utilise the existing drive
- Maximise and define flexible 15-16m deep building footprints to the south to allow for a mix of uses (enterprise / student accommodation / academic) depending on the final brief
- Retain open space immediately to the north of the walled garden and crinkle crankle wall to minimise the impact of new development on the views back to the historic assets from the north.
- Carefully scale the massing of proposals to utilise the fall of the land and ensure that the buildings don't dominate the scale of the heritage assets
- Define a series of collegiate courtyard spaces with the buildings to create a better sense of identity to the campus
- Better landscape the entrance driveway, re-routing traffic anti-clockwise and improve the setting of Ruskin Hall in it's historic garden
- Retain the historic scale and definition of the Ruskin Field landscape through the northern development
- Ensure emergency access only from Stoke Place
- Replacement of the Beatrice Webb, Bowen and Biko Buildings



7. Option 1 - Potential Uses

To the north development zone we have defined a series of flexible residential (purple) blocks, that can accommodate a variety and mix of typologies depending on market preference.

We have indicatively shown larger four storey apartment blocks to the north to provide a scale and buffer to the main road, allowing terraces and courtyard housing to the south which can address the proposed open public space.

North south landscaped routes connect the new residential to the open green public space and retain the historic field boundaries. The landscaping of this could be developed to provide a variety of amenity and community uses.

The area of residential development is 5.86 acres / 2.37 hectares

We have shown student accommodation (yellow) largely to the defined SP56 zone, where day to day vehicle access is not required, servicing requirements are minimal and pedestrian /cycle travel is the predominant method of access

Academic / Enterprise space (blue) is indicated at the front of the site to keep to the existing access routes and ensure connection to the existing facilities.

There is flexibility to adapt and change this balance of uses depending on the viability studies of the proposals and areas defined.



8. Option 1 - Scale & Height

This scale and height of the proposals utilise the fall of the land and placement in the Ruskin Fields to the north to seek to maximise the development whilst maintaining strategic views

At the lowest point of the site to the north and also acting as a buffer to the A40 we have located the largest four storey residential blocks and as the development rises up the slope to the south these drop in scale from three to two storeys.

We have used the consented Block A and D heights of 3-4 storeys to define a basis for the massing around Ruskin Hall but then reduce this to the south west to preserve the scale of the listed building



9. Option 2 Masterplan

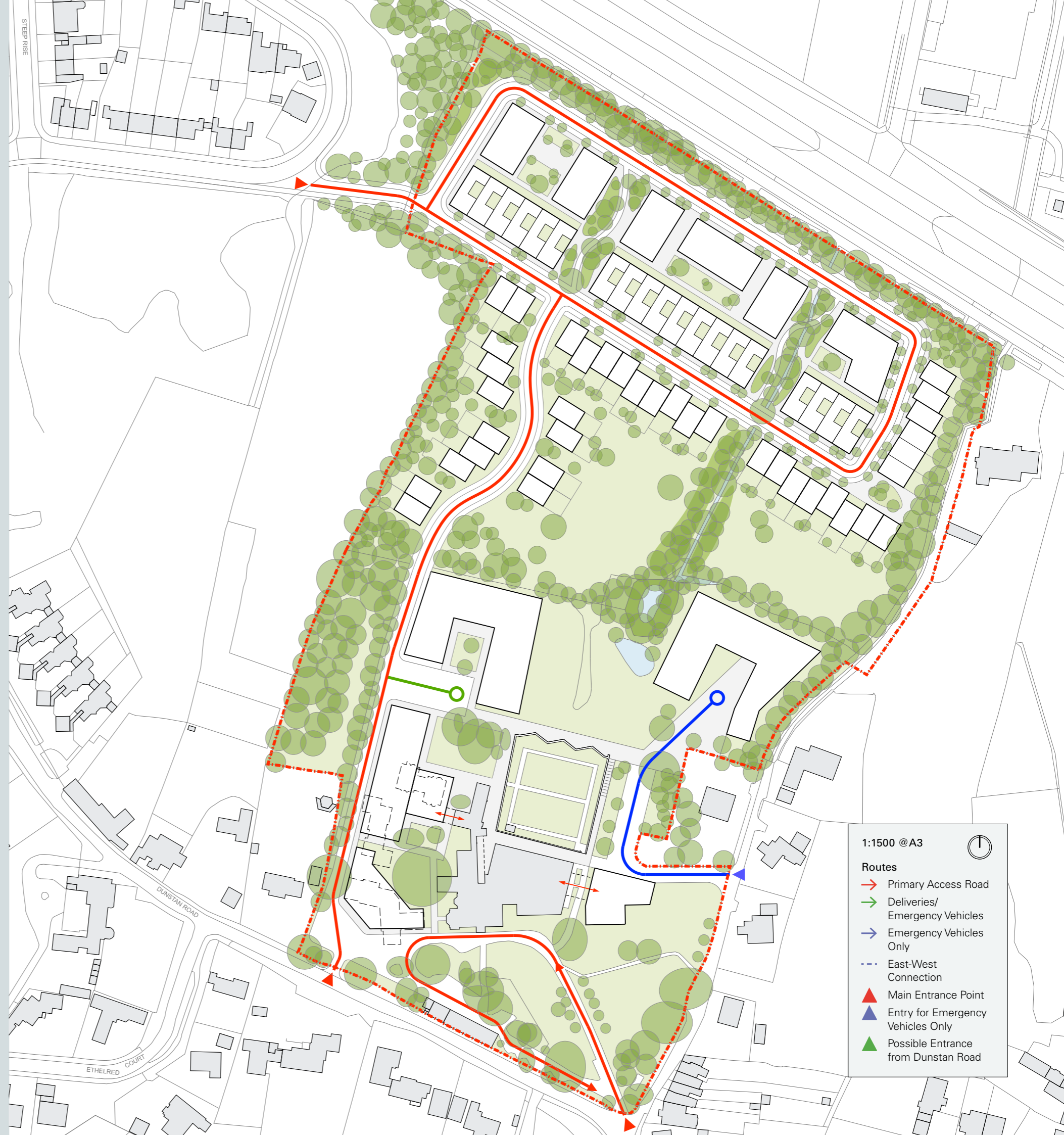
This second option retains the main principles of Option 1 but looks at providing a connection between the north and south development zones opening up access to the lower Ruskin Fields from the historic campus.

The access road to the west of the site is extended north and connects with the residential area. We have extended the residential potential north along this road and reduced the extent of the 'green buffer'.

This access road would potentially need to be upgraded to a public road with a defined junction on to Dunstan Road. There would most likely be increased planning risk adopting this.

We have indicated a single connection to Foxwell Drive on this plan, which could also be applied to Option 1.

We feel this presents more planning risk by connecting the north and south Ruskin Field zones, potentially reducing the visual separation and identity of Ruskin Hill within the Conservation Area.



10. Option 2 - Potential Uses

This follows the principles of Option 1
The area of residential development is 7 acres / 2.83 hectares



11. Option 2 - Scale & Height

This follows the principles of Option 1 with extended two storey housing to the west of the green central buffer space.



12. Phasing

Our initial appraisal of the possibilities at the Ruskin Field Site has identified that there are potentially two separate north and south development zones separately which can be independently phased

Further analysis of the planning risks should be undertaken to understand the best approach to seek approval on the site and whether an integrated and holistic outline masterplan for the whole site would be beneficial. This could involve a lengthy process and may prevent immediate and needed development on the site for income generation. To enable quicker development on the site, it may be beneficial to split the site into two independently phased masterplans:

Phase 1 - Short to Medium Term

- A short -medium term phase allows development to SP55 / SP56 planning zones aligning to the local plan for educational use, student accommodation and/or associated housing
- Depending on the immediate need, short term aspirations and viability this could favour either enterprise space or student accommodation first and be completed with improvements to the landscaping and setting of the listed building
- If Option 2 is favoured, then the infrastructure and road access for the lower fields would be implemented as part of this phase to enable follow on activity to the north

Phase 2 - Long Term

- A longer term plan of opening up the lower fields for residential development
- Quod has identified that this is outside the local plan development zones and would involve a longer planning process and consultation
- This may need adoption of the proposals in the local plan through the 'call for sites' process to enable Oxford to meet its housing need
- Access for development would be via Foxwell Drive and/or via the new route of Option 2 from Dunstan Road

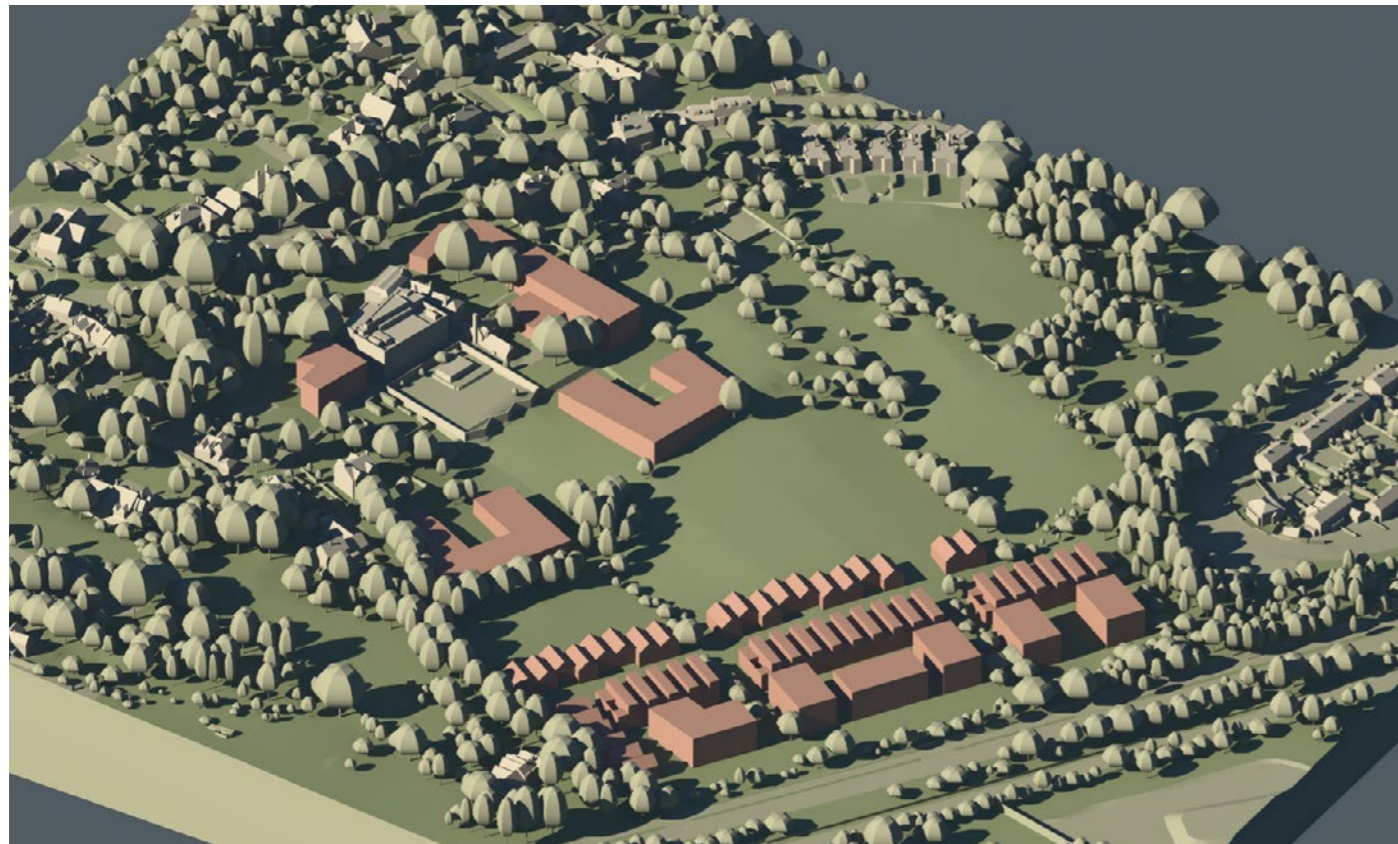


Short - Medium Term Phase 1



Long Term Phase 2

13. Option 1 Areas



Area Schedule - Masterplan Option 1 - Additional New Build GEA Area only

Phase 1

Phase 2

New Build By Use	Academic			
	Enterprise / Academic		Student Living	
	m ²	ft ²	m ²	ft ²
	3,225	34,714	10,395	111,891

Residential					
Apartment Buildings		Court Yard Houses		Garden Houses	
m ²	ft ²	m ²	ft ²	m ²	ft ²
9,735	104,787	8,205	88,318	4,800	51,667

Existing Demolition	Enterprise / Academic		Student Living	
	m ²	ft ²	m ²	ft ²
Beatrice Webb	0	0	-552	-5,942
Biko	0	0	-447	-4,811
Bowen	0	0	-514	-5,533
Demolition Total	0	0	-1513	-16,286

Residential	
m ²	ft ²
0	0
0	0
0	0
0	0

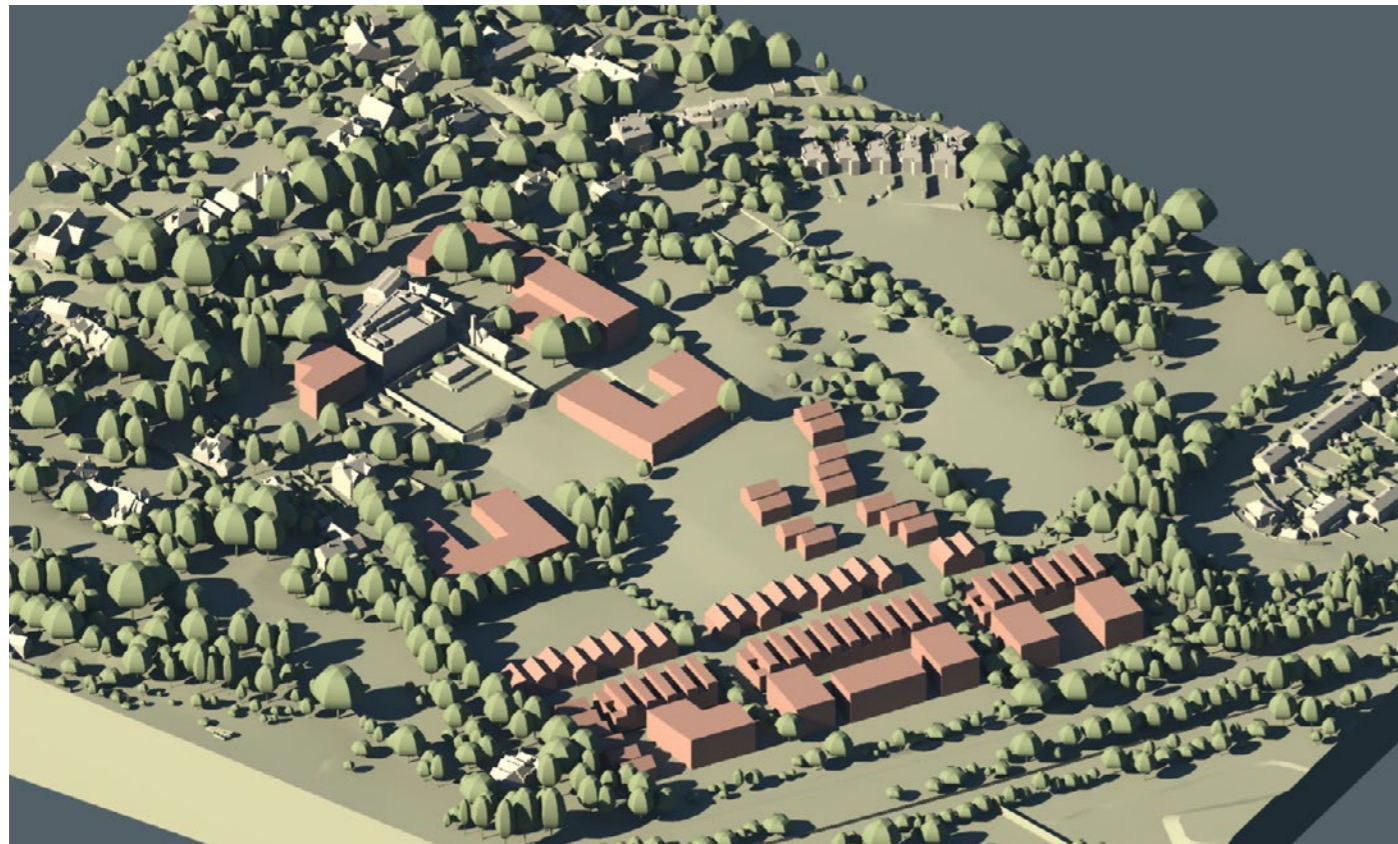
Total overall	Enterprise / Academic		Student Living	
	m ²	ft ²	m ²	ft ²
	3,225	34,714	8,882	95,606

Residential	
m ²	ft ²
22,740	244,771

Phase 1 & 2 Combined	
m ²	ft ²
34,847	375,093

Areas exclude the existing Ruskin Hall, teaching accommodation and Smith House

14. Option 2 Areas



Area Schedule - Masterplan Option 2 - Additional New Build GEA Area only

Phase 1

New Build by Use	Academic			
	Enterprise / Academic		Student Living	
	m ²	ft ²	m ²	ft ²
	3,225	34,714	10,395	111,891

Existing Demolition	Enterprise / Academic		Student Living	
	m ²	ft ²	m ²	ft ²
Beatrice Webb	0	0	-552	-5,942
Biko	0	0	-447	-4,811
Bowen	0	0	-514	-5,533
Demolition Total	0	0	-1513	-16,286

Total overall	Enterprise / Academic		Student Living	
	m ²	ft ²	m ²	ft ²
	3,225	34,714	8,882	95,606

Phase 2

Residential					
Apartment Buildings		Court Yard Houses		Garden Houses	
m ²	ft ²	m ²	ft ²	m ²	ft ²
9,735	104,787	8,205	88,318	7,100	76,424

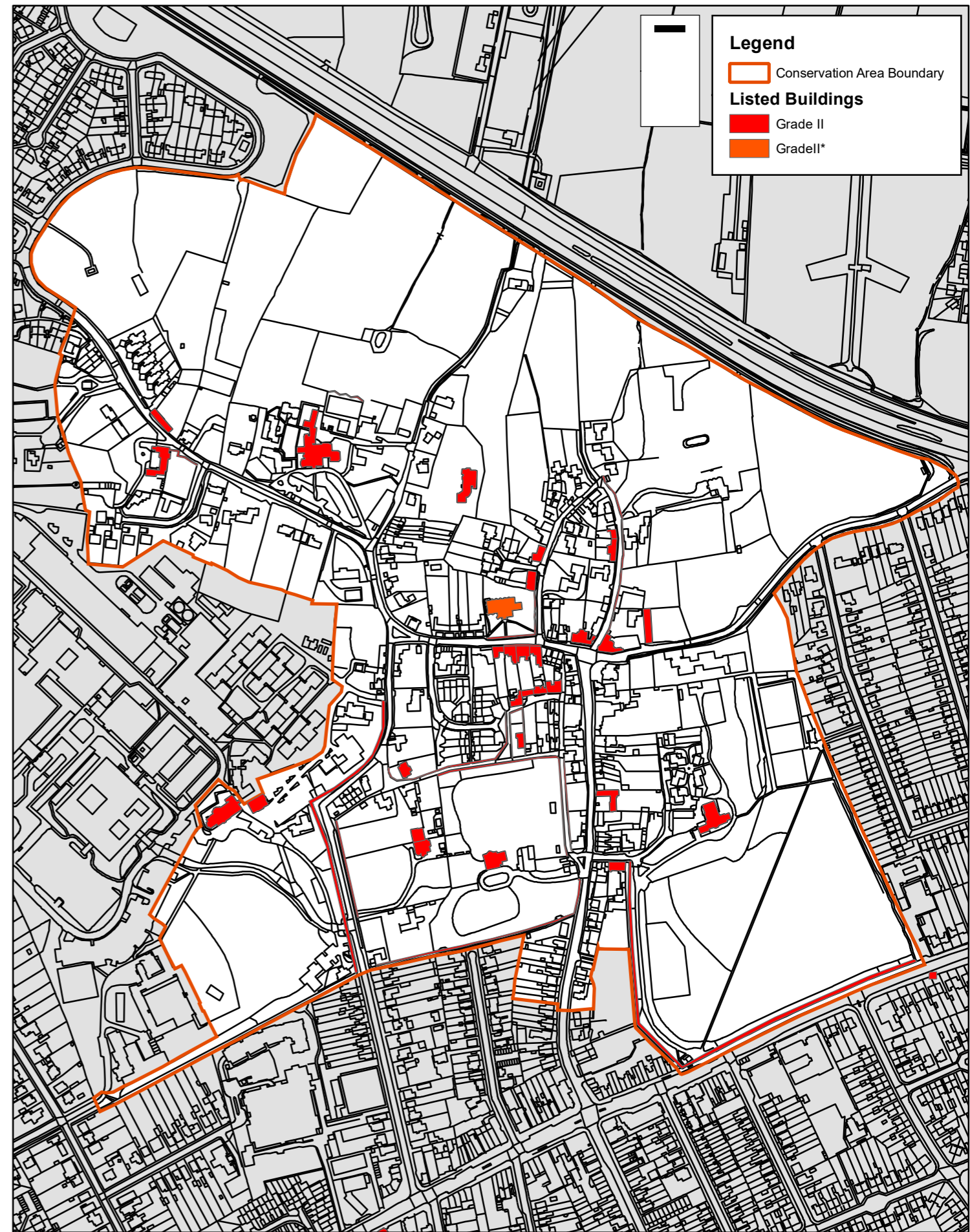
Residential	
m ²	ft ²
0	0
0	0
0	0
0	0

Residential	
m ²	ft ²
25,040	269,531

Phase 1 & 2 Combined	
m ²	ft ²
37,147	399,850

Areas exclude the existing Ruskin Hall, teaching accommodation and Smith House

Appendix 1 Old Headington Conservation Area Map



Map 1 Old Headington Conservation Area

Scale: 1:4,900

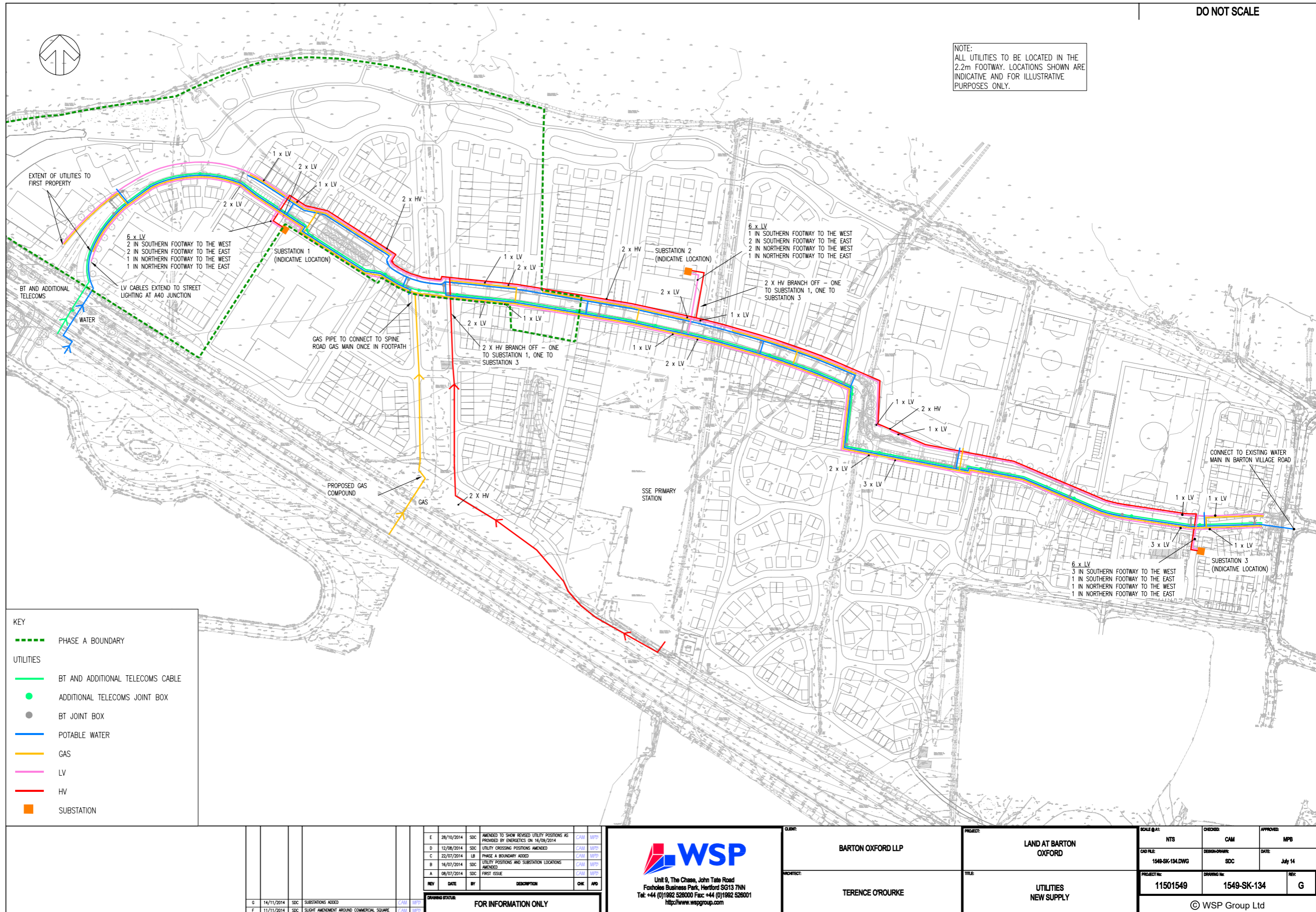
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Appendix 2 Indicative Barton Masterplan (planning portal 13/01383/OUT)



Appendix 3 SSE Primary Substation design (planning portal 14/03201/RES)



Technical Note

Project No: [REDACTED]
Project Title: Ruskin Field, Oxford
Title: Transport and Highways Reps
Ref: [REDACTED]
Date: 14 November 2022

SECTION 1 INTRODUCTION

1.1 Overview and Background

- 1.1.1** This Technical Note has been prepared on behalf of the University of West London by i-Transport LLP to identify appropriate access opportunities and review sustainability credentials for a residential development or additional student accommodation buildings at the land at Ruskin Field, Oxford.
- 1.1.2** The site comprises three open, green space / college fields (of approximately 4.5ha), and is located to the north-east of Oxford City centre. The site is broadly bound by the A40 to the north, Stoke Place to the east, Ruskin College to the south, and Dunstan Park/Foxwell Drive to the west. It has a simple five bar gate farm access to the A40 in proximity with Stoke Place. Other links are via the main Ruskin College Campus, which itself has a main vehicular access to Dunstan Road (at the junction with Stoke Place), and a secondary access to Stoke Place.
- 1.1.3** The site is located within the planning jurisdiction of Oxford City Council (OCC), with Oxfordshire County Council (OxCC) the local highway authority.
- 1.1.4** This note provides a brief summary of the site's accessibility options in the context of the emerging local plan allocation. It considers the accessibility of the site location with an overview of the nearby key local facilities and services, provides an estimate of the potential number of multi-modal trips which could be generated by the emerging proposals is set out, and the ability of the local transport network to accommodate these trips is reviewed.
- 1.1.5** Fundamentally, this note will set out the extent to which a development in the proposed location accords with the four transport and highways tests of National Planning Policy Framework (NPPF) paragraph 110. This states;

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- ***appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;***
- ***safe and suitable access to the site can be achieved for all users;***
- ***the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and***
- ***any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."***

1.1.6 Paragraph 111 of the NPPF states, "***Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"***."

1.2 Draft Local Plan

1.2.1 The new Oxford Local Plan 2040 is currently being developed. OCC is in the second stage (Regulation 18) of the public consultation in seeking comments on the Preferred Options document. As part of this stage, OCC is welcoming comments on the Call for Sites, including the submission of potential development sites for a wide range of uses.

1.2.2 This Ruskin Field site is referenced in the Housing and Economic Land Availability Assessment (HELAA) as site 463 and within the Preferred Options as a site in the East Area Outside the Area of Focus.

1.2.3 The HELAA Stage 3 assessment of Ruskin Field states it should be taken forward to be considered "***further for allocation for housing, subject to further information on deliverability"***."

1.3 Proposed Site Use

1.3.1 It is proposed that the site could be suitable to provide 200 new dwellings. This would most likely be in the form of traditional dwellings (flatted and houses), but potentially for student accommodation.

1.3.2 The site is bound on three sides by the local highway network. The A40 is to the north, Dunstan Road is to the south (via the main college campus), and Foxwell Drive is to the west. All the roads are adopted highway maintained by OxCC. Ruskin College has an existing site access from Dunstan Road which access for all users is taken. A Public Right of Way (Bridleway) - Stoke Place - forms the site's eastern boundary.

1.3.3 Foxwell Drive is a wide residential road (approximately 6.0m) subject a 20mph speed limit. There are no traffic calming measures to support the 20mph restriction. It is subject to a Controlled Parking Zone (CPZ) restricting on-street parking to permit holders only (zone NW) between 9am-5pm Monday to Friday. Site observations recorded that most cars are parked off-street on private drives. i-Transport Drawing ITL18383-GA-002 shows a simple priority junction with design features of:

- 5.0m wide carriageway for the site access arm;
- 6m radii on the northern and the southern sides;
- 2m footways to connect to the existing pedestrian network; and
- 2.4m x 25m visibility splay to the north and south, in accordance with Manual for Streets (MfS) for a 20mph road.

1.3.4 The type of vehicular access could easily accommodate the proposed levels of development.

1.3.5 A topographical and arboricultural survey would need to be undertaken to design a route which takes account of the trees between the site and Foxwell Drive.

1.3.6 Additional pedestrian and cycle access should be provided to connect to the existing pedestrian and cycle facility that routes along the western side of the A40 adjacent to the site, and towards Stoke Place to the east (either direct or via the connection to the shared pedestrian/cycle lane along the A40) for enhanced active modes connectivity.

SECTION 2 EXISTING CONDITIONS

Walking and Cycling

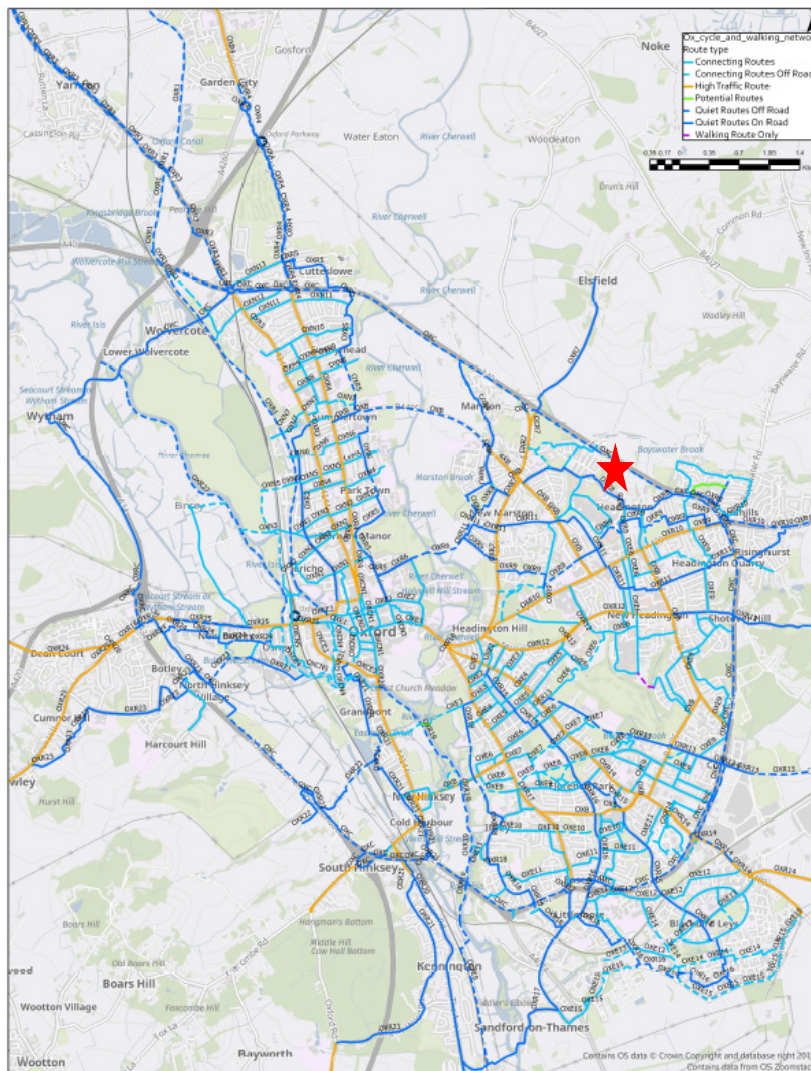
2.1.1 Walking facilities locally are good with continuous footway access to key locations such as the hospital and the local services and facilities in the Headington district centre on London Road, as well as local bus stops.

2.1.2 Towards the north of the site, Foxwell Drive has continuous footways provided on both sides of the carriageway. These footways benefit from regular street lighting and occasional dropped kerbs, to help facilitate crossing of side access roads.

2.1.3 Along the southern side of the A40 (directly adjacent to the site), a wide (circa 5.0m) off-carriageway shared foot/cycle lane is provided, enabling a safe and direct route, particular for cyclists, along the northern bypass, to connect to other dedicated radial cycle routes in and out of the city.

- 2.1.4 Dunstan Road provides east to west access, bordering the southern frontage of Ruskin College. The site provides a circa 2m wide footway along its northern side for its entirety until the mini roundabout between Foxwell Drive / Dunstan Road / Saxon Way and continues along these roads. The footway also benefits from regular street lighting and dropped kerbs.
- 2.1.5 The High Street on London Road can easily and safely be accessed by the continuous footways provided along St Andrew's Road and Old High Street.
- 2.1.6 A Public Right of Way (PRoW) byway (320/55/10) and bridleway (320/56/10) currently run along the eastern site frontage via Stoke Place. The byway goes from the priority junction of Dunstan Road / Stoke Place / St Andrew's Road for circa 210m before transitioning into the bridleway which continues for a further 140m to the A40.
- 2.1.7 The Oxford Local Cycling and Walking Infrastructure Plan (LCWIP) highlights a number of quiet routes with on-road and off-road infrastructure. Oxford Cycle and Walking Network for LCWIP map has been reproduced at Image 2.1.

Image 2.1: Oxford Cycle and Walking Network for LCWIP



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Source: Oxford City Council

2.1.8 The residential nature of the roads within the vicinity of the site provides a safe environment for cyclists to share the carriageway with other vehicles. There are also local cycling routes near the site, consisting of the route 'NE' which travels north south from the A40 to the Centre of Oxford, most easily accessible at the junction of St Andrew's Road / Osler Road, 280m south of the site.

Public Transport

2.1.9 The nearest bus stops are on Halliday Hill approximately 400m (or some 5-minute walk) from the site's northern access onto Foxwell Drive, or Saffron Way (circa 600m). The former is served by bus route 13 (and the X3 City in evening) and later is served by the X3 City); these link Barton and the site to Abingdon, via Oxford City centre. Both provide three services an hour Monday-Friday, three buses per hour on Saturdays and two per hour on Sundays. The X3 City directly passes the site on Foxwell Drive.

2.1.10 There are also bus stops located on London Road, circa 900m (or just over 10 minutes walk) south of the site's southern boundary via Stoke Place. These bus stops have 14 services running through them, the most regular services being the 8, 280 and 400 which alone provide up to 14 buses per hour Monday – Friday, up to 12 buses per hour on Saturdays and up to eight buses on a Sunday. The three services provide access to Oxford City Centre in addition to Aylesbury, Wheatley and Barton. There are also two night buses, with the last bus arriving at 02:50 on both Saturday and Sundays.

2.1.11 Oxford railway station is located approximately 5km south west of the site. The station is served by the GWR, Chiltern Railways and CrossCountry, with trains to key locations such as London Paddington, London Marylebone, Reading, Manchester Piccadilly and Bournemouth. There are up to 4 trains per hour to London and is linked via all of the site's buses.

Local Services and Facilities

2.1.12 Headington is the local district centre which provides a good range of retail, health, education, employment and leisure services. The high street is located around 800m-1km to the south of the site (equivalent to a 10 to 15 minutes walk).

2.1.13 Oxford City centre provides a significant number of facilities and services, with a range of retail, health, education, employment, and leisure services. The city centre is predominantly pedestrianised and located around 4.3km southwest of the site (equivalent to a circa 15 minutes cycle). It is also accessible via the frequent local bus services.

2.2 Summary

2.2.1 The site's location is ideally suited to meet the first test of the NPPF, in that appropriate opportunities to promote sustainable transport modes can be taken up. This includes the opportunity provided to enhance walking, cycling and public transport (bus) connectivity.

SECTION 3 TRIP GENERATION

3.1 Multi-modal Trip Generation

3.1.1 To determine the potential impact of development of the site on the wider highway network, the development related transport trips on the local transport network have been assessed. The TRICS database has been used to derive comparable sites of 'privately-owned houses and flats' in England (excluding Greater London) as well as comparable 'student accommodation' sites to provide an assessment of the development.

3.1.2 The resulting trip rates have been used to calculate the expected trip generation for:

- 200 of residential units; or
- 200 student accommodation units.

3.1.3 A summary of the expected residential, student accommodation trip rates and trip generation for the proposed development in the morning peak hour is provided in Table 3.1.

Table 3.1: Proposed Development Traffic Generation – Morning Peak Hour (08:00-09:00)

	Two-Way Trips					
	Vehicles	Passenger	Cyclists	Pedestrians	Public Transport	Total People
Residential Element						
Trip Rate (per unit)	0.432	0.200	0.035	0.155	0.031	0.854
Trip Generation (200 units)	86	40	7	31	6	171
Student Accommodation						
Trip Rate (per unit)	0.011	0.000	0.004	0.124	0.028	0.167
Trip Generation (200 units)	2	0	1	25	6	33

Source: TRICS

3.1.4 Table 3.1 shows that the proposed development would be expected to generate a total of 86 two-way vehicle trips in the morning peak hour with a residential development. This would be the equivalent to just over an additional one vehicle per minute on the local highway. It shows that a proposed residential development would be expected to generate a total of 171 two-way total person trips in the morning peak. The majority of these trips would be vehicular trips (86), with a small share of pedestrian trips (31), public transport (6) and cycling trips (7).

3.1.5 A student accommodation development would result in fewer person trips, 33 compared to 171. It should be noted that the majority of student accommodation trips would be expected to be walking, cycling or public transport. A student accommodation development would be expected to generate 2 two-way trips in the morning peak hour.

3.1.6 A summary of the expected residential, student accommodation trip rates and trip generation for the proposed development in the evening peak hour is provided in Table 3.2.

Table 3.2: Proposed Development Traffic Generation – Evening Peak Hour (17:00-18:00)

	Two-Way Trips					
	Vehicles	Passenger	Cyclists	Pedestrians	Public Transport	Total People
Residential Element						
Trip Rate (per unit)	0.457	0.170	0.021	0.159	0.018	0.825
Trip Generation (200 units)	91	40	4	32	4	165
Student Accommodation						
Trip Rate (per unit)	0.012	0.003	0.004	0.206	0.059	0.284
Trip Generation (200 units)	2	1	1	41	12	57

Source: TRICS

3.1.7 Table 3.2 shows that the proposed development would be expected to generate a total of 91 two-way vehicle trips in the morning peak hour with a residential development. This would be the equivalent to an additional one to two vehicles per minute on the local highway. It shows that a proposed residential development would be expected to generate a total of 165 two-way total person trips in the evening peak. The majority of these trips would be vehicular trips (91), with a smaller share of walking trips (41), public transport (12) and cycling trips (1).

3.1.8 A student accommodation development would result in a great number of person trips, 57 compared to 165. It should be noted that the majority of student accommodation trips would be expected to be walking, cycling or public transport. A student accommodation development would be expected to generate 2 two-way trips in the evening peak hour.

3.1.9 Both proposed development options would be expected to result in a minimal impact on the local transport network. A residential development would have a relatively higher number of cars, however, the development would still be expected to result in approximately one to two additional vehicles on the highway network in both the morning and evening peak hours.

3.2 Car Parking

3.2.1 The Oxford Local Plan 2036 was adopted in June 2020. Policy M3: Motor Vehicle Parking states that planning permission will only be granted residential development that is car-free in Controlled Parking Zones (CPZ) where a site is located within 400m of a frequent public transport service and 800m to local services (i.e. a supermarket). The maximum vehicular parking standards for sites outside these criteria is 1 per space per dwelling and 1 car club space per 0.2 dwellings.

- 3.2.2 The need for disabled parking and car clubs must be considered in all residential developments.
- 3.2.3 For student accommodation, there is a maximum of 0 (zero) car parking spaces per resident room, with operational parking and disabled parking considered on a case-by-case basis.
- 3.2.4 As demonstrated within this report, the site is on the cusp of meeting the current car free requirements. It is within a CPZ, is just beyond 400m from a frequent (three per hour) bus service (on Halliday Hill via Foxwell Drive), and just beyond 800m from local services. However, a further bus service routes past the site (Route X3 City) without stopping on Foxwell Drive, but there is scope to introduce a new bus stop to enable this additional connection. In addition, the large range of services available within Headington (including four different supermarket brands from Co-Op, Waitrose, Iceland, and Tesco) ensures that the quality of provision more than compensates for the very short additional distance beyond the recommended 800m.
- 3.2.5 Therefore, there is scope for the site to be delivered as a car-free development, in accordance with overarching policy guidance and direction of travel of OCC objectives. This would reduce the scale of the site access junction proposal, as it would only need to serve blue badge parking, and allow access for refuse collection and deliveries, as well as emergency vehicles.

3.3 **Summary**

- 3.3.1 On the basis of the above, occupancy of the site can also meet the fourth test in paragraph 110 of the NPPF, in that the level of development, whether residential or student accommodation is unlikely to be of a scale that will require significant enhancement or improvements on the local networks for highways safety or capacity reasons.

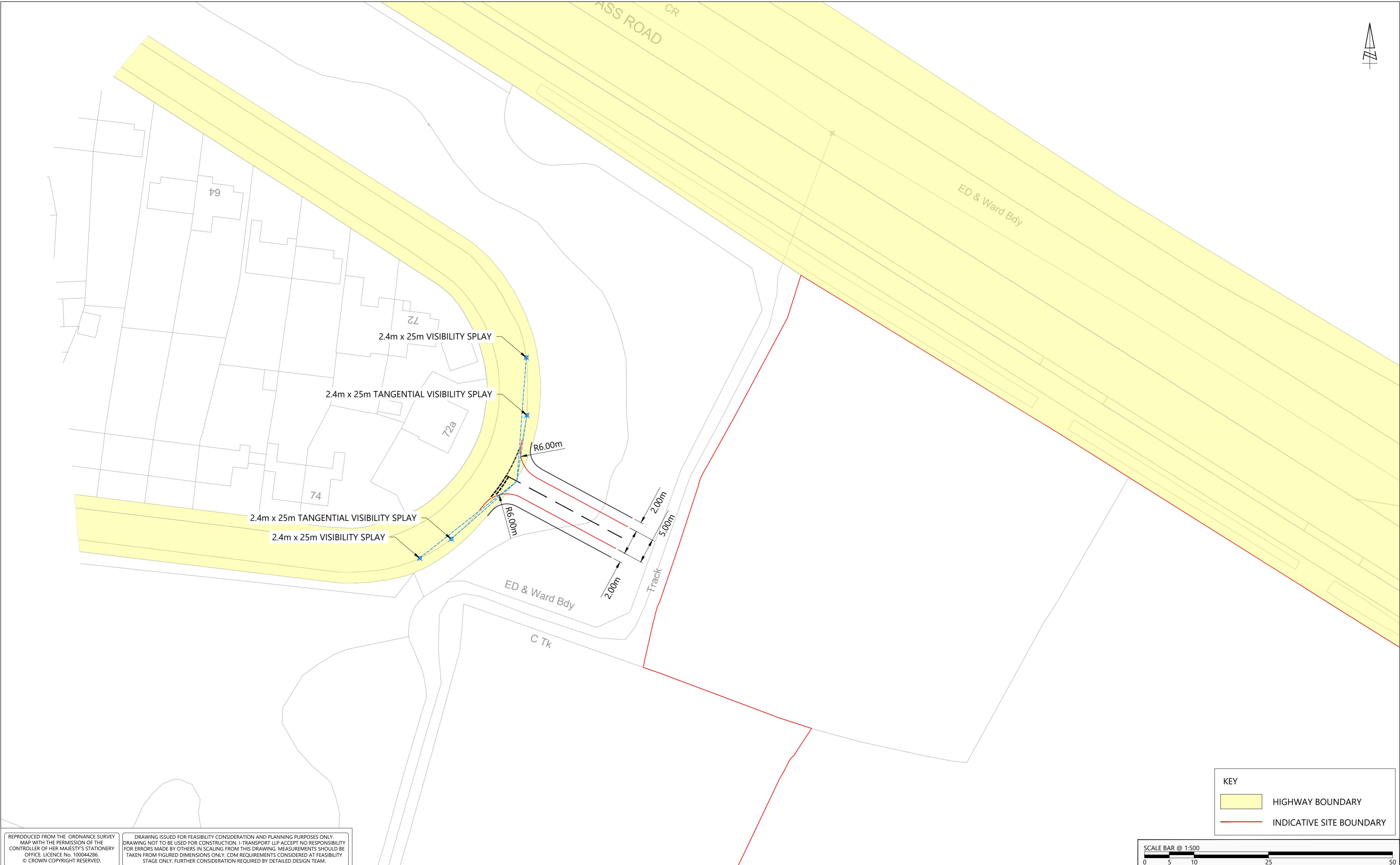
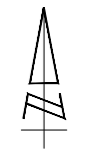
SECTION 4 SUMMARY AND CONCLUSION

- 4.1.1 On the basis of all of the above, it is determined the site can fully addresses the four tests of paragraph 110 of the NPPF that local authorities need to consider when determining whether a site is suitable for allocation, in that:
- Appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location, within a ten minute walk of a regular bus service to Oxford City centre, and within a reasonable walking and cycling distance to a range of everyday education, retail, health, and leisure facilities. Opportunities exist for further enhancement to bus, walking, and cycle connections;
 - Safe and suitable access to the site can be achieved for all users;
 - The design of any proposals could meet the current national and local guidance; and

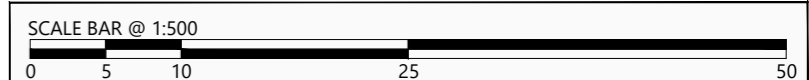
- The scale of the development is unlikely to have a material impact on the local highway network, with Foxwell Drive being a lightly trafficked, wide road, with good pedestrian facilities.

4.1.2 In conclusion, it is there are feasible access options to serve the future redevelopment at Ruskin Field for residential uses. Any future planning application would need to satisfy the tests of NPPF paragraph 110 through preparation of a detailed Transport Assessment.

DRAWINGS



KEY	
	HIGHWAY BOUNDARY
	INDICATIVE SITE BOUNDARY



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85 Gresham Street, EC2V 7NQ Tel: 020 3705 9215
www.i-transport.co.uk

REV	DATE	BY	DESCRIPTION	CHK	APP

STATUS: FOR INFORMATION

TITLE: FOXWELL DRIVE ACCESS
PROJECT: RUSKIN FIELDS, OXFORD

CLIENT: UNIVERSITY OF WEST LONDON

DRAWN: JMc	CHECKED: PR	APPROVED: NM
PROJECT No: ITL18383	SCALE @ A2: 1:500	DATE: 09.11.22
DRAWING No: ITL18383-GA-002		REV:

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Donald Insall Associates
Chartered Architects and Historic Building Consultants

**Ruskin Fields, Land to the North of Ruskin College,
Dunstan Road, Old Headington, Oxford OX3 9BZ**

Initial Assessment of Heritage Impacts
For University of West London

November 2022



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Contact information



Oxford Office



OX1 4BX

www.donaldinsallassociates.co.uk

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1.0 Scope of Report and Instructions

1.1 Introduction

Donald Insall Associates was commissioned by The University of West London in November 2022 to assist them in understanding the heritage sensitivities of a site in Headington, Oxford. The site, known as Ruskin Fields, is located to the north of Ruskin College and the south of the A40. The site is rectangular in shape and extends to approximately 4.5 ha, bounded by mature hedges. It is currently under pasture and is within the designated Headington Conservation Area. There are no heritage assets on the site, but Ruskin College and its walled garden to the south are both listed at Grade II. We have been asked to consider whether there are likely to be implications for either the conservation area or the setting of heritage assets if the site were to be allocated for development in the emerging local plan.

We have reviewed the information which has been sent to us by Quod, carried out a site walkover (including a consideration of the site from Elsfield village to the north), and identified and assessed the heritage assets in the vicinity. We have not carried out any primary research into the history of the site, but have had access to the helpful Heritage Statement by Asset Heritage Consulting dated April 2022 in respect of development adjacent to Ruskin College/ The Rookery. This is therefore a high-level assessment of the potential impact of development on this site on heritage assets to assist with the evidence base for deciding whether to include the site for allocation.

1.2 The Site, its Legal Status and the Policy Context

The site known as Ruskin Fields is located on the northern edge of the Old Headington Conservation Area in the planning jurisdiction of Oxford City Council. It is bounded to the north by the A40, which also acts as the boundary between Oxford City Council and South Oxfordshire District Council. Whilst there are a number of listed buildings within 1km, there are only two which are in the vicinity of the site and these are: Ruskin College/ The Rookery (a Grade II listed former house) and the walled garden which is part of this and which has a distinctive crinkle-crinkle northern wall (also listed Grade II). There is a protected view from Elsfield to the north, looking south towards the 'dreaming spires'.

The site of Ruskin College, including the two listed buildings identified above, and the paddock immediately to the north are already allocated in the current local plan for development under policies SP55 and SP66. However, in 2020, the Planning Inspector's Report into the Local Plan found that whilst development on the southern part of the site (the area within Policy SP55) would not have an adverse effect on the significance of the Conservation Area or heritage assets development on the northern part of Ruskin Field "could have an adverse impact on the Old Headington Conservation Area and the Elsfield View Cone" and as a result it was not allocated. We have been asked to consider whether any material change in circumstances since that decision was made might indicate that this site could now be allocated and developed without causing harm to heritage assets.

The statutory list description of the listed buildings is included in Appendix I and a summary of guidance on the Old Headington Conservation Area provided by the local planning authority is in Appendix II.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to conservation areas, that *'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'*.

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2021 will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). At the heart of the Framework is *'a presumption in favour of sustainable development'* and there are also specific policies relating to the historic environment. The Framework states that heritage assets are *'an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'*. The Glossary to the National Planning Policy Framework defines a heritage asset as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Framework, in paragraph 194, states that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

The Framework also, in paragraph 199, requires that:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 200 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

The Framework requires that local planning authorities categorise harm as either 'substantial' or 'less than substantial'. Where a proposed development will lead to 'substantial harm to (or total loss of significance of) a designated heritage asset', the Framework states, in paragraph 201, that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use*

Guidance on the meaning of 'substantial harm' is given in paragraph 18 of the National Planning Practice Guidance (2019), as follows:

In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

Where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, the Framework states, in paragraph 202, that:

...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas to enhance or better reveal their significance. Paragraph 206 states that:

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas it states, in paragraph 207, that:

Not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative

significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

1.3 Summary of Findings and Reasoning

The site is sensitive in terms of its potential for impact on heritage assets of acknowledged importance. In particular, the Old Headington Conservation Area, The Rookery (listed Grade II) and the walled garden adjacent to The Rookery (listed Grade II) all have the potential to be impacted. However, it is our view that development could be accommodated on the site if the bulk and mass, and in particular the height, were conceived and disposed of in such a way so as to take advantage of the shelter from viewing offered by the new library and teaching accommodation which is part of Ruskin College and the large development at Barton Park.

The site lies within the view from Elsfield back towards Oxford which is highlighted by the Elsfield View Cone. However, it does not lie within the vicinity of the historic core/ 'dreaming spires' which the view cone was designed to protect, but some way to the left of it (close to the John Radcliffe Hospital and Plowman's Tower, although closer to the foreground) when Oxford is viewed from Elsfield. Therefore, due to the topography and the sites location, and due to the intervening development of Barton Park, the site could be developed in such a way that it did not cause harm to the designated heritage assets which comprise the historic skyline of Oxford as seen in this view.

Due to the topography, intervening buildings and vegetation, the site could be developed in such a way as to avoid harm being caused to the setting of the listed buildings which form part of Ruskin College.

However, the most challenging aspect is the potential impact on the character and appearance of the Old Headington Conservation Area. In our view any development on this site is likely to cause some level of harm to the character and appearance of the Old Headington Conservation Area, because these fields were included in the boundary in order to preserve the rural setting of the conservation area, and this is mentioned in several places in the Appraisal. Due to the size and overall character of the conservation area, this harm is likely to be considered 'less than substantial' and in this eventuality paragraph 202 of the NPPF would be engaged, requiring the harm to be weighed against the public benefits of the proposal.

2.0 Historical Background

2.1 The Development of Headington

Headington sits on a limestone ridge – known as the Oxford Heights – overlooking the Thames valley, and the old parish is bounded on two sides by the Bayswater Brook and the river Cherwell.

The village of Headington came before the city of Oxford; indeed, Oxford was created from it. Archaeological finds attest to the existence in and around the modern settlement of a Roman centre of pottery manufacture, but the roots of the current settlement are probably to be found in the Saxon period, when Headington was the 'caput' of a large Royal estate. The first documentary reference to the settlement is in a Royal charter of 1004 confirming a grant of land to St Frideswide's monastery in the early eighth century. This land – almost certainly carved out of the Royal Manor of Headington – was the kernel at the heart of the future burh of Oxford.

The settlement was clearly one of some importance. The Domesday Book (1086) shows the manor to be large, with ten hides (roughly equivalent to 1,200 acres), making it considerably larger than the modern parish. The manor remained in the hands of the Crown until after the death of Henry I in 1135 (by which time the principal royal residence in Oxfordshire was Woodstock). It passed through the hands of numerous lords in the medieval period, many of whom struggled to make the manor pay. Farming was on a three-field system, with the large open fields situated to the south and west of the village. Over the centuries – and particularly in the wake of the shock to the system that was the Black Death – wealthy yeoman emerged as the chief farmers, and established valuable land holdings among the open fields.

In the Civil War Headington's commanding position over the eastern approaches to Oxford gave it considerable strategic importance, and it was garrisoned by parliamentary troops while Oxford, in the valley below, was in the control of the King. But after the war the village was the scene of no notable events, until the changes precipitated by the construction of the turnpike road (the present London Road) to the south of the village, and the enclosure of the open fields between 1802 and 1804. These two events would have a profound impact on the appearance of the village, and the way in which it functioned.

The old village of Headington is notable for its very tight geographical plan, perhaps influenced by the historic lack of important routes from the settlement to elsewhere: despite its proximity to Oxford, the link between Headington and the city was little more than a lane right up to the end of the eighteenth-century, and development in the village spread slowly along the various routes out to the open fields. Later, expansion of the core was prevented by the several large houses and their grounds that came to encircle the village.

Headington is notable for the lack of very early buildings. The middle ages have left almost no trace, and many of the village's key historic buildings were built (or rebuilt) in the seventeenth and eighteenth centuries. It has been suggested that fire may have been a major factor in the failure of

early buildings – which were likely to have been timber-built and thatched – to survive.¹ Today stone, from local quarries, is the dominant building material, and clay tile, and stone and Welsh slate the usual roofing material.

2.2 The Rookery

The following has been extracted and edited from the Asset Heritage Consulting Heritage Statement for Ruskin College/ The Rookery dated April 2022.

- 2.7 During the 17th century, a number of prosperous tradesmen and more lowly cottagers migrated out of Oxford to Headington, the wealthier among them building substantial stone houses for themselves, and the poorer finding they could live there more cheaply than in the city. One of these migrants was William Finch (d.1697).
- 2.8 In c.1660, William Finch converted and altered a 16th-century dwelling, previously in peasant occupation, into the house that would become known as The Rookery. Finch's converted building remains at the centre of the present house, which has been much altered and extended since. After William Finch's death in 1697 the house passed to his nephew, Abraham Finch (d.1703), and married to Elizabeth (d.1711). [their son] another William Finch (1672-1752), inherited The Rookery. After 1714, the Rookery seems to have become the family's main residence (remaining in the family until 1863).
- 2.9 It is likely to be this William Finch who constructed the walled garden at The Rookery.
- 2.11 Richard Finch [a relative], seems to have tried to sell the Rookery in 1777, but this evidently did not come to pass and he married Laetitia White (d.1846) in 1778, their five children being born at the Rookery between 1779 and 1794.
- 2.12 Richard and Laetitia's eldest son, also Richard (1779-1851), inherited the property in 1802 and in 1803 married Clara Bunce (1779-1849). Under the Headington Enclosure Award of 1804, Richard Finch was awarded over 30 acres in lieu of copyhold lands under Headington Manor while his mother was awarded 110 acres of land as a lessee of Magdalen College. These 140 acres included the site of the present house called Stoke on the other side of Stoke Place, and Highfield Farm on the other side of the London Road. The lands associated with the Rookery stretched from north of the present Northern Bypass to as far south as Old Road.
- 2.13 An extract from the enclosure map, shows the house as having an 'L'-shaped form, but it is not clear whether the southern element represents the current southern block (with projection to the east) or whether this is a c.1660 element that Richard Finch was to rebuild or remodel shortly after the enclosure map was made.

1 J. Cook, L. Taylor (eds), *A Village Within a City: The Story of Old Headington*, Oxford, 1987, p.33.

- 2.14 Extending from the west side of the house a quadrangular enclosure or courtyard is shown in an area of 'old enclosures' west of the house, and the walled garden with 'crinkle-crinkle' wall is also depicted.
- 2.16 Clara Finch died in September 1849 and later that year Richard Finch decided to sell the Rookery, ending the nearly 200-year ownership of the house by his family. [The] Trustees of the Finch family let the house out furnished between 1854 and 1858 to the Revd Dr Arnold, and then made an attempt to sell it in August 1858. The sale particulars refer to a number of outbuildings, including stabling for five horses, a coach house, small cow house and others. The mansion and outbuildings are said to be surrounded by pleasure grounds comprising shrubberies, lawns, kitchen and fruit gardens, rookery and orchard, and a close of grassland containing firs, elms and other trees.
- 2.17 No sale took place and the house was instead let to the Revd John William Augustus Taylor, who established a preparatory school there. In 1863, he bought the property and the associated land on both sides of the London Road. Taylor retired in 1883 and moved into a new house he had built on the other side of the lane, which he called Stoke. The Rookery and the meadows to the north were put up for sale and purchased by Dr Walter Sumner Gibson, who continued to run the school there until 1897 when the property was again put up for sale.
- 2.18 The outbuildings then described included two loose boxes, an apple store (originally a three-stall stable), a double coach house, a wood house, a knife house, wood bin, WCs and a walled-in coal yard.
- 2.19 The 1899 OS map (surveyed in 1898), shows the house in three distinct elements: the central earliest part, with various late 19th-century extensions, the large late Georgian square block to the south, and a lower later 19th-century range to the north. The walled kitchen garden, with its 'crinkle crinkle' north wall is shown immediately north-east of the house. The carriage drive is shown on a similar alignment to the present one, entering the grounds from the junction of Dunstan Road and Stoke Place and immediately splitting into two branches, one to the south front of the house, circling around to meet the other, which ran along the south wall of the site to the coach house and stables. Another section branched off (across land now built on with the 2012 academic block extension) to the east side of the house and service area.
- 2.21 Between 1899 and 1909, the house was occupied as a private home by Mrs Amy Price (d.1909), wife of the Revd. Dr Batholomew Price (d.1898). She renamed the house Charlton Lea. It was then bought by Dr John Massie (1842-1925), who made extensive improvements to the house, including installing electric lighting. Following his death and that of his wife in 1933, the Colburn building firm of Swindon bought the house and its grounds for development, but Oxford City Council refused to grant them planning permission.

- 2.22 The 1921 OS map (surveyed in 1919) shows further extensions to the west side of the building, presumably those made by Dr John Massie. The carriage drive had been extended to the west (as had the coach house) and the layout of the grounds had been reconfigured east and west of the house (here named Charlton Lea. The glasshouse and yard enclosure that had previously stood along and outside the eastern wall of the kitchen garden had been demolished and replaced with two new larger yards containing various outbuildings. New glasshouses had been erected within the walled garden itself. An additional branch of the driveway led north to these yards and then east out to a new vehicle entrance onto Stoke Place.
- 2.23 In 1934 the house and lands were bought by Sir Michael Sadler (1861–1943) when he retired as Master of University College, and he restored its original name of The Rookery. The Northern Bypass was built through its fields in 1935. His son, Thomas Harvey Sadler, inherited the property and, on 15th May 1944, sold it to Aubrey Edward Gurden, who had co-founded the Oliver & Gurden bakery. During the Second World War the house's grounds were requisitioned by the War Office. The American army camped there in Nissen huts and later used the house as a convalescent home. The 1939 OS map shows little evident change to the configuration of the grounds since 1921.
- 2.24 In 1946 Gurden let out the whole Rookery estate to Ruskin College, which was outgrowing its original premises in Walton Street, and on 10th October 1947 sold it to the college. The Rookery then became known as Ruskin Hall.
- 2.25 Ruskin College was founded in 1899 (as Ruskin Hall) by Charles A. Beard and Walter W. Vrooman, Americans studying at the University, and was promptly supported by trade unions in the UK. It was the first of its kind, providing a residential college for working men, with women admitted from 1919. The curriculum covered a broad spectrum of subjects but with a focus on the social sciences. It was first established at 14 St Giles, acquiring a new site on Walton Street four years later.
- 2.26 The college was named for John Ruskin (1819-1900), the influential English writer, art critic and philosopher, writing on subjects as diverse as architecture, geology, literature, ornithology, education, botany, mythology and political economy, in all cases emphasising the connections between nature, art and society.
- 2.27 The Ruskin Hall Scheme soon expanded beyond Oxford, with other Ruskin Halls opening in other cities including Manchester, Liverpool, Stockport and Birmingham. The college also offered correspondence courses, which continued to operate during WWI when the College building was occupied by Belgian refugees, and during WWII when much of it was used as a maternity ward.
- 2.28 After the war there was a sharp increase in student numbers due to the War Office Scheme which offered free education for ex-servicemen. This enabled the College to acquire the site of The Rookery in 1948, after renting it from 1946. The building was

renamed Ruskin Hall and initially served as a hostel before soon becoming a teaching centre for first-year students. The Rookery was listed at Grade II on 12th January 1954.

- 2.29 In 1965, the college also bought Stoke on the other side of Stoke Place, now referred to as Stoke House, and in the next few years the establishment underwent many changes, which included intensive redevelopments of both the Rookery and Walton Street campuses.
- 2.30 Development of The Rookery site included the erection of a number of detached residential blocks. The first of these, Bowerman House, was constructed in 1959 east of The Rookery and close to the eastern boundary of the site. This was demolished in 2011 prior to the construction in 2012 of the new academic block attached to the east side of The Rookery, which itself replaced Tawney Hall, a 1960s' refectory wing that was attached to the eastern side and rear of the listed building.
- 2.31 The rest, built between the 1960s and '80s, were sited around what became a loose quadrangle immediately west of the house, and remain extant. Bowen House, at the northern, lowest end of the group, was constructed in 1965 (and is proposed to be replaced by the new Block A). Biko House, on the west side, was built in 1976 and Beatrice Webb House in 1987 at the southern end. A timber-framed single-storey nursery was built in the southern half of the walled garden, and a hard-surfaced tennis court was laid out in the northern half.
- 2.32 In 2010 Ruskin College sold its old site in Walton Street to Exeter College and in September 2012 moved its entire operation to the 20-acre Rookery/Stoke House site.
- 2.33 The block attached to the eastern side of The Rookery, constructed in 2012, includes teaching rooms, offices, a library and a café.

2.3 Summary History of the Rookery

At its core a 17th century house, altered and enlarged in the 18th and 19th centuries, with the listed walled garden being added in the early part of the 18th century. It was built and occupied as a private residence and retreat from Oxford until the mid-19th century when it was used as a school, and this use continued until the Second World War when the house and grounds were requisitioned by the War Office and later used as a convalescent home. In 1948 it was bought by Ruskin College, who had outgrown their premises in Walton Street, Jericho in Central Oxford, and who used it as a hostel and teaching centre. From the late 1950s the site was further developed with student and teaching accommodation and other facilities associated with this use. In 2010 Ruskin College entirely vacated its Walton Street site and moved to The Rookery and an adjoining site known as Stoke House, from where it continues to provide education and accommodation.

2.4 History of Ruskin Field

The fields to the north of The Rookery retain their historic shape as shown on the Tithe and subsequent maps. They seem always to have been pasture as none of the maps show any trees or woodland, and associated with The Rookery. The pond to the north-east of The Rookery appears on the First Edition OS Map (1899) and subsequent editions. No other features are shown.

3.0 Site Survey Descriptions

3.1 The Site [Plates 1-2]

Two fields on a pronounced slope southwards towards the A40, totalling approximately 4.8ha and under pasture, with mature hedges/ taller trees acting as boundaries between the two fields and along the boundary with the A40. Views to the south include the A40 in the foreground, Barton Park development in the mid-ground and farmland rising to the north of Barton Park towards the village of Elsfield.



1 Ruskin Fields



2 Ruskin Fields

3.2 Elsfield View Cone [Plates 3-6]

'Assessment of the Oxford View Cones 2015 Report' sets out the history of viewing Oxford from the higher ground which surrounds it and describes how from the Early Modern period throughout the 18th and 19th centuries, views of Oxford were recorded, praised and promoted. However, it wasn't until the early 1960s that this interest translated into action and for the first time the places where Oxford could popularly be seen were marked and described in terms of what makes them special. Elsfield is one, and the view is marked as being from a footpath a little way to the west of the village centre, but in reality the view from Elsfield back to Oxford is kinetic, and Oxford can be seen from many points on this network of footpaths. The view therefore changes dependent upon the precise location, time of year and time of day. From these points south of the village, the 'dreaming spires' are clearly visible and Oxford's location in the valley with hills rising beyond is apparent.



3 *Elsfield View Cone*



4 *Elsfield View Cone*



5 *Elsfield View Cone*



6 *Elsfield View Cone*

Interpreting what is intended to be protected through identifying the view cone requires an understanding of what makes this view significant. For example, the 'cone' as drawn on the map contained within the Local Plan **[Plate 7]** shows a triangular shape focussed on the historic skyline of Oxford. However, the photograph and schematic interpretations of the photograph of the view which are represented by the cone as reproduced in the document entitled *The Oxford View Cones: Views from the North Eastern Hills 2015 Report* **[Plates 8-10]** illustrates that it is the entire view as seen from Elsfield which needs to be considered, and development within this view assessed in terms of its impact on the main protected area ie the historic skyline of central Oxford. This explains why there appears to be some discrepancy; in these pictographic representations, the John Radcliffe Hospital forms part of the view, whereas the depiction of the view cone on the map (the cartographic representation) clearly excludes this prominent feature. In some senses this can be interpreted much as list description is: it is not a list of protected features but a way of identifying which building is intended to be protected. The cartographic representation of the view cone is not an inclusion/ exclusion zone, but an indication of where the viewer would need to stand, and in which direction they would need to look, in order to appreciate the view of Oxford. It is the whole of the actual view which needs to be taken into account, and the impact on the significance of heritage assets within it which needs to be assessed. Thus the view cone draws attention to the wider view of Oxford, Headington and hinterland as shown on the photograph and schematic drawings.

The John Radcliffe Hospital and Plowman's Tower (now reclad in a less strident ochre colour) are also very visible, and Ruskin College's new library can also be seen. The site itself as low-lying pasture fields are harder to pick out not least because of the intervening Barton Park, although at present Barton Park makes less impact than one might expect. This may change as Phases 2 and 4 are constructed. However, overall, it is clear that the site makes a limited contribution to the significance of the setting of heritage assets as viewed from Elsfield, and no contribution to the significance of the setting of historic core of Oxford.



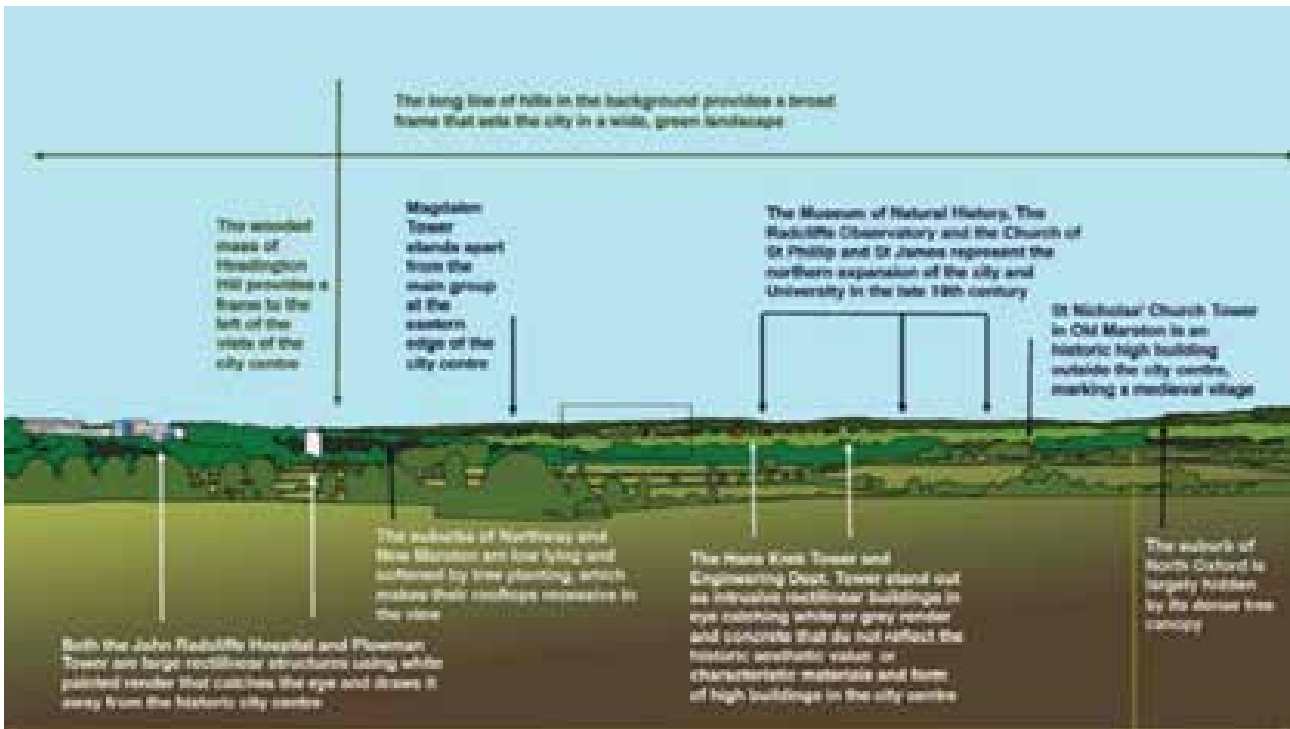
7 *View Cones of Oxford*



8 *Photograph of the view from Elsfield from The Oxford View Cones 2015*



9 Simplified rendering of Elsfield view from *The Oxford View Cones* 2015



10 Interpretation of view from Elsfield from *The Oxford View Cones* 2015

3.3 The Contribution of the Site to the Setting of the Listed Buildings [Plates 11-12]

The fields lie directly to the north of two listed buildings, The Rookery and the walled garden to the east of this building. They are both listed Grade II. On paper, the fields make a positive contribution to the significance of the setting of the listed buildings as they form part of the open pastureland over which the house and walled garden looked. In practice, there is a thick line of trees between the two and modern buildings constructed from the mid-20th onwards stand between the house and fields. The walled garden is too low to make much impact and in reality the fields offer little in the way of significance to the setting. The immediate setting of the listed buildings is allocated under SP56 and when this development is undertaken the site would make a very limited/ no contribution to the setting of the listed buildings.

3.4 The Contribution of the Site to the Conservation Area

The fields appear to have been included in the boundary of the Old Headington Conservation Area in order to protect the rural and pastoral setting of the village from the north. Whilst these fields are not mentioned in particular in the Old Headington Conservation Area Appraisal, their role in what makes Old Headington a characteristic and special place is indicated in several places within the document, for example: Summary of Significance "10. Green and open spaces contribute to rural character and setting" and "13. Visual connection with the countryside" and Vulnerabilities "5. Loss of rural character through depletion of green open space, roadside verges and hedgerows and views out to rural setting." The Appraisal mentions in a number of places the contribution made by green, open, rural spaces as opportunities to understand the relationship of the village to the countryside beyond, as places for recreation and wildlife and as "small fields cut-off from the wider countryside by the ring road provide the rural setting of the village." The development of The Rookery is an example of the larger 'country houses' which grew up around Oxford in the 17th and 18th century and acted as rural retreats from the city. They also constrained the growth of Headington and allowed the retention of the paddocks and fields beyond. In this sense, the site fits well with this understanding and makes a positive contribution to the character and appearance of the conservation area.

However, the allocation of the field closest to The Rookery under SP55 and SP56 has already undermined this contribution to some extent and has reduced the amount of green space within this northern part of the conservation area.



11 *The site looking north to The Rookery*



12 *The site looking north to Ruskin College library*

4.0 Promotion of the Site for Allocation Within the Local Plan

4.1 Local Plan 2020

The site of Ruskin College and the paddock immediately to the north are already allocated in the Local Plan 2020 for development under policies SP55 and SP56. At the same time, the northern part of Ruskin Field (the site which is the subject of this report) was promoted. However, the Planning Inspector's Report into the soundness of the Local Plan found that whilst development on the southern part of the site (covered by Policy SP56) would not have an adverse effect on the significance of the Conservation Area or heritage assets, extending SP56 to cover the northern part of Ruskin Field "could have an adverse impact on the Old Headington Conservation Area and the Elsfield View Cone" and as a result was not allocated.

4.2 Call for Sites – Emerging Local Plan 2040

In March 2022 Quod wrote to Oxford City Council in response to a call for sites to be put forward for consideration for allocation in the Emerging Local Plan 2040, suggesting Ruskin Fields be included in the site allocation. Following discussion with Oxford City Council, Quod have requested heritage consultancy services to provide an evidence base for inclusion of this site, and this report contributes to that evidence.

4.3 Changes Between 2020 and Now

Given that in 2020 the Planning Inspector found that development of the site could have an adverse impact on the Old Headington Conservation Area and Elsfield View Cone, it is important to understand why the planning situation has changed in the last two years. This lies in part in the development of Barton Park, which lies to the north of Ruskin Field, on the northern side of the A40, which when finished would filter views of the site when seen from Elsfield and are not likely to interrupt the focus of the Elsfield view cone.

Barton Park is an 885 unit residential extension of Oxford. It is between Oxford and the viewing point which dictates the view cone from Elsfield. Barton Park is being delivered across four Phases, wherein Phase 1 (237 houses) has been completed and Phase 2 (207 houses) is under construction. All Phases of Barton Park will be completed by 2027/28. When viewed from Elsfield, Barton Park lies in the middle ground, with the John Radcliffe Hospital and Plowman Tower serving as the highly prominent/ dominant features in this part of the view. Barton Park therefore is key change post-2020 which would allow the consideration of Ruskin Fields to be viewed differently.

Allied to this is our interpretation of the potential impact on the Elsfield View Cone, which the Inspector raised as being potentially problematic. As set out in 3.2 above, the site is visible in the view towards Oxford from the viewing point to the south of Elsfield, and this view is kinetic. However, the significance of the view – the protected historic core of Oxford, visible as a jagged skyline of towers and pinnacles, located some way to the

right of Ruskin Fields in the view – would not be impacted. Therefore, it is likely that the site could be developed in such a way that the special characteristics of the view from Elsfeld would not be adversely affected. Therefore one of the two heritage reasons why the site was not allocated can, in our view, be satisfactorily addressed.

The allocation of part of the site under SP56 demonstrates that development on this site in generally terms could be acceptable. SP56 would result in the loss of some of the open land to the north of the conservation area, and whilst in our view development on the remainder is likely to cause some, less than substantial harm, to the character and appearance of the conservation area, SP56 means that the level of harm would be lessened.

5.0 Conclusions

It is likely to be possible to develop the site in such a way as to avoid causing a harmful impact on the setting of the two listed buildings or the view identified as worthy of protection by Elsfield View Cone.

It is unlikely to be possible to develop the site in such a way as to avoid causing harm to the character and appearance of the Old Headington Conservation Area. The level of harm is not quantifiable in the absence of specific proposals, but it is very unlikely to exceed the threshold of 'substantial' harm. Rather, it is likely to be considered 'less than substantial' and under paragraph 202 of the NPPF would require the harm to be weighed against the public benefits of a proposal.

Appendix I - Statutory List Descriptions

Heritage Category: Listed Building

Grade: II

List Entry Number:1369369

Date first listed:12-Jan-1954

Statutory Address: THE ROOKERY (RUSKIN COLLEGE), DUNSTAN ROAD

National Grid Reference:

SP 54271 07789

Details

DUNSTAN ROAD 1. 1485 (North Side) The Rookery (Ruskin College) SP 5407 18/47 12.1.54. II 2. RCHM 274. Now a hostel of Ruskin College. The central range of the house is C16-C17 but there have been alterations and on North and West some additions. 3-storeyed ashlar and rubble with a modern brown tiled roof and yellow brick stacks. The South elevation has 5 C19 sash windows in plain stone reveals, a stone porch and moulded parapet. The North wing has a modern modillioned eaves cornice and contains some 3 stone mullioned windows of 3 and 4 lights and a rubble gable end. Interior: RCHM page 186b. Includes 2 stone fireplaces.

Listing NGR: SP5427107789

Heritage Category: Listed Building

Grade: II

List Entry Number: 1047296

Date first listed: 28-Jun-1972

Statutory Address 1: WALL OF RUSKIN COLLEGE ON THE NORTH, DUNSTAN ROAD

County: Oxfordshire

District: Oxford (District Authority)

Parish: Non Civil Parish

National Grid Reference:

SP 54312 07847

Details

This list entry was subject to a Minor Amendment on 14/12/2011
Garden walls at Ruskin College. C18 and later. Stone and brick garden walls form four sides of a walled garden where the northern, east-west section comprises an C18 crinkle crinkle wall.

Listing NGR: SP5431207847

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72(l) of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, section 66 of the above Act states that:

In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, section 72(l) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

City of Oxford Local Plan (2001-2016)

Local plan currently undergoing consultation. Once adopted the Oxford Local Plan 2036 will replace the Local Plan 2001-2016, the Core Strategy 2026 and the Sites and Housing Plan.

POLICY HE.1 - NATIONALLY IMPORTANT MONUMENTS

Planning permission will not be granted for any development that would have an unacceptable effect on a nationally important monument (whether or not it is scheduled) or its setting. The scheduled monuments are shown on the Proposals Map.

POLICY HE.3 - LISTED BUILDINGS AND THEIR SETTING

Planning permission will be granted for the re-use of redundant or unused listed buildings for new purposes compatible with their character, architectural integrity and setting.

Planning permission will not be granted for proposals involving demolition of a statutory listed building. Planning permission will only be granted for works involving an alteration or extension to a listed building that is sympathetic to and respects its history, character and setting.

Planning permission will only be granted for development which is appropriate in terms of its scale and location and which uses materials and colours that respect the character of the surroundings, and have due regard to the setting of any listed building.

POLICY HE.7 - CONSERVATION AREAS

Planning permission will only be granted for development that preserves or enhances the special character and appearance of the conservation areas or their setting. Planning permission will not be granted for proposals involving the substantial demolition of a building or structure that contributes to the special interest of the conservation areas.

The boundaries of the conservation areas are shown on the Proposals Map.

POLICY HE.10 - VIEW CONES OF OXFORD

The City Council will seek to retain significant views both within Oxford and from outside, and protect the green backcloth from any adverse impact. Planning permission will not be granted for buildings or structures proposed within or close to the areas that are of special importance for the preservation of views of Oxford (the view cones) or buildings that are of a height which would detract from these views.

The View Cones of Oxford are indicated on the Proposals Map.

Oxford City Council Core Strategy (2011)

Policy CS18

Urban design, townscape character and the historic environment

Planning permission will only be granted for development that demonstrates high-quality urban design through:

- responding appropriately to the site and its surroundings;

- creating a strong sense of place; • being easy to understand and to move through;
- being adaptable, in terms of providing buildings and spaces that could have alternative uses in future;
- contributing to an attractive public realm;
- high quality architecture.

Development proposals should respect and draw inspiration from Oxford's unique historic environment (above and below ground), responding positively to the character and distinctiveness of the locality. Development must not result in loss or damage to important historic

features, or their settings, particularly those of national importance and, where appropriate, should include proposals for enhancement of the historic environment, particularly where these address local issues identified in, for example, conservation area character appraisal or management plans. Views of the skyline of the historic centre will be protected.

Oxford City Local Plan 2036

Heritage Policies

Policy DH1: High quality design and placemaking

Planning permission will only be granted for development of high quality design that creates or enhances local distinctiveness.

All developments other than changes of use without external alterations and householder applications will be expected to be supported by a constraints and opportunities plan and supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement or a Planning Statement), which should cover the relevant checklist points set out in Appendix 6.1.

Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 6.1.

Policy DH2: Views and building heights

The City Council will seek to retain significant views both within Oxford and from outside, in particular to and from the historic skyline.

Planning permission will not be granted for any building or structure that would harm the special significance of Oxford's historic skyline.

Planning permission will be granted for developments of appropriate height or massing, as demonstrated by the following criteria, all of which should be met:

- a) design choices regarding height and massing have a clear design rationale and the impacts will be positive; and
- b) any design choice to design buildings to a height that would impact on character should be fully explained, and regard should be had to the guidance on design of higher buildings set out in the High Buildings Study TAN. In particular, the impacts in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character should be explained; and
- c) it should be demonstrated how proposals have been designed to have a positive impact through their massing, orientation, the relation of the building to the street, and the potential impact on important views including both in to the historic skyline and out towards Oxford's green setting.

The area within a 1,200 metre radius of Carfax tower (the Historic Core Area) contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2 m (60 ft) in height or ordnance datum

(height above sea level) 79.3 m (260 ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height should be limited in bulk and must be of the highest design quality.

Applications for proposed development that exceeds that height will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:

- i. a Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible
- ii. use of 3D modelling so that the impact of the development from different locations can be understood, including any view cone views that are affected; and
- iii. an explanation of what the impacts will be in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character; and
- iv. reference to how the guidance in the High Buildings Study Technical Advice Note has been followed.

Any proposals within the Historic Core Area or View Cones that may impact on roofscape and the foreground part of views (including proposals where they are below the Carfax datum point, for example plant) should be designed carefully, and should meet all the following criteria:

- they are based on a clear understanding of characteristic positive aspects of roofscape in the area; and
- they contribute positively to the roofscape, to enhance any significant long views the development may be part of and also the experience at street level;

Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view.

The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map.

Policy DH3: Designated heritage assets

Planning permission or listed building consent will be granted for development that respects and draws inspiration from Oxford's unique historic environment (above and below ground), responding positively to the significance, character and distinctiveness of the heritage asset and locality.

For all planning decisions for planning permission or listed building consent affecting the significance of designated heritage assets, great weight will be given to the conservation of that asset and to the setting of the asset where it contributes to that significance or appreciation of that significance.

An application for planning permission for development which would or may affect the significance of any designated heritage asset, either directly or by being within its setting, should be accompanied by a heritage assessment that includes a description of the asset and its significance

and an assessment of the impact of the development proposed on the asset's significance. As part of this process full regard should be given to the detailed character assessments and other relevant information set out any relevant conservation area appraisal and management plan.

The submitted heritage assessment must include information sufficient to demonstrate:

- a) an understanding of the significance of the heritage asset, including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; and
- b) that the development of the proposal and its design process have been informed by an understanding of the significance of the heritage asset and that harm to its significance has been avoided or minimised; and
- c) that, in cases where development would result in harm to the significance of a heritage asset, including its setting, the extent of harm has been properly and accurately assessed and understood, that it is justified, and that measures are incorporated into the proposal, where appropriate, that mitigate, reduce or compensate for the harm.

Where the setting of an asset is affected by a proposed development, the heritage assessment should include a description of the extent to which the setting contributes to the significance of the asset, as well as an assessment of the impact of the proposed development on the setting and its contribution to significance.

Substantial harm to or loss of Grade II listed buildings, or Grade II registered parks or gardens, should be exceptional. Substantial harm to or loss of assets of the highest significance, notably scheduled monuments, Grade I and II* listed buildings, Grade I and II* registered parks and gardens, should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a designated heritage asset, planning permission or listed building consent will only be granted if:

- i. the harm is necessary to achieve substantial public benefits that outweigh the harm or loss; or all of the following apply:
 - ii. the nature of the asset prevents all reasonable uses of the sites; and
 - iii. no viable use of the asset itself can be found in the medium term (through appropriate marketing) that will enable its conservation;
- and
- iv. conservation by grant funding or similar is not possible; and
 - v. the harm or loss is outweighed by the benefit of bringing the site back into use;
 - vi. a plan for recording and advancing understanding of the significance of any heritage assets to be lost, including making this evidence publicly available, is agreed with the City Council.

Where a development proposal will lead to less than substantial harm to a designated heritage asset, this harm must be weighed against the public benefits of the proposal. Clear and extensive justification for this harm should be set out in full in the heritage assessment.

Conservation areas are listed in Appendix 6.2 and defined on the Policies Map.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and

any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness

With regard to applications seeking to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), paragraph 198 states that:

...local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 200 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, paragraph 202 of the NPPF states the following;

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

In terms of non-designated heritage assets, the NPPF states:

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 206 states that:

... Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 207, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Concerning enabling development, it states, in paragraph 208, that local authorities should:

assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 199-203 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 199-203) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 200).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

Historic England: Conservation Principles and Assessment (2008)



Note

Environmental Desk Based Appraisal of Land at Ruskin Fields

1 Purpose of this Report

1.1 Quod have been instructed by the University of West London (UWL) to undertake a Desk Based Environmental Appraisal of land at Ruskin Hall, Dunstan Road, Oxford, OX3 9BZ ('the Site'). The purpose of this report is to set out the key environmental sensitivities and evidence whether these pose a constraint to future residential development at the Site. Quod have reviewed available environmental evidence mapping and reporting as well as local and national environmental policy. The report also highlights the potential environmental gains that future development could deliver and how they respond to objectives in the draft Local Plan 2040¹.

2 Description of Site and Surrounding Sensitivities

- 2.1 Ruskin Fields, shown with the indicative red line boundary in Figure 2.1 below, consists of fields lined by hedgerows and trees. The fields appear semi-improved natural grassland ranging from species-poor to moderately species-rich². To the south, the Site also includes a small orchard, ponds and area of tall herbs.
- 2.2 The fields are bordered by the A40 in the north which is dual carriageway. Ruskin Fields lie to the north of the Ruskin College buildings and immediate curtilage which is shown with the indicative orange line boundary in Figure 1. Ruskin Fields and college lie within the Headington Conservation Area.
- 2.3 Figure 2.2 shows the environmental sensitivities within 1km of the Site. There is one Grade I listed and 39 Grade II listed buildings within the Headington Conservation Area. Ruskin College/ The Rookery (a Grade II listed former house) and the walled garden which is part of this (also listed Grade II) are located immediately south of the Site.
- 2.4 A Public Right of Way (PRoW) byway (320/55/10) and bridleway (320/56/10) currently run along the eastern site frontage via Stoke Place.
- 2.5 There is one historic landfill approximately 500m north-east.
- 2.6 A Local Nature Reserve 'Magdalen Quarry' is located 1km to the south-east of the Site.
- 2.7 The whole site is located with the Oxford City Air Quality Management Area (AQMA).

¹ https://www.oxford.gov.uk/info/20067/planning_policy/1460/oxford_local_plan_2040

² https://www.oxford.gov.uk/download/downloads/id/5153/phase_1_botanical_survey_target_notes_for_additional_oxford_city_sites.pdf



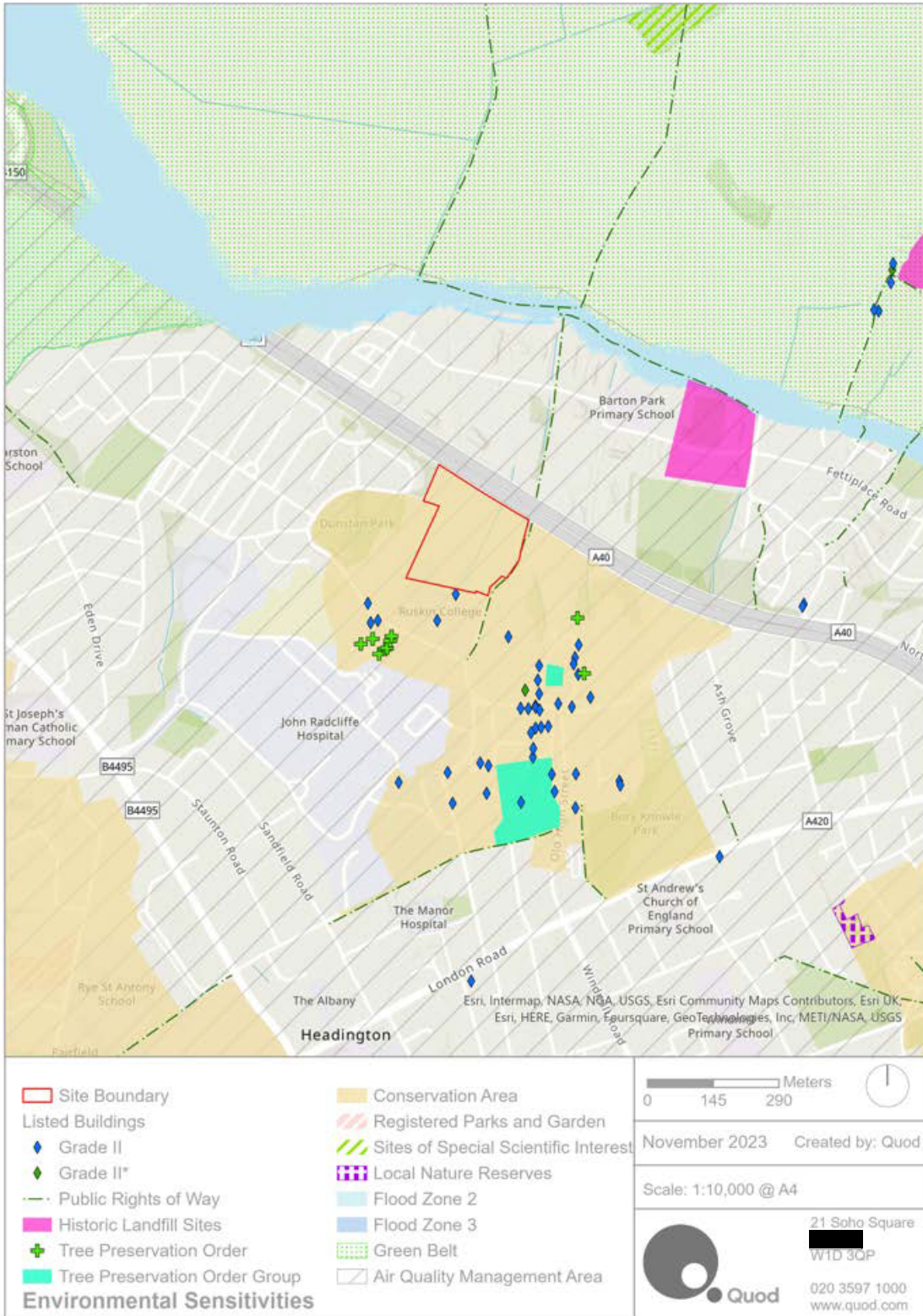
Figure 2.1 Ruskin Field site (red line boundary) and Ruskin College site (orange line boundary)





Note continued

Figure 2.2 Surrounding Environmental Sensitivities





Note continued

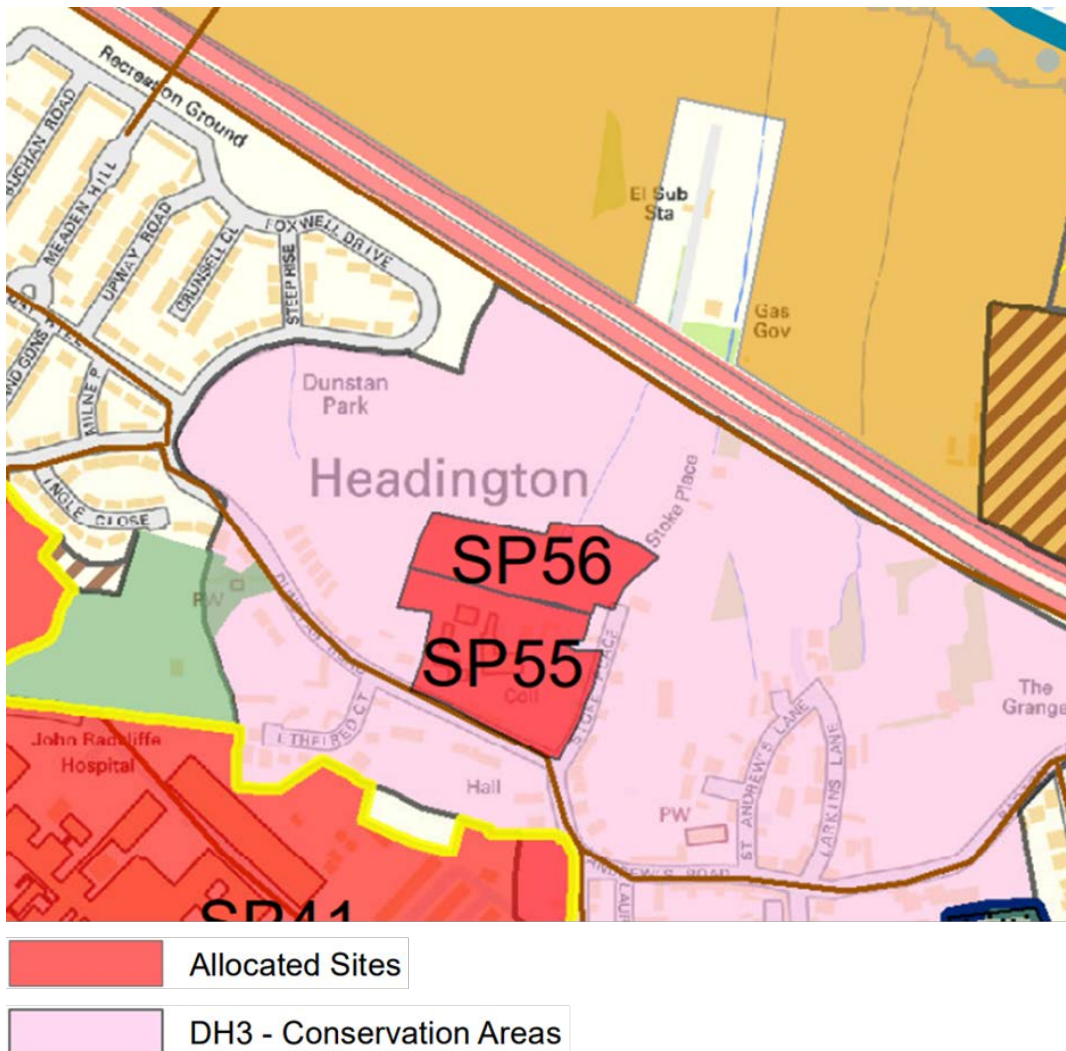
3 Planning Background

Oxford Local Plan 2016 – 2036 (adopted Local Plan)

3.1 As shown in Figure 3.1 the Site has the following designations in the adopted Oxford Local Plan (2020)³:

- Site Allocation Policy SP56 (Ruskin Fields) (covering part of the Site); and
- Conservation Area (shown in pink).

Figure 3.1 Adopted Oxford Local Plan 2016 - 2036 policies map



³ https://www.oxford.gov.uk/info/20067/planning_policy/1311/oxford_local_plan_2016-2036



Note continued

- 3.2 Policy SP56 allows planning permission to be granted for expansion of the adjoining academic institution and/or residential development use only, which may include employer linked affordable housing. Other complementary uses would be considered on their merits
- 3.3 The supporting text associated with Policy SP56 (at page 208) stated that much of Ruskin Field was unsuitable for development as its development would have a substantial negative impact on the appearance, setting and character of the Old Headington Conservation Area and is also visually sensitive from the Elsfield View Cone.

Draft Oxford Local Plan – vision for oxford in 2040 preferred options (September 2022)

- 3.4 In May 2023 Oxford City Council published their Consultation Report Part 1 which sets out how the Council undertook the consultation on the draft Oxford Local Plan 2040 preferred options document that occurred between 3rd October 2022 and 14th November 2022.
- 3.5 As detailed within the Consultation Report, several comments supporting and opposing the proposed allocation for housing at the entirety of Ruskin Field were received. A summary of the key comments received is as follows:
- Berks, Bucks and Oxon Wildlife Trust – highlighted that rare Tufa springs and associated habitats and species are very sensitive to hydrological changes which might have implications for proposed allocations at Ruskin College Campus and Ruskin Field. Also stated that Ruskin Field is carbon-rich with well-developed soil profiles that should not be disturbed to ensure no oxidation and CO2 emissions;
 - Historic England – object to the allocation as they are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the Conservation Area;
 - Unknown consultee – states that the Old Headington Conservation Area Appraisal considers Ruskin Field as a positive attribute of Old Headington; and
 - Unknown consultee – highlights that the previous proposed allocation of Ruskin Field for residential development as part of the Barton Area Action Plan adoption process was rejected, therefore the whole field should not be allocated in the Oxford Local Plan 2040.

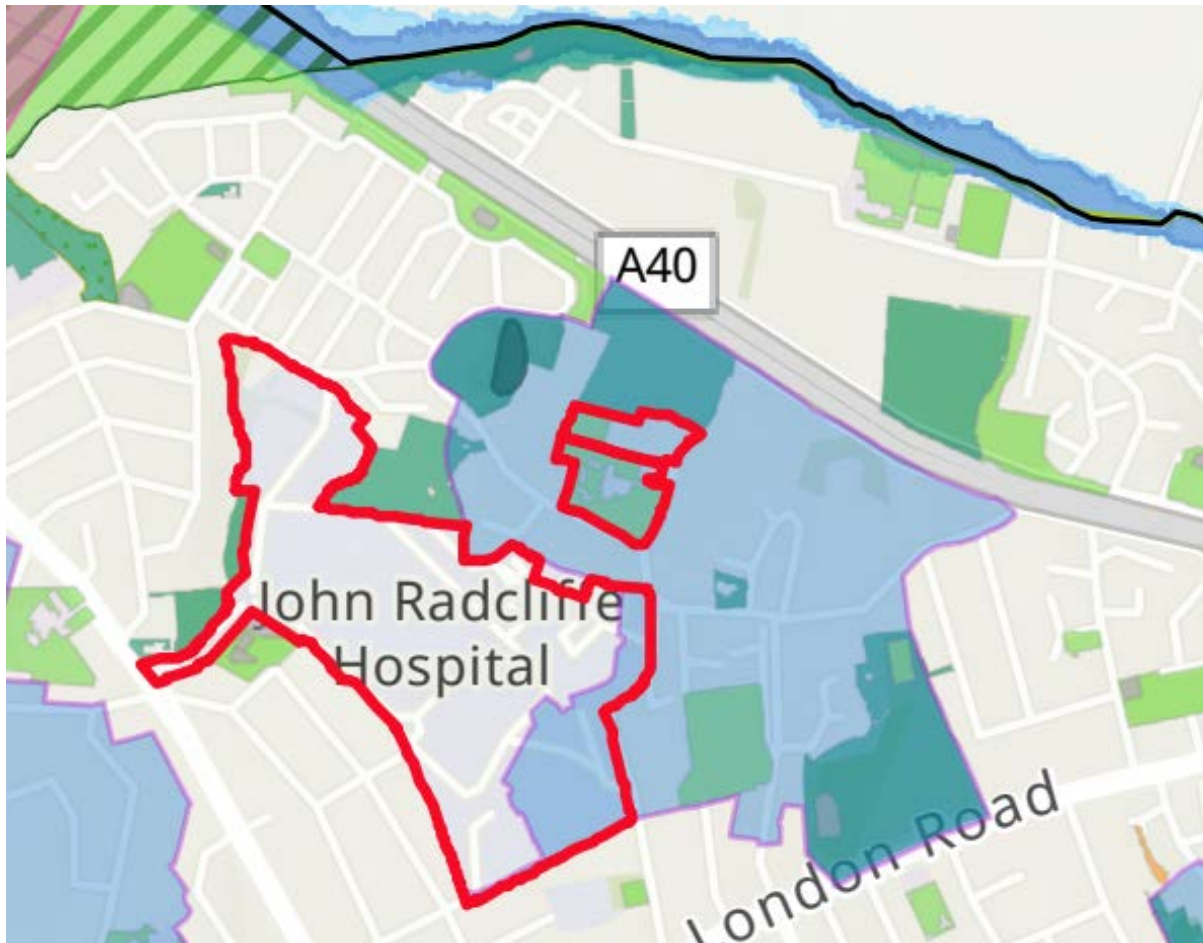
Draft Oxford Local Plan – vision for Oxford in 2040 (October 2023)





- 3.6 Oxford City Council recently published their draft Local Plan Regulation 19 for consideration by the Council’s Cabinet on 18th October 2023. The draft Local Plan 2040 is currently out to public consultation between 10th November 2023 and 5th January 2024.
- 3.7 The draft Oxford Local Plan only allocates a southern section of the Site for housing development, as shown below in Figure 3.2.



Note continued

Figure 3 Draft Oxford Local Plan Policies Map – 2



-  Site Allocations OLP2040
-  HD1 Conservation Areas
- G1 Green Infrastructure
 -  Core
 -  Supporting

4 Proposals at the Site

- 4.1 A Design Study was undertaken by Eric Parry Architects in 2022 which explored the development potential of the land and demonstrates that it has significant capacity to support residential development for example by placing that development on the lower part of the Site separated from the Ruskin Campus. A significant new area of public open space could also be incorporated which would extend public access from the open space immediately to the west. The work indicates that the Site has capacity for c.200-300 dwellings.



Note continued

5 Geology, Soils and Agriculture

Policy Drivers

- 5.1 Policy RE9 of the Adopted Local Plan (2020) and Policy R5 of the draft Local Plan 2040 require planning applications that might be affected by contamination to detail the investigations that have been undertaken to assess the nature and extent of contamination and the detailed mitigation measures needed to remove or treat the contamination.
- 5.2 Policy R6 of the draft Local Plan 2040 requires planning applications to demonstrate how the impact of development on soils has been mitigated and opportunities for conserving and enhancing the capacity/ quality of soil maximised. Peat reserves are located across the city and are important stores of both carbon and potentially valuable archaeological resources. Where development comes forward in areas of known potential for peat deposits, any impacts on the natural and historic value of these reserves needs to be considered, including their important role as carbon sinks.
- 5.3 Planning permission will not be granted for proposals that would remove or dewater 10m³ or more of peat. Major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the Council to determine any potential impacts on reserves.

Desk Based Review

Geology

- 5.4 According to the BGS Geology Viewer⁴ the bedrock underlying the Site comprises:
- Weymouth Member – Mudstone;
 - West Walton Formation – Mudstone; and
 - Temple Cowley Member – Sandstone and siltstone, interbedded.
- 5.5 An Envirocheck Report⁵ was included in the planning application for ‘Land West Of Barton North Of A40 And South Of Bayswater Brook Northern By-Pass Road’ (ref. 13/01383/OUT) located to the north of the Site on the other side of the A40. Figure 5.1 shows that the Superficial deposits beneath the Site comprise ‘Head’ (clay, silt, sand and gravel). A layer of Peat is located to the west of the Site within Dunstan Park. Tufa formation is shown on Figure 1 approximately 350m to the north of the Site.
- 5.6 Deep peaty soils are also identified at Dunstan Park by Natural England mapping⁶.

⁴ https://geologyviewer.bgs.ac.uk/?_ga=2.39523427.1575096644.1700660351-2138832351.1700660351

⁵ [13_01383_OUT-P1_GROUND_CONDITIONS - PART 2 OF 4-1373963.pdf \(oxford.gov.uk\)](https://www.oxford.gov.uk/sites/default/files/2023-01/13_01383_OUT-P1_GROUND_CONDITIONS_-_PART_2_OF_4-1373963.pdf)

⁶ <https://naturalengland-defra.opendata.arcgis.com/datasets/1e5a1cdb2ab64b1a94852fb982c42b52/explore?location=51.767306%2C-1.210546%2C15.40>



Note continued

- 5.8 An application was submitted for land at 'Ruskin Hall Dunstan Road Oxford Oxfordshire OX3 9BZ' (ref. 22/00962/FUL) immediately to the south of the Site and was accompanied by a Phase 1 and 2 Ground Investigation Report⁷ and recorded the following ground conditions at that site:

'Made Ground

Made ground was encountered to depths of between 0.40m and 2.40m depth. The deposits are highly variable ranging from clayey sands to rubblely hardcore with varying amounts of gravel brick concrete wood and glass fragments and carbonised deposits.

Topsoil

Topsoil was recorded to an average depth of 0.32m, as a brown to dark brown clayey sand to sandy clay.

Head Deposits

Head Deposits were exposed to 1.20m and 4.20m depths respectively. The deposit generally comprises very soft brown sandy to peaty clays with organic peat pockets, some humified and woody remains, fine limestone and shell fragments.

Beckley Sand Member

The Beckley Sand Member was revealed in all borehole locations. The formation, ranging in thickness from 1.40m and 6.30m, generally comprises of soft to firm light brown, orange brown, mottled, sandy clays, with some fine medium coarse sandstone fragments and sand laminae, and layers of very loose to medium dense clayey sands.

Temple Cowley Member

The Temple Cowley Member was encountered in all borehole locations. The deposit, recorded at depths of between 2.20m and 6.70m comprises predominantly firm to stiff grey to dark grey, occasionally mottled, sandy clays with some sand partings, pockets of waxy clay and varying amounts of fine medium coarses and stone fragments and occasional layers of medium dense clayey sand.

West Walton Formation

⁷

https://public.oxford.gov.uk/online-applications/files/8AA606C79E11B31BDBE019DB10B06696/pdf/22_00962_FUL-DRAINAGE_STRATEGY-2787606.pdf



Note continued

The West Walton Formation was recorded in all borehole locations at depths of between 2.25m and 13.80m). The formation generally comprises a stiff grey to dark grey fissured to blocky clay with some comminuted and whole fossil shells.

Groundwater

Multiple groundwater strikes were recorded in all borehole locations at depths ranging from 2.20m and 8.30m. Water levels recorded within the monitoring wells revealed standing levels of between 0.35m and 3.45m below existing ground level.'

- 5.9 The available information does not identify the presence of peat reserves within the Site.

Tufa formation

- 5.10 The Joint Nature Conservation Committee describes tufa formation as follows:

'Tufa formation is associated with hard-water springs, where groundwater rich in calcium bicarbonate comes to the surface. On contact with the air, carbon dioxide is lost from the water and a hard deposit of calcium carbonate (tufa) is formed. These conditions occur most often in areas underlain by limestone or other calcareous rocks, and particularly in the uplands of northern England and the Scottish Highlands.

Tufa also forms in some highly-calcareous lowland alkaline fens in southern Britain, ...where they generally form prominent upwelling masses of short open vegetation around the spring-heads that feed the fen system.^{8'}

- 5.11 There is no recorded evidence of Tufa formation within the Site however a tufa depositing stream has been recorded at Dunstan Park to west of the Site⁹:

'The centre of the site has a peaty area of old spring-fed mini alkaline fen supplied by a tufa depositing spring from the Headington Limestone aquifer.

The catchment area of the tufa spring is the green field above it and green back gardens of houses on Dunstan Rd. There should be no development here either, in order to preserve spring flow and chemistry in Dunstan Park.'

- 5.12 A Phase 1 habitat survey undertaken Thames Valley Environmental Records Centre at Dunstan Park in 2018 also provided evidence of a tufa depositing stream¹⁰.

Historic Landfills

⁸ <https://sac.jncc.gov.uk/habitat/H7220/>

⁹ <https://www.oxcivicsoc.org.uk/local-plan-2036-dunstan-park/>

¹⁰ https://www.oxford.gov.uk/downloads/file/5762/grs15_-_phase_1_habitat_survey_report_-_dunstan_park



Note continued

5.13 There is one historic landfill within a 2km radius of the Site, approximately 500m north-east. There are no areas of authorised landfill within 2km of the Site. Overall, sources of ground contamination at the Site are likely to be limited to predominantly agricultural use on-site.

Soils

5.14 Agricultural Land Classification (ALC) mapping¹¹ (Figure 5.2) confirms that the Site lies within ALC Grade 4 which is classified as ‘poor quality agricultural land’:

‘Land with severe limitations which significantly restrict the range of crops or level of yields. It is mainly suited to grass with occasional arable crops (for example cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties using the land. The grade also includes arable land that is very dry because of drought.’¹²

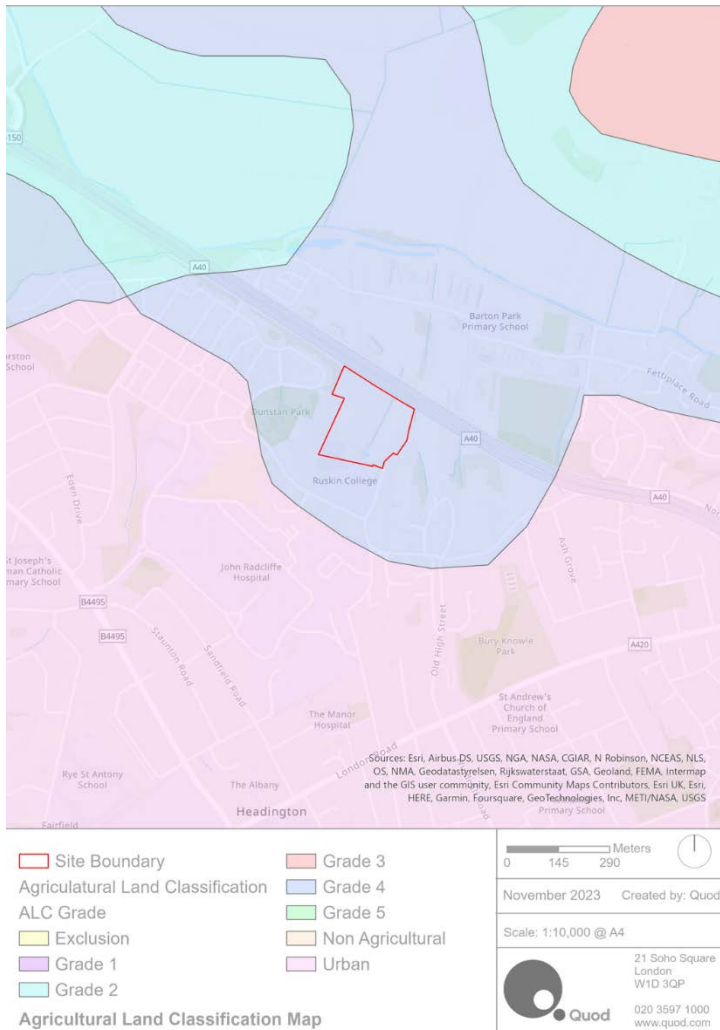
¹¹ <https://www.data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>



Note continued

Figure 5.2 Agricultural Land Classification



Further Actions and Opportunities

- 5.15 No significant risk issues from peat or tufa have been identified within the Site and the available evidence indicates that the Site is unaffected.
- 5.16 Should detailed site investigations show any presence on site or any potential harm, the development layout should be designed to protect and mitigate any harm to identified peat deposits. Initial site development layouts in any event have planned a large open area through the centre of the site (see further below).

6 Water Resources and Flood Risk

Policy Drivers

- 6.1 The following policies in the Adopted Local Plan (2020) are relevant to the Site:
 - Policy RE3: Flood risk management; and



Note continued

- Policy RE4: Sustainable and foul drainage, surface and groundwater flow.

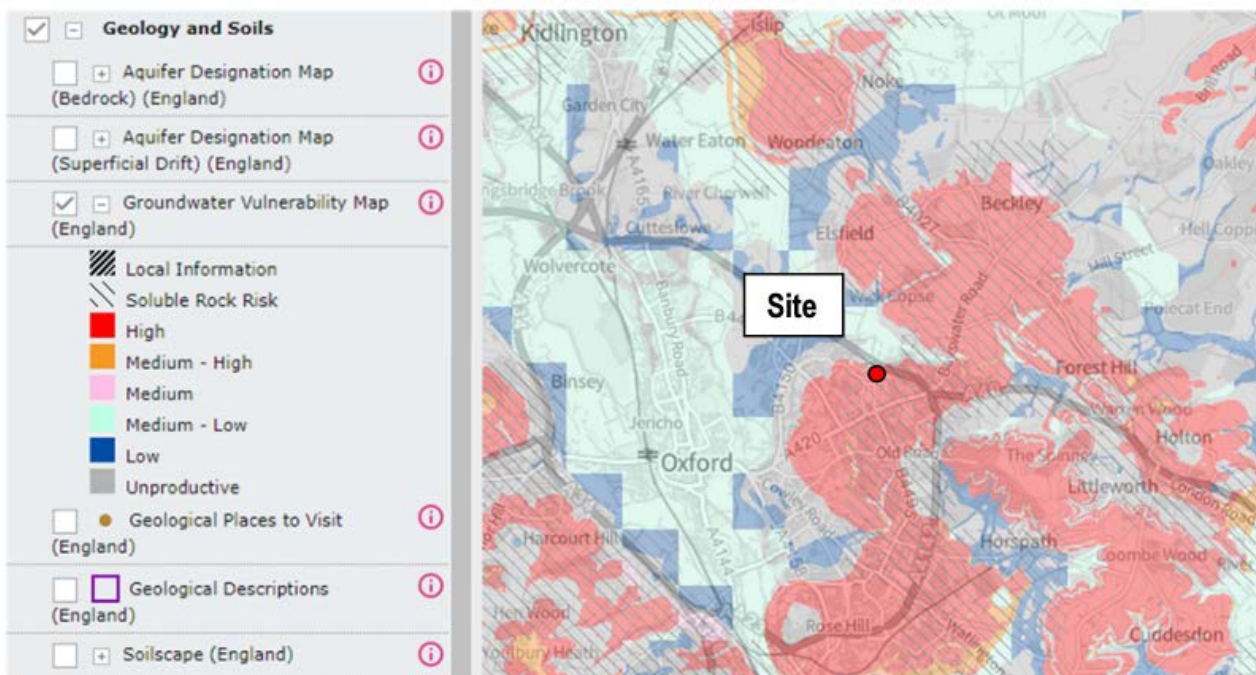
6.2 The following policies in Draft Local Plan 2040 are relevant to the Site:

- Policy G7: Flood Risk and Flood Risk Assessments; and
- Policy G8: Sustainable Urban Drainage Systems.

Desk Based Review

- 6.3 Flood mapping on the Environment Agency website¹³ which indicates that the Site in question is located within Flood Zone 1. This means that the land has been assessed as having a less than 1 in 1,000 annual chance of fluvial flooding.
- 6.4 Environment Agency surface water flood maps indicate that the majority of this site is at very low risk of surface water flooding, with an annual probability of less than 0.1%. However, small areas within east of the Site are at 'medium' (between 1:100 and 1:30) and 'high' (>1:30) probability of flooding.
- 6.5 The ground water flood risk maps obtained British Geological Survey indicate that the Site is at high risk of ground water flooding. The maps in question are included in Figure 6.2 below:

Figure 2 Groundwater flood risk



13

<https://flood-map-for-planning.service.gov.uk/confirm-location?easting=454352&northing=207622&placeOrPostcode=Headington&locationDetails=Headington%2C+Oxford%2C+Oxfordshire%2C+South+East%2C+England&isPostCode=false>



Note continued

6.6 Areas at risk of groundwater flooding or with high groundwater levels contribute to the risk of flooding from local sources. Therefore local flooding must be considered as an integral part of the design process for future development. Basements would not be permitted unless it can be demonstrated that basement would be properly protected and safe egress would be maintained during times of high groundwater levels.

Further Actions and Opportunities

6.7 In line with Policy G8 of the draft Local Plan 2040, SuDS would need to be incorporated into the development from the earliest stages of design conception. Opportunities to explore may include water conservation (e.g. rainwater collection and storage) as well as surface water drainage (e.g. soakaways, porous surfaces, swales, streams and balancing ponds). SuDS are increasingly important in the context of climate change, and can provide additional benefits, particularly where these are implemented through green features, including:

- providing open space for recreation;
- habitat to support wildlife and wider biodiversity;
- supporting water quality (through filtering out pollutants before the water joins larger water bodies like the rivers); and
- adaptation to other climate hazards such as overheating.

6.8 Any SuDS design must take account of groundwater levels and underlying geological conditions to ensure groundwater is protected from pollution.

6.9 Hydrological surveys and modelling would help to assess any potential hydrological changes to the tufa springs in Dunstan Park as a result of development at the Site. A qualified hydrologist should advise on the scope of this assessment.

6.10 A future planning application for development would need to be accompanied by a site-specific Flood Risk Assessment (FRA) and a foul and surface water management strategy.

7 Ecology and Biodiversity

Policy Drivers

7.1 Under the Environment Act 2021¹⁴ all new planning applications must deliver biodiversity net gain, with an initial requirement of 10% expected to be introduced for large sites in January 2024. The National Planning Policy Framework (2023)¹⁵ also includes policy on no net loss to biodiversity.

7.2 The following policies in the Adopted Local Plan 2036 are relevant to the Site:

- Policy G1: Protection of Green and Blue Infrastructure Network;
- Policy G2: Protection of biodiversity and geo-diversity;

¹⁴ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

¹⁵ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



Note continued

- Policy G7: Protection of existing Green Infrastructure features; and
- Policy G8: New and enhanced Green and Blue Infrastructure Network Features.

7.3 The following policies in Draft Local Plan 2040 are relevant to the Site:

- Policy G1: Protection of Green Infrastructure;
- Policy G2: Enhancement and Provision of New Green and Blue Feature;
- Policy G3: Provision of New Green and Blue Features – Urban Greening Factor;
- Policy G4: Delivering Mandatory Net Gains in Biodiversity; and
- Policy G5: Enhancing On-Site Biodiversity in Oxford.

Desk Based Review

7.4 There is one site of international importance and sites of national importance with 5km of the Site as set out in Table 7.1. Magdalen Quarry LNR is located 1.1km to the south-east. There no local wildlife sites within or adjacent to the Site. The closest Oxford City Wildlife Site is Bayswater Brook located 0.59km to the north.



Note continued

Table 7.1 Designated Sites within 5km of the Site

Site Name	Distance from Site	Interest
Sidlings Copse and College Pond SSSI	Approximately 1km NE	21.71 ha of interest for the habitats present including calcareous fen, broadleaved woodland, reed bed and acid and calcareous grassland. The site is of particular botanical interest, with >400 plant species supported. Within the calcareous grassland to the west, species typical of this habitat are supported including bee orchid (<i>Ophrys apifera</i>), large thyme (<i>Thymus pulegioides</i>), and woolly thistle (<i>Cirsium eriophorum</i>). Within the woodland, ground floral species are indicative of ancient woodland habitat (<i>Mercurialis perennis</i>), nettleleaved bellflower (<i>Campanula trachelium</i>), and herb Paris (<i>Paris quadrifolia</i>). Notably, the site is of ornithological and entomological interest; supporting reed bunting (<i>Emberiza schoeniclus</i>) and sedge warbler (<i>Acrocephalus schoenobaenus</i>) as well as 28 butterfly species and 149 moth species.
Lye Valley SSSI	Approximately 1.9km SE	2.34 ha of calcareous valley fen vegetation on permanently waterlogged peat, one of the best examples of this habitat in the southern England. Species supported in this habitat include rushes <i>Juncus</i> spp. and sedges <i>Carex</i> spp., and rare species such as grass-of-Parnassus (<i>Parnassia palustris</i>) and the insectivorous common butterwort (<i>Pinguicula vulgaris</i>). The site is also of ornithological interest, supporting reed warbler (<i>Acrocephalus scirpaceus</i>), reed bunting, water rail (<i>Rallus aquaticus</i>) and snipe (<i>Gallinago gallinago</i>).
New Marston Meadows SSSI	Approximately 2km W	44.7 ha of unimproved neutral meadows on the floodplain of the River Cherwell, supporting grassland and swamp of national importance.
Brasenose Wood and Shotover Hill SSSI	Approximately 2.4km SE	109 ha; traditionally managed woodland supporting a high range of plant species including 46 ancient woodland indicators. The hedges provide suitable habitat for invertebrates



Note continued

			including rare species like the black hairstreak butterfly (<i>Satyrion pruni</i>). The adjacent grassland contains a small area of heather-dominated vegetation.
Woodeaten SSSI	Wood	Approximately 2.9km N	14.03 ha of interest for the woodland present. The woodland supports plant species uncommon in the county, including water avens (<i>Geum rivale</i>), meadow saffron (<i>Colchicum autumnale</i>), and herb Paris as well as other botanical species of interest such as goldilocks buttercup (<i>Ranunculus auricomus</i> agg.), and sanicle (<i>Sanicula europaea</i>).
Iffley Meadows SSSI		Approximately 3.9km SW	36.14 ha; a mosaic of habitats including clay soils, waterways, grazing marsh and wet permanent pasture supporting a wide range of species including ancient woodland indicators and birds
Oxford (SAC)	Meadows	Approximately 4km W	261.31 ha of interest; Selected for supporting Annex I habitats Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>). The vegetation communities present are of high value and relatively rare due to the influences of prolonged grazing and hay-cutting on lowland hay meadows. The site also supports the Annex II species creeping marshwort (<i>Apium repens</i>). No other Annex I habitats or Annex II species are present as a qualifying feature for the designation of this site.
Port Meadow with Wolvercote Common and Green SSSI		Approximately 4.1km W	167.14 ha; neutral grassland grazed continuously for over a millennium and supporting species-rich lowland hay meadow. The site supports large numbers of wintering birds during winter floods, including wigeon (<i>Mareca penelope</i>) and snipe.
Hook Meadow and The Trap SSSI	Grounds	Approximately 4.3km W	11.85 ha; unimproved neutral meadows with wet alluvial calcareous clay soils bordering the River Thames.
Stanton Great Woods SSS		Approximately 4.5km E	58.21 ha of interest for the traditionally managed coppice woodland present, supporting



Note continued

		predominantly pedunculate oak (<i>Quercus robur</i>), ash (<i>Fraxinus excelsior</i>), hazel (<i>Corylus avellana</i>), and field maple (<i>Acer campestre</i>). Ancient woodland indicator species are supported including yellow archangel (<i>Lamium galeobdolon</i>), ransoms (<i>Allium ursinum</i>), and sweet woodruff (<i>Galium odoratum</i>).
Holly Wood SSSI	Approximately 4.6km E	25.55 ha of interest; the site supports coppiced woodland and is characteristic of an ancient broad-leaved woodland mercury and ransoms. Butterfly species of interest have been recorded including black hairstreak (<i>Satyrrium pruni</i>).
Holton Wood SSSI	Approximately 4.8km E	50.59 ha of interest, comprising a fragment of the ancient Bernwood Forest. Rarely, the site supports a diverse age range of pedunculate oak as well as coppiced stands of hazel, ash, and field maple.

- 7.5** Any future development at the Site would not directly impact any of the designated sites listed in Table 7.1. However depending on the number of additional vehicle trips generated by future development at the Site there is potential for indirect air quality impacts on these receptors.
- 7.6** A Phase 1 Botanical Survey was undertaken at Ruskin Fields (i.e. the Site) for OCC in October 2017¹⁶. The following target notes were recorded at the Site and nearby Dunstan Park (see Figure 7.1 and Table 7.2 and Table 7.3).

16

https://www.oxford.gov.uk/download/downloads/id/5153/phase_1_botanical_survey_target_notes_for_additional_oxford_city_sites.pdf



Note continued

Figure 7.1: Dunstan Park and Ruskin Fields Location of Target Notes

Dunstan Park and Ruskin fields



Map produced by Thames Valley Environmental Records Centre in 2017 © Crown Copyright. All rights reserved Oxfordshire County Council Licence No 100023343 (2017) FOR REFERENCE PURPOSES ONLY, NO FURTHER COPIES MAY BE MADE.

Table 7.2: Target Notes Recorded at Dunstan Park

Target Note 1. Parkland with improved amenity grassland (short mown) with planted broadleaved trees. The grassland includes perennial rye grass, cock's-foot, Yorkshire fog, rough meadow grass, creeping bent and red fescue with broadleaved herbs including creeping buttercup, white clover, red clover, broadleaved dock, curled dock, ribwort plantain, common mouse-ear and dandelion. Trees include Norway maple, horse chestnut, silver birch, wild cherry and sycamore.





Note continued

Target Note 2. Broadleaved semi-natural woodland (with some planted trees). It includes ash, field maple, aspen, horse chestnut, holly and sweet chestnut. Planted trees include wild cherry, Norway maple, common lime and small-leaved lime. The shrub layer includes snowberry, planted dogwood, elder and small amounts of spindle. Wetter areas include crack willow and grey willow. The field layer has bramble, nettle, wood avens, cleavers, ground ivy, wood sedge and where heavily shaded there are areas of bare ground. Wetter areas include great horsetail, hairy sedge and pendulous sedge.



Target Note 3. Tufa depositing stream. The stream had been recently cleared at the time of the survey and much of the vegetation had been trampled. It includes areas of flag iris with brooklime, bittersweet, great horsetail, giant fescue, fool's water-cress, floating sweet-grass, marsh marigold and great willowherb. There is a large amount of small diameter deadwood in the stream. Surrounding trees include ash and crack willow with hazel, elder, hawthorn and horse chestnut.

This area has value for invertebrates including the previously record of NERC S41 fly - Southern yellow splinter crane fly (*Lipsothrix nervosa*).



Small pool in stream bed



Tufa deposits



Note continued

Table 7.3: Target Notes Recorded at Ruskin Fields

Target Note 1. Tall herb and an area of short mown amenity grassland. The tall herb is locally dominated by nettle and great willowherb with teasel, creeping thistle, cock's-foot, forget-me-not species, common ragwort, bladder campion, ground ivy, hairy sedge, silverweed, false oat-grass and red fescue.



Amenity grassland



Tall herb



Note continued

Target Note 2. Semi-improved neutral grassland with some patches of nettle and, at the bottom of the slope, hard rush. Grasses comprise mainly robust species with cock's-foot, meadow fescue and false oat-grass but also include red fescue and creeping bent. More abundant broadleaved herbs include common nettle, creeping thistle, broadleaved dock, hogweed, creeping buttercup and cleavers. More locally there is black knapweed, hairy sedge, meadow vetchling, yarrow, dove's-foot crane's-bill, common sorrel, red clover and white clover. The sward is generally dense and closed with a thatch of dead plant material in some places.



Semi-improved neutral grassland

Target Note 3. Semi-improved neutral grassland. It is bounded by hedges including hawthorn, holly, ash, sycamore and bramble. Cock's-foot and red fescue are locally dominant with other grasses including Yorkshire fog, false oat-grass, creeping bent and small-leaved Timothy. There appears to be some moderate interest here with locally frequent black knapweed and other species including meadow vetchling, yarrow, common sorrel, creeping cinquefoil, red clover, common vetch, selfheal, square-stalked St. John's-wort, hedge bedstraw, creeping buttercup and meadow buttercup. Other broadleaved herbs include tall herbs such as creeping thistle and curled dock. Additional survey is recommended at a more appropriate time of year.



Semi-improved neutral grassland



Note continued

Target Note 4. Semi-improved neutral grassland. This small field is bounded by thick hedges with areas of outgrowth dominated by blackthorn and bramble. The hedges also include hawthorn, apple and sycamore. Grasses include abundant cock's-foot with red fescue, false oat-grass and creeping bent. Broadleaved herbs include frequent black knapweed, creeping buttercup, red clover, with lesser stitchwort, square-stalked St. John's-wort, hogweed, broadleaved dock, common mouse-ear, ribwort plantain, meadow vetchling, creeping cinquefoil and curled dock. There is small amount of common bird's-foot-trefoil. Centrally, there is a patch with abundant hard rush. It includes some meadow fescue and cuckooflower.



Semi-improved neutral grassland

Target Note 5. Pond. It is a small area of depressed ground dominated by great willowherb with smaller amounts of reed canary-grass, pendulous sedge, hard rush and brooklime. A drainage pipe flows into the pond.





Note continued

Target Note 6. Orchard. Includes several mature domestic apple trees. The grassland is short mown and appears semi-improved. This area may have value for invertebrates and fungi and as S41 habitat.



Target Note 7. Strip of broadleaved secondary woodland. It is dominated by young to semi-mature cherry. The field layer has bramble with ivy and ground ivy with small amounts of male-fern and hedge woundwort.



- 7.7** In summary the Site consists of a series of neutral grassland fields. They appear semi-improved ranging from species-poor to moderately species-rich (semi-improved – good) with species including locally frequent black knapweed and meadow vetchling. Some of the boundary hedges are wide and dense and likely to have value of birds. To the south, the Site also includes a small orchard, ponds and area of tall herb. The evidence does not reveal any significant constraints to future development at the Site however this would need to be designed to avoid impacts and protect the ecological features as far as possible.
- 7.8** A Phase 1 Habitat Survey¹⁷ undertaken for the application at ‘Ruskin Hall Dunstan Road Oxford Oxfordshire OX3 9BZ’ (ref. 22/00962/FUL) (immediately south of the Site) identified suitable habitat for roosting bats, nesting birds, great crested newts, reptiles and badgers.

¹⁷

https://public.oxford.gov.uk/online-applications/files/7437EA13B3929996AA621F7E147FE5A8/pdf/22_00962_FUL-PRELIMINARY_ECOLOGICAL_APPRAISAL-2753937.pdf



Note continued

Subsequent eDNA analysis returned negative results for great crested newt DNA at the pond within Ruskin Fields¹⁸. Preliminary Roost Assessment, Bat Emergence Surveys and a tree climbing inspection concluded the site to be of negligible value in relation to roosting bats but has some intrinsic value as foraging and commuting habitat.

Further Actions and Opportunites

- 7.9 Policies G1 and G3 of the draft Local Plan 2040 require protection of existing green infrastructure features and enhancement of greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features.
- 7.10 Preliminary analysis undertaken for the draft Local Plan 2040 suggests that the presence of various green infrastructure features on the Site at present means it is likely to score above the minimum thresholds for green surface cover. As such, proposals will need to ensure that this score is retained (no net loss), to be demonstrated through submission of the Urban Greening Factor (UGF) assessment as required by Policy G3. New development on the Site will need to consider how existing green features, particularly higher scoring elements, can be retained including the mature trees, the pond and the hedgerow along Stoke Place. Where green elements are proposed to be removed, sufficient high-quality replacements will need to be incorporated into the new design, and/or existing green infrastructure that is being retained will need to be enhanced, to preserve the baseline UGF score as a minimum. The Site is likely to be able to accommodate additional native hedgerow planting to create nature corridors, diverse planting in landscaping and gardens, new areas of tree planting and enhancements of existing features that are to be retained. This type of planting will also aid in achieving biodiversity net gain. The policy sets out requirements for green infrastructure on the Site.
- 7.11 Hedgerows within the Site are potentially "important" under the Hedgerow Regulations. An arboricultuiral survey would assess the quality of trees on-site. Any high quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity and to enhance the character and appearance of the Old Headington Conservation Area.
- 7.12 The evidence does not reveal any significant constraints to future development at the Site however this should not be relied upon as it has been undertaken by third parties and is now out of date. It is recommended that an updated Phase 1 Habitat Survey is undertaken at the Site by a qualified ecologist to record the habitats at the Site and outline the potential species that may be present and the scope of further surveys. Future development would need to be designed to avoid impacts and protect the ecological features as far as possible.

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https://public.oxford.gov.uk/online-applications/files/9AB3FF627E73FD3F289310AE129354B8/pdf/22_00962_FUL-UPDATE_BAT_SURVEY-2807313.pdf



Note continued

7.13 Opportunities should also be explored at an early stage for enhancements to green infrastructure and achieving a 10% BNG on-site.

8 Traffic and Transport

Policy Drivers

8.1 The following policies in the Adopted Local Plan 2036 are relevant to the Site:

- Policy M1: Prioritising walking, cycling, and public transport;
- Policy M2: Assessing and managing development;
- Policy M3: Motor vehicle parking;
- Policy M4: Provision of electric charging points; and
- Policy M5: Bicycle Parking.

8.2 The following policies in Draft Local Plan 2040 are relevant to the Site:

- Policy G2: Enhancement and Provision of New Green and Blue Feature;
- Policy C6: Transport Assessments, Travel Plans and Service Delivery Plans;
- Policy C7: Bicycle and Powered Two Wheelers Parking Design Standards;
- Policy C8: Motor Vehicle Parking Design Standards; and
- Policy C9: Electrical Vehicle Charging.

Desk Based Review

8.3 iTransport produced a technical note for UWL in November 2022 which described the following transport infrastructure at the Site and surroundings:

- The Site is bound on three sides by the local highway network. The A40 is to the north, Dunstan Road is to the south (via the main college campus), and Foxwell Drive is to the west.
- A Public Right of Way (PRoW) byway (320/55/10) and bridleway (320/56/10) currently run along the eastern site frontage via Stoke Place. The byway goes from the priority junction of Dunstan Road / Stoke Place / St Andrew's Road for circa 210m before transitioning into the bridleway which continues for a further 140m to the A40.
- The nearest bus stops are on Halliday Hill approximately 400m (or some 5-minute walk) from the Site's northern access onto Foxwell Drive, or Saffron Way (circa 600m). The former is served by bus route 13 (and the X3 City in evening) and later is served by the X3 City); these link Barton and the Site to Abingdon, via Oxford City centre. Both provide three services an hour Monday-Friday, three buses per hour on Saturdays and two per hour on Sundays. The X3 City directly passes the Site on Foxwell Drive.
- Oxford railway station is located approximately 5km south west of the Site. The station is served by the GWR, Chiltern Railways and CrossCountry, with trains to key locations such as London Paddington, London Marylebone, Reading, Manchester Piccadilly and



Note continued

Bournemouth. There are up to 4 trains per hour to London and is linked via all of the Site's buses.

Further Actions and Opportunities

- 8.4 The i-Transport note demonstrates that allocation of the Site can meet the transport policy tests set out at paragraph 110 of the NPPF and in particular that:
- Appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location, within a ten minute walk of a regular bus service to Oxford City centre, and within a reasonable walking and cycling distance to a range of everyday education, retail, health, and leisure facilities. Opportunities exist for further enhancement to bus, walking, and cycle connections;
 - Safe and suitable access to the Site can be achieved for all users;
 - The design of any proposals could meet the current national and local guidance; and
 - The scale of the development is unlikely to have a material impact on the local highway network, with Foxwell Drive being a lightly trafficked, wide road, with good pedestrian facilities.
- 8.5 According to Policy SPE19: Ruskin Field there are opportunities to improve pedestrian and cycle access to the Site via the BOAT/ bridleway along Stoke Place which could include contributions towards improvements to the existing surfacing of both the BOAT and bridleway.
- 8.6 No further immediate actions are recommended at this stage.

9 Cultural Heritage

Policy Drivers

- 9.1 The following policies in the Adopted Local Plan 2036 are relevant to the Site:
- Policy DH3: Designated heritage assets;
 - Policy DH4: Archaeological remains; and
 - Policy DH5: Local Heritage Assets.
- 9.2 The following policies in Draft Local Plan 2040 are relevant to the Site:
- Policy HD1: Conservation Areas;
 - Policy HD2: Listed Buildings;
 - Policy HD5: Archaeology;
 - Policy HD6: Non-Designated Assets; and
 - Policy HD7: Principles of High-Quality Design.

Desk Based Review

Built Heritage

- 9.3 Donald Insall Associates undertook an initial assessment of heritage impacts in November 2022. The following description of heritage sensitivities is provided:



Note continued

Whilst there are a number of listed buildings within 1km, there are only two which are in the vicinity of the site and these are: Ruskin College/ The Rookery (a Grade II listed former house) and the walled garden which is part of this and which has a distinctive crinkle-crinkle northern wall (also listed Grade II). There is a protected view from Elsfield to the north, looking south towards the ‘dreaming spires’.

The site of Ruskin College, including the two listed buildings identified above, and the paddock immediately to the north are already allocated in the current local plan for development under policies SP55 and SP66. However, in 2020, the Planning Inspector’s Report into the Local Plan found that whilst development on the southern part of the site (the area within Policy SP55) would not have an adverse effect on the significance of the Conservation Area or heritage assets development on the northern part of Ruskin Field “could have an adverse impact on the Old Headington Conservation Area and the Elsfield View Cone” and as a result it was not allocated. We have been asked to consider whether any material change in circumstances since that decision was made might indicated that this site could now be allocated and developed without causing harm to heritage assets.

- 9.4 In relation to the setting of the listed buildings, the report concludes that development can be accommodated on the Site without adverse impacts on the listed building and listed wall at Ruskin Campus because it is insulated from those structures by the new library and teaching accommodation at the Campus and will be further separated by development of site SP56, which is already allocated for housing or further college related development in the current Local Plan 2036.
- 9.5 The report recognises that some harm would be caused to the character of the Conservation Area through development at Ruskin Fields but any harm would be less than substantial.

Archaeology

- 9.6 An archaeological desk-based assessment¹⁹ was undertaken for land at ‘Ruskin Hall Dunstan Road Oxford Oxfordshire OX3 9BZ’ (ref. 22/00962/FUL) to the south of the Site. Key findings of the assessment are summarised below:
- Evidence for prehistoric activity in the surrounding area is fairly limited although archaeological excavations at the nearby former football stadium, Manor Ground, did yield a struck flint assemblage from which the earliest material dates to the Mesolithic or early Neolithic period (JMHS 2003). The bulk of the flint assemblage comprised artefacts from the later Neolithic and Bronze Age accompanied by pottery of a similar date. Also at this site the quantity of middle-late Iron Age pottery present suggests that a contemporary settlement may be located within the immediate vicinity.*

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https://public.oxford.gov.uk/online-applications/files/398319CBDEDE23A9A50ED853B03C756B/pdf/22_00962_FUL-ARCHAEOLOGICAL_EVALUATION_REPORT-2753303.pdf



Note continued

- *There is extensive evidence for Romano-British activity within the Headington area and it is clear that a major pottery industry was flourishing in the wider area during this period. Numerous kilns sites have been found in the vicinity of the north-south Roman Road which ran just to the east of Headington between Alchester and Dorchester.*
- *In 1935 during house building on Cemetery Lane (now Dunstan Road) many potsherds, mostly mortaria of pinkish-white and buff clay and other kitchen vessels of coarse ware of the late 3rd and 4th centuries, were found (VCH 1939, 338). The suggested location of these finds is along the southern side of Dunstan Road opposite Ruskin College although the exact location was not recorded.*
- *Documentary evidence in the form of a charter of 1004 records King Ethelred confirming the details of a land endowment here at a royal manor. The manor is documented again within the Domesday records of 1086 when it was held by the King and it remained in the hands of the crown until after the death of Henry I (1135), after which the importance of Headington diminished in favour of Woodstock. The possible association of the area around Ethelred Court, just to the south of Ruskin College, with the location of a Royal Manor has been suggested since the 19th century although this remains unconfirmed despite previous archaeological investigations prior to new developments in 1988 and 1992 (OAU 1993).*
- *Later medieval remains have been encountered at various locations in Old Headington and the medieval church of St Andrews attests to the continued existence of a settlement here throughout the period.*

9.7 Oxford Archaeology also undertook a geophysical archaeological field evaluation of land at 'Ruskin Hall Dunstan Road Oxford Oxfordshire OX3 9BZ' in 2008²⁰. The location of trial trenches in relation to the Site (located immediately to the north) are shown in Figure 9.1

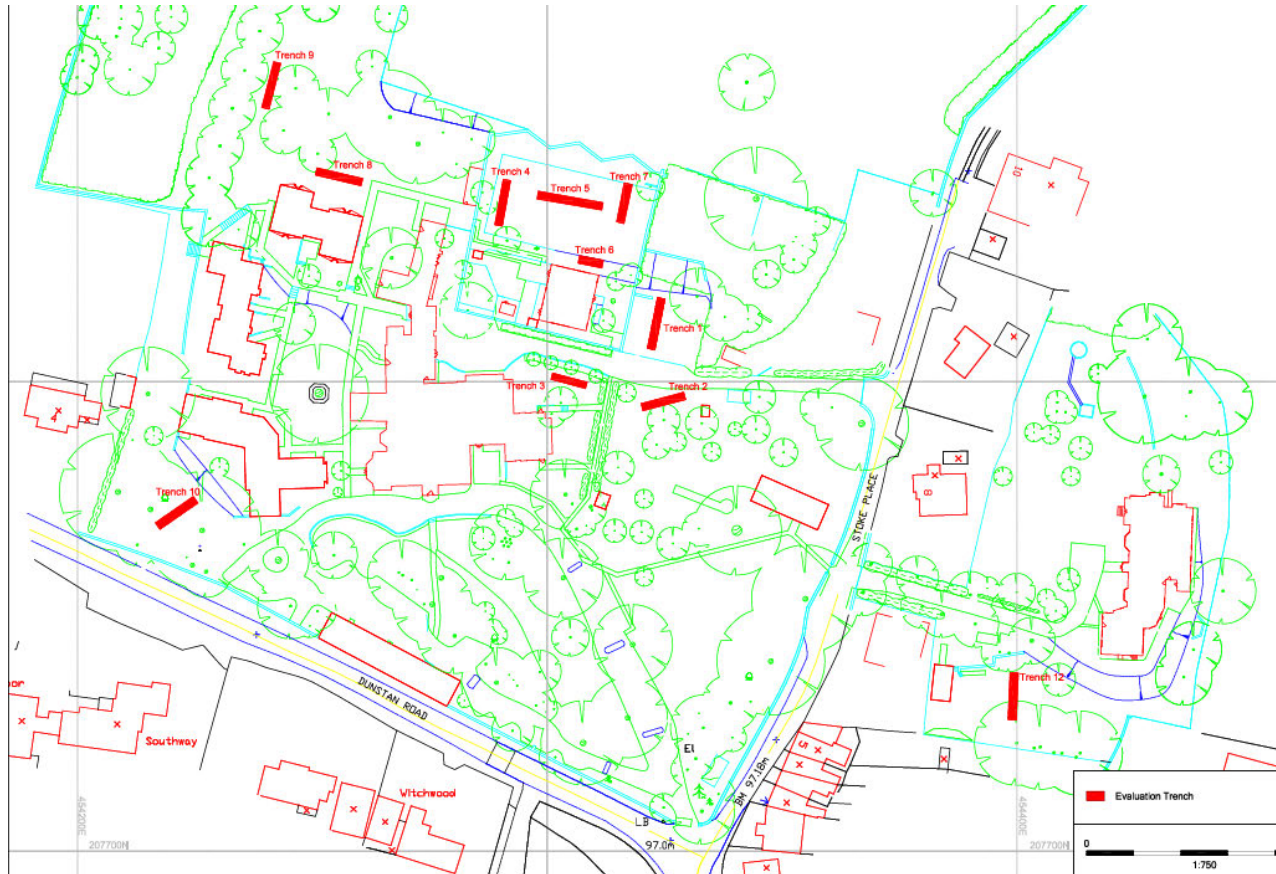
20

https://public.oxford.gov.uk/online-applications/files/398319CBDEDE23A9A50ED853B03C756B/pdf/22_00962_FUL-ARCHAEOLOGICAL_EVALUATION_REPORT-2753303.pdf



Note continued

Figure 9.1 Location of Evaluation Trenches



- 9.8 The earliest features encountered were the pits within Trench 8 that produced fragments from an early Iron Age carinated vessel. These indicate a presence within the landscape although it is not clear if these represent a ‘one off’ deposit or form part of an associated settlement.
- 9.9 With regard to the Roman remains, the evaluation found that the western portion of the Site has high potential for well-preserved remains to survive across a larger area. Both the current evaluation and previous construction works have encountered significant remains across this part of the Site with the associated pottery strongly suggesting that mortarium production was situated close by.
- 9.10 The following planning condition was attached to the permission for 22/00962/FUL:
- No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological recording in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. All works shall be carried out and completed in accordance with the approved written scheme of investigation, unless otherwise agreed in writing by the Local Planning Authority.*



Note continued

Reason: Because the development may have a damaging effect on known or suspected elements of the historic environment of the people of Oxford and their visitors, including prehistoric and Roman remains in accordance with Policy DH4 of the Oxford Local Plan 2036.

- 9.11 Based on the above it would be reasonable to assume the presence of archaeology at the Site.

Further Actions and Opportunities

- 9.12 Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Development must be sensitively designed to preserve and enhance the setting of the listed buildings and character and appearance of the conservation area (in accordance with HD1 and HD2).
- 9.13 New development must take into consideration the potential presence of archaeological remains to demonstrate compliance with Policy HD5.
- 9.14 It is recommended that a desk-based archaeological assessment is undertaken by a qualified archaeologist to determine the potential for archaeological remains at the Site and outline further survey work that may be required.

10 Landscape and Visual

Policy Drivers

- 10.1 The following policies in Draft Local Plan 2040 are relevant to the Site:
- Policy HD7: Principles of High-Quality Design; and
 - Policy HD9: Views and Building Heights;

Desk Based Review

- 10.2 An LVIA undertaken for 'Land West Of Barton North Of A40 And South Of Bayswater Brook Northern By-Pass Road' (ref. 13/01383/OUT) which shows the Site within the '3B Historic village cores – Old Headington Core':

Remaining fields in the north, generally well maintained private gardens and mature trees give the area a leafy character. This feeling of space is enhanced by Bury Knowle Park to the south, Dunston Park in the northwest, and views northwards, downhill to the countryside beyond. The A40 ring road forms the north boundary to this character area. It is largely screened and vehicle noise is dampened by trees along its length and along field boundaries downslope from the village core.

and '5A Settled Plateau – Headington' Oxford city landscape areas²¹ (see Figure 10.1):

Prominent platform of sand and calcareous sandstone to the east of the Cherwell Valley with a steep scarp slope, probably most famous at Headington Hill. The wooded character of this

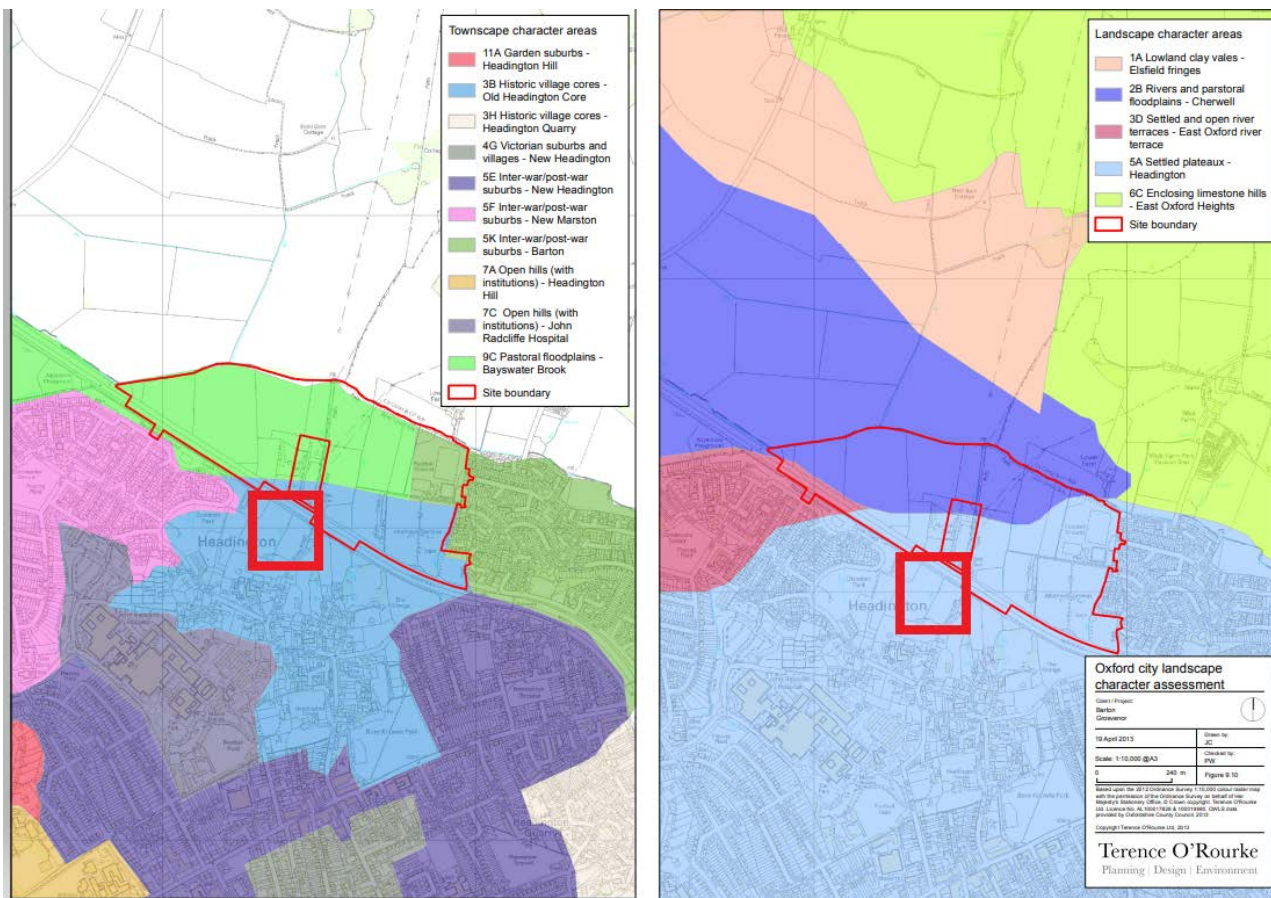
²¹ https://www.oxford.gov.uk/downloads/file/4712/landscape_character_assessment_part_1



Note continued

plateau forms a wooded backdrop to the historic core of Oxford, the sandy soil supporting Scots Pine as landmark features. The southern edge of the plateau is incised by narrow valleys, including the Lye Valley local nature reserve.

Figure 10.1 Oxford City Landscape Character Assessment (taken from 13/01383/OUT, site location shown in red box)



10.3 In relation to the visibility of the land from the Elsfield View Cone, the Donald Insall Associates report concludes that: the Site does not lie within the cone, which is focused on the City centre, and that the Site can be developed without causing harm to the designated heritage assets which comprise the historic skyline of Oxford.

Further Actions and Opportunities

- 10.4 The potential impact on views from the north should inform the choice of siting, height, form and appearance of new buildings, as will the listed buildings, wall, hedges and pond.
- 10.5 Opportunities should be explored at an early stage for enhancements to green infrastructure at the Site.



Note continued

11 Air Quality

Policy Drivers

- 11.1 Policy R4: Air Quality Assessments and Standards states that planning permission will only be granted where the impact of new development on air quality is mitigated and where exposure to poor air quality is minimised or reduced as far as is reasonably practicable. The design of new development (during construction and in operation) needs to consider the potential impacts upon air quality for current and new occupants. Sensitive uses such as schools, nurseries, care homes and healthcare settings, should be located away from areas of poor air quality as far as reasonably practical through careful site layout designed to protect human exposure to high pollution levels.

Desk Based Review

- 11.2 In September 2010 the City Council made an Air Quality Management Order declaring the whole of the city as an AQMA, to include the 7 localised hotspots where pollution levels of nitrogen dioxide have exceeded national objectives. According to the draft Local Plan 2040 the Site is in an air quality hot spot area.
- 11.3 This is not a constraint to development but the impacts of future development on air quality would need to be considered as part of a planning application.

Further Actions and Opportunities

- 11.4 Adjustments and considerations at design stage may be helpful in reducing the ongoing impact of poor air quality. Potential options may include considering layout options that place habitable spaces and openings away from pollution sources such as busy roads, landscape buffers, and designing in walking and cycling options as integral part of schemes.
- 11.5 No immediate further actions are recommended at this stage.

12 Climate Change

Policy Drivers

- 12.1 The following policies in Draft Local Plan 2040 are relevant to the Site:
- Policy R1: Net Zero buildings in operation; and
 - Policy R2: Embodied carbon in the construction process.

Desk Based Review

- 12.2 Peat deposits are especially beneficial as carbon sinks and any loss should be avoided. The Site is in close proximity to recorded peat reserves at Dunstan Park however there no records within the Site itself.

Further Actions and Opportunities

- 12.3 A Phase I investigation would confirm presence of peat deposits on-site and recommend further ground-based investigations as part of a Phase II survey.



Note continued

13 Summary

- 13.1 In response to comments received in the Consultation Report Part 1 this desk-based appraisal has checked but not identified any evidence of Tufa springs and associated habitats and species or peat reserves within the Site. Other issues raised in consultation have also been checked but none represent a constraint to development.
- 13.2 This report does not identify any other significant issues that would be a risk to development at the Site. At the detailed design stage of any development, care will need to be taken to: respect and investigate any archaeological interest, to achieve a policy compliant biodiversity net gain and to design buildings with respect to their neighbours and views to and from the Site.
- 13.3 All of these are matters which can be addressed in the normal way through the preparation of a planning application.