

- 11/02881/FUL
- CASTLE MILL, ROGER DUDMAN WAY

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Please Reply to: Swindon
Our Ref: TAG/C22175
Your Ref:
Date: 6 February 2012

Mr M Hancock
Chief Principal Planner
Oxford City Council
Ramsay House
10 St Ebb's Street
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Dear Mr Hancock

Planning application for post-graduate student accommodation at Castle Mill, Roger Dudman Way, Oxford, for the University of Oxford – Proposed Policy HP6 Affordable Housing from Student Accommodation

I am writing in relation to the above planning application for post-graduate student accommodation at Castle Mill, and in particular to a key issue which has emerged as a result of the recent decision of the City Council to adopt and enforce Policy HP6, which seeks to secure contributions towards the provision of affordable housing when certain types of new student accommodation is proposed.

This letter will deal with the application of the proposed policy to the proposed Castle Mill development. It does not make any general points about the wider implications of the proposed policy.

1. Committed Site

The Castle Mill site has been identified as suitable for student accommodation for some time. Indeed, the current site has not been regarded as suitable for forms of housing other than for students. This appears to be because of its location, adjacent land uses, and the shape of the site. The site was identified for this specific purpose in an early version of the Oxford City Local Plan and again in the Oxford Local Plan 20012-2016 (Policy DS22) which states:

"Planning permission will not be granted at land at North End Yard, Cripsey Road for uses other than purpose-built student accommodation for use by the University of Oxford"

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Mr M Hancock
Chief Principal Planner

The explanatory text notes that:

"The access is very restricted but the site is considered to be suitable for purpose-built student accommodation".

And

"...it is considered that any other form of residential development would undermine the need to strike a balance between different land uses and needs".

Most recently the sites and housing DPD submission document has identified the site as suitable for student accommodation and has noted:

"...no other uses likely to come forward for the site due to the narrowness of the site and being owned by the University of Oxford".

The option of allocating the site for "car-free residential" development was rejected because the site "may be difficult to design family housing so as to avoid habitable rooms facing the noise of the railway".

Following on from the original allocation, planning permission was granted for the development of the site for post-graduate student accommodation for 517 bedspaces. The planning permission has now been implemented in part, and the current application seeks permission for a modified form of development on the balance of the site. There is therefore, an extant permission on the site and it is a committed site both from the Development Plan allocation and the planning permission.

In relation to Policy HP6 therefore, the extant permission could continue to be implemented without reference to the Policy. The fact that the site is committed for purpose-built student accommodation means that it would be unreasonable to assume that an alternative residential use for family housing was feasible. There is a long standing commitment to student housing on this site. The City Council has, for some time, sought uses for the land which would not lead to the generation of traffic movements. The site is very clearly not suitable for family housing.

2. Nature of the development

The proposed development is not speculative. It is being made by Oxford University in order to meet the needs of post-graduate students who are studying at the University. The new policy is clearly designed to secure contributions from developers of sites which, could otherwise be developed for general family housing. There is still a large number of students at Oxford who need to be housed in purpose-built accommodation. This will ensure that no students are then living in housing which is suitable for family housing in the wider community.

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The University is very anxious to provide good quality accommodation at affordable prices for students. Rental levels are below market rents so the proposed development is effectively affordable housing in its own right. At the present time Policy CS25 imposes a restriction on University development where more than 3000 students live in the community, in non-purpose-built accommodation. The University is very aware of this threshold and is anxious to provide as much purpose-built student accommodation as possible. It is extremely unlikely to ever give up this site for another use and so it would not be available for family housing in any foreseeable circumstance.

3. The distinction between development carried out by Oxford University and that undertaken by the Colleges

The colleges are able to "obtain relief" from the policy because for the most part, their development is contained within single sites. Moreover, student accommodation provided by colleges very often includes some forms of "teaching" space which also secures exceptions to the Policy. In contrast, the University almost invariably provides teaching, research and support facilities on sites which are unrelated to the residential accommodation which it provides.

It would be extremely unusual for the University to provide any residential accommodation alongside or as part of any of the other facilities it provides, such as laboratories, libraries, sports facilities, administrative offices etc.

Oxford University is not a campus style university, and the criteria for exceptions to the policy fail to acknowledge its special position.

4. Is the site an existing academic campus?

Although there is no formal teaching on the site, or in the proposed buildings, there are communal facilities and study rooms, so the site is arguably a campus type site.

In the light of recent meetings and discussions, specifically to consider the impact of Policy HP6, the University has concluded, albeit that it regards the Castle Mill site as a special case in any event, that the general application of the policy is something that will be tested before an Inspector at a forthcoming Inquiry. The University is therefore intending to make provision for a financial contribution towards affordable housing in Oxford arising out of the additional units of student accommodation generated by the current application, to be made when and if the policy is formally adopted following the Inquiry.

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There have also been recent discussions concerning the visual impact of the proposed development from Port Meadow, particularly in relation to the "view cone" from Wolvercote car park.

We have now completed some careful analysis of the views from the Wolvercote car park (copies of drawings have been supplied), and have concluded that the visual impact of the proposed scheme will be negligible or non-existent. We are aware however, that when viewed from the towpath and from positions much closer to the site, the existing approved scheme does present a hard edge as a linear form, and does partly shield some parts of buildings to the east. The current proposal will, in places, be higher than the existing approved scheme, and its effect would therefore be marginally greater. We have given careful consideration as to how best to mitigate this and have concluded that the following measures would be beneficial:

- Carry out off-site tree planting along the edge of Port Meadow with the consent and approval of the owners etc.
- Consider the introduction of different colours and materials for certain elements of the scheme.
- Reduce the ridge height of the scheme by altering the roof pitch and introducing a "slot feature" along the ridge line which would reduce the overall height by about 1.2m

The University is therefore prepared to make the changes described above and to carry out tree planting with the owners' permission as part of this proposal.

Yours sincerely,



Terry Gashe
Consultant
Development Planning and Design Services Ltd
tgashe@dpds.co.uk

Recommendations for protection and enhancement of site's ecology

Recommendation	Details
Recommendation 1	A new artificial badger sett has been created to the north of the site. A 2m wide badger run will be retained along the western boundary to allow badger movement through the site.
Recommendation 2	Maintain development site as close-mown grassland to make the land unsuitable for reptiles to prevent harm.
Recommendation 3	The area surrounding the badger sett will be allowed to develop rough grassland to provide suitable reptile habitat.
Recommendation 4	A hedgerow of thorny shrubs including hawthorn, blackthorn <i>Prunus spinosa</i> and dog rose <i>Rosa canina</i> will be planted around the badger sett area.
Recommendation 5	Two reptile hibernation/refuge sites will be created within this area, using logs from felled trees.
Recommendation 6	Lighting will be directed away from the badger run and badger sett area.
Recommendation 7	Planted trees and shrubs in the rest of the site will include a minimum of 50% native species that are representative of the geographical location and will be sourced from stock of local provenance (see Appendix B for a list of suitable species).
Recommendation 8	To enhance the site for nesting birds six Schwegler No. 17 Triple Cavity Swift boxes will be recessed into the top of northern exterior walls below the eaves of blocks 6, 7 and 8.
Recommendation 9	Nesting birds and their nests are protected under the Wildlife and Countryside Act 1981 (as amended). Disturbance to nesting birds can usually be avoided by carrying out works and by excluding birds from suitable nest sites outside the bird nesting season (the nesting season is generally March to August inclusive). However, birds may nest outside the peak nesting period, in which case, works that would result in nest disturbance must cease until birds have finished nesting.
Recommendation 10	Lawns will be created using nutrient poor soils and sown with Emmorsgate EL1 – Flowering lawn mixture. No perennial ryegrass <i>Lolium perenne</i> will be sown.
Recommendation 11	The adoption of horticultural good practice (e.g. no or low use of residual pesticides).
Recommendation 12	The proper integration, design and maintenance of Sustainable Urban Drainage (SUDS).